

Final Environmental Assessment for the San Diego Gas & Electric Company Habitat Conservation Plan Amendment

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Acronyms and Abbreviations

APLIC	Avian Power Line Interaction Committee
BGEPA	Bald and Golden Eagle Act
C.F.R.	Code of Federal Regulations
Cal-IPC	California Invasive Plant Council
CDFW	California Department of Fish & Wildlife
CESA	California Endangered Species Act
Corps	U.S. Army Corps of Engineers
CPUC	California Public Utilities Commission
EA	Environmental Assessment
EAA	Eagle Awareness Area
ECP	Eagle Conservation Plan
EMU	eagle management unit
EO	Executive Order
ESA	Endangered Species Act
GIS	geographic information system
HCP	Habitat Conservation Plan
IOU	investor-owned utility
ITP	incidental take permit
LEHCP	Low-Effect Habitat Conservation Plan
MBTA	Migratory Bird Treaty Act
NEPA	National Environmental Policy Act
NERC	North American Electric Reliability Corporation
O&M	operations and maintenance
PEIS	Programmatic Environmental Impact Statement
PIZ	Probable Impact Zone
PSR	Pre-activity Survey Report
R/E Program	restoration and enhancement program
SDG&E	San Diego Gas & Electric Company
Service	U.S. Fish and Wildlife Service
U.S.C.	United States Code

Glossary of Defined Terms

Term	Definition
Annual Report	Report required under Section 6.4 of the HCP Amendment that will be prepared each year by SDG&E and provided to the Service to document permit compliance and implementation of the conservation strategy.
Biologist	A person who has the educational background, training, and work experience (handling experience or permits) required to perform a specific biological task. The term also includes a botanist, where applicable, for specific plant-related tasks, or habitat restoration specialists.
Covered Activities	Current and future activities of SDG&E, arising out of or in any way connected with the siting (including any site assessment, surveying, testing, or planning), design, installation, construction, use, maintenance, repair, and removal of Facilities within the Plan Area; biological surveys, handling, and habitat management; or any activities associated with the acquisition of property rights in relation thereto, as more fully described in Sections 2, 4, 5, and 6 of the HCP Amendment. Covered Activities include two broad categories: (1) operations and maintenance of existing Facilities (which includes SDG&E's Wildfire Fuels Management Program); and (2) New Construction. See definitions below for operations and maintenance, Wildfire Fuels Management, and New Construction.
Covered Species	All species, subspecies, and populations identified in Section 3, Table 3.1, of the HCP Amendment.
Facilities	Facilities that are part of SDG&E's operations as an investor-owned utility company, whether owned or operated by SDG&E, that are described in Section 2 of the HCP Amendment.
HCP Amendment	The SDG&E HCP Amendment to SDG&E's 1995 Subregional Natural Community Conservation Plan/Habitat Conservation Plan to the U.S. Fish and Wildlife Service (Service) and CDFW.
Implementing Agreement	The 1995 San Diego Gas & Electric Company Subregional Natural Community Conservation Plan Implementing Agreement/CESA Memorandum of Understanding, together with all documents and instruments that are attached hereto or incorporated herein by reference, and all addenda thereto.
incidental take	Take of species that is prohibited by ESA Section 9(a)(1)(B) where such take is incidental to, and not for the purpose of, the carrying out of an otherwise lawful activity.
land cover	The percent of a given land area covered in vegetation, generally equaling the area of the site covered by the shadow if the sun were directly overhead.
listed species	Species listed as endangered or threatened under the ESA.

Term	Definition
Major Amendment	Those changes to the HCP Amendment that cannot be made administratively and instead require formal amendment of the permit itself, as discussed in Section 6.5.1.3 of the HCP Amendment.
Mapped Areas	Those areas specifically delineated or designated as providing the necessary components for a species to persist and recover and with the potential for a species to occur (e.g., critical habitat, preserve areas). The Service will update Mapped Areas as new data and information that improve the quality and accuracy of Mapped Areas are acquired.
Minor Amendment	Those changes to the HCP Amendment that can be made administratively without formal amendment of the permit itself, as discussed in Section 6.5.1.2 of the HCP Amendment.
Mitigation Credits	A unit of trade used to offset habitat impacts that occur in the PIZ or Plan Area. Each Mitigation Credit typically represents 1 acre of habitat that has been preserved in perpetuity.
modeled habitat	For the HCP Amendment, modeled habitat was created using the best publicly available data and information to represent an area where a species is likely to be found based on the quality, suitability, and occupancy of a particular area.
New Construction	Construction of new electric transmission and distribution infrastructure including substations and switching stations, gas transmission and distribution pipelines, energy generation and storage Facilities, or other new electric, gas, energy generation or storage Facilities that may be planned, sited, or routed in the Plan Area, either within or outside the PIZ.
operations and maintenance (O&M)	Activities regarding the control and upkeep of existing Facilities, including but not limited to routine, preventive, scheduled and unscheduled actions aimed at preventing equipment failure or decline with the goal of maintaining or increasing efficiency, reliability, and safety.
Operational Protocols	Those policies and procedures detailed in Section 5.1 of the HCP Amendment that are designed to avoid, minimize, and mitigate impacts from Activities by providing an environmentally sensitive approach to SDG&E's day-to-day operations, including Covered Activities (i.e., traditional utility construction, maintenance, and repair).
Plan Area	The 2,815,930-acre (4,400-square-mile), service area within which SDG&E supplies power to a population of business and residential accounts and in which may conduct Covered Activities in accordance with the HCP Amendment. The Plan Area is synonymous with SDG&E's service area and is depicted on the map attached to the HCP Amendment as Figure 1.
Probable Impact Zone (PIZ)	The portion of the Plan Area around existing Facilities where impacts are reasonably likely to occur. More specifically, the PIZ widths and corridors are measured from the center of infrastructure and represent the maximum area within which Covered Activities at these Facilities would occur. The PIZ captures all components associated with linear infrastructure, such as poles and towers, guy wires, and gates.

Term	Definition
Pre-activity Survey	The field survey described in Section 5.1.3 of the HCP Amendment that is completed prior to the start of Covered Activities as outlined in Section 6.3.2 occurring within or adjacent to habitat with potential to support Covered Species.
Pre-activity Survey Report or PSR	The report that memorializes the findings of a Pre-activity Survey; prescribes avoidance and minimization measures (i.e., applicable Operational Protocols and Species-Specific Protocols); and records mitigation required to offset the impacts, if any, of a Covered Activity.
Preserve	Conserved lands within the Plan Area in a current, pending, or adopted regional habitat conservation plan, or other local, state, or federal conservation plan that are legally protected from future development (e.g., via conservation or open space easement, through acquisition, deed restriction, or other methods) for the purpose of protecting natural habitat, species, and open space and/or that are actively managed to protect the open space or natural resources into the future.
Proposed Preserve	Those lands within the Plan Area that are not yet legally conserved but are planned for conservation in a current pending or adopted regional plan, or other local, state, or federal conservation plan.
Restoration and Enhancement (R/E) Program	The Habitat Restoration and Enhancement Program detailed in Section 5.2 of the HCP Amendment.
Road Ruts	Man-made depressions or grooves worn into a road or path by travel and other seasonal depressions that are not vernal pools, but which may contain wildlife associated with vernal pools, such as fairy shrimp or western spadefoot, but not vernal pool plant indicator species.
Species-Specific Protocols	Those measures detailed in Section 5.1.13 of the HCP Amendment that are designed to avoid, minimize, and mitigate impacts from Covered Activities to 16 specifically identified Covered Species.
Subregional Plan	The 1995 San Diego Gas and Electric Company Habitat Conservation Plan and Natural Community Conservation Plan of this date herewith entered into by and among the Service, CDFW, and SDG&E and all the documents and instruments specifically attached thereto or incorporated therein by reference.
take	To harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct. 16 U.S.C.1538(a)(1). As used herein, "take" is limited to incidental take under the ESA.
Thinning	The selective removal of native vegetation to increase space between plants to reduce wildfire fuel loads.
Treatment Areas	Those locations where thinning is conducted pursuant to SDG&E's Wildfire Fuels Management Program.
Unforeseen Circumstances	Unforeseen Circumstances is defined in 50 C.F.R. 17.3 and means changes in circumstances affecting a species or geographic area covered by a conservation plan that could not reasonably have been anticipated by SDG&E or the Service and CDFW.

Term	Definition
Vernal Pool Clarification	The Minor Amendment granted by the Service and CDFW to SDG&E on July 26, 2004, regarding vernal pool resources located both on and off SDG&E access roads.
Vernal Pool Habitat	The term Vernal Pool habitat includes vernal pools, vernal pool complexes, and Vernal Pool Watersheds as more fully described in Section 5.1.11 of the HCP Amendment.
Vernal Pools	Seasonal, depression-type wetlands that result from a unique set of physical parameters and support a specific biological assemblage of plant and animal species. Functional vernal pool ecosystems form under specific physical conditions when small, shallow depressions collect precipitation to create a seasonally perched water table.
Wildfire Fuels Management	The suite of Covered Activities used by SDG&E as part of its Wildfire Fuels Management Program to reduce fire fuel load around distribution and transmission lines within the SDG&E service area.
Wildfire Fuels Management Program	A Wildfire Fuels Management effort that SDG&E launched as a pilot program in 2019.

INTRODUCTION TO THE FINAL ENVIRONMENTAL ASSESSMENT

Revisions have been made to the text of the Draft Environmental Assessment (EA) to create the Final EA. These revisions include some basic grammatical and editorial corrections that do not change or modify the information or meaning of the document content. However, some revisions to the text are in response to comments received on the Draft EA or have been made to provide clarification, updates, or revisions for consistency with the HCP Amendment. These revisions are minor and do not change the analysis or impact conclusions of the EA. The revisions of substance (i.e., not grammatical or editorial in nature) are listed in the table below.

Location in Final EA	Revision
Global revision	The previous total of 97 Operational Protocols was revised to 98 to account for the addition of a Species-Specific Protocol added for western spadefoot. Similarly, the previous breakdown of total new, updated, general, and Species-Specific Protocols have also shifted slightly with the addition of the new protocol plus some combining and addition of language related to lighting and invasive plants within protocol language.
Pages 1, 4	Language was revised to clarify that while 25 wildlife species are being addressed as Covered Species in the HCP Amendment, the Incidental Take Permit (ITP) will address incidental take of only 22 of the wildlife species since Covered Activities are not anticipated to result in incidental take of 3 wildlife Covered Species.
Page 14, Section 2.2.1.2	Text was added to clarify that alternative mitigation proposals that contribute to Covered Species and/or regional conservation could be used to offset or mitigate impacts. The added text also notes that the conservation strategy will include maintenance of easements for habitat connectivity per the Subregional Plan and abandoning and restoring SDG&E exclusive use access roads that are no longer required for safe and reliable access to Facilities.
Page 18	Text was added to clarify that during New Construction in Preserves and Proposed Preserves, if permanent impacts to critical habitat cannot be avoided, then SDG&E will first attempt to mitigate with credits in the existing mitigation lands that have critical habitat for the same species or acquire other lands that are designated as critical habitat. If no critical habitat is available from the existing mitigation lands or as an acquisition of new habitat lands, SDG&E will provide a justification for acquiring, restoring, and/or enhancing suitable habitat land that will benefit the species and/or its critical habitat, with the concurrence of the Service.
Page 20	The Habitat Restoration and Enhancement Section was expanded to further address how the Restoration and Enhancement Program can increase the value of biological resources in an impact area and the reduce spread of invasive weed species through eradicating invasive weed species populations in particular locations and stabilizing and/or seeding sites with native seed mixes to help prevent the introduction and spread of invasive weed species in areas of high-quality native habitat.
Table 3-2	Rows were added for arroyo toad nonbreeding upland habitat and western spadefoot upland habitat. Numbers were adjusted in the table as needed for consistency with the HCP Amendment analysis.

Location in Final EA	Revision
Table 3-3	Total designated critical habitat acres for Hermes copper butterfly was revised to be consistent with the HCP Amendment analysis.
Page 40	Text was added to specify that New Construction cannot impact vernal pool species, narrow endemic plant species, Laguna Mountains skipper, Hermes copper butterfly, arroyo toad, California red-legged frog; southwestern pond turtle, tricolored blackbird, western yellow-billed cuckoo, southwestern willow flycatcher, light-footed Ridgway's rail, Stephens' kangaroo rat, Peninsular bighorn sheep or Pacific pocket mouse; or more than 1.75 acres within a Preserve or Proposed Preserve without a Minor Amendment.
Page 49	Text was revised to clarify that permanent impacts from New Construction would be mitigated.
Page 50	Text was added to specify that Wildfire Fuels Management will focus on removing nonnative species, which can counteract the potential spread of invasive species along utility corridors and benefit the overall ecological value of the surrounding vegetation communities.
Table 3-6	Arroyo toad nonbreeding upland habitat row was added, western spadefoot breeding habitat row and upland habitat row was added to table. Tricolored blackbird and Stephen's kangaroo rat numbers were revised per the HCP Amendment analysis.
Page 60	Correction was made to state that permanent impacts to covered butterfly habitat would be mitigated in-kind at a 2:1 ratio if inside a Preserve or Proposed Preserve or 1:1 ratio if outside a Preserve or Proposed Preserve.
Page 61	Text was updated to specify that Species-Specific Protocols were included for California red-legged frog, western spadefoot, and southwestern pond turtle.
Page 65	Text was updated to include detailed mitigation ratios specific to avian species per the HCP Amendment and their location within or outside a Preserve or Proposed Preserve.
Page 72	Text was updated to include detailed mitigation ratios specific to mammal species per the HCP Amendment and their location in or outside a Preserve or Proposed Preserve.
Section 4.1	Text was updated to include additional information about the process for eagle remains found on Tribal trust lands for Tribes that hold a Native American Tribal Eagle Retention permit and the additional noticing provided to Tribes of the public review period.
Section 4.4	Section 4.4, Public Review was added to provide a description of the Draft EA public review process and comment period. The new section notes that the comment letters received and the responses are provided in Appendix B of the Final EA.
Appendix B	Appendix B was added to the Final EA to include the comment letters received on the draft documents and responses provided by the Service to those comments.

EXECUTIVE SUMMARY

San Diego Gas & Electric Company (SDG&E) is a California investor-owned utility company providing natural gas, electricity, and other services to customers within its 2,815,930-acre service area, which includes all of San Diego County and portions of Orange County and Riverside County (Moreno Compressor Station); see Figure 1. SDG&E's ability to provide these services depends on the operations and maintenance (O&M) of an evolving array of Facilities located throughout its service area. SDG&E performs regular maintenance and repair of these Facilities to prolong their useful life and ensure safe and reliable utility services. Both new and existing Facilities are subject to the regulatory authority and requirements of the California Public Utilities Commission (CPUC), and various other federal and state agencies.

Since 1995, SDG&E has performed its work in compliance with its Subregional Natural Community Conservation Plan and Habitat Conservation Plan (Subregional Plan; SDG&E 1995). SDG&E developed the Subregional Plan in collaboration with the U.S. Fish and Wildlife Service (Service) and California Department of Fish and Wildlife (CDFW). It was designed to avoid and minimize impacts to numerous wildlife and plant species and their habitats while allowing SDG&E to install, maintain, operate, and repair its existing gas and electric system and undertake typical expansion of the electric grid (Covered Activities).

The Service (and CDFW) approved the Subregional Plan in 1995 and on December 18, 1995, issued SDG&E an incidental take permit (ITP) (ITP No. PRT-809637) under section 10 of the Endangered Species Act (ESA). That permit authorized the "incidental take of 110 species in San Diego County and portions of Orange and Riverside County, California." It was subject to compliance with and implementation of the Subregional Plan. The Subregional Plan, in turn, "allow[ed] for up to 400 acres of impacts in natural areas before requiring a Plan amendment."

Approximately 64% of SDG&E's service area is in "High Fire Threat Districts" (CPUC 2021), which are areas of elevated or extreme risk for destructive utility-associated wildfires. Since 2007, SDG&E has greatly increased certain Covered Activities to reduce wildfire risk in its service area. This large-scale fire safety work has modified more habitat than was originally contemplated in 1995, thus necessitating an amendment to the Subregional Plan.

Accordingly, on March 3, 2022, SDG&E applied to the Service for an amended ITP. With that application, SDG&E included the required conservation plan, titled *Habitat Conservation Plan Amendment* (HCP Amendment; SDG&E 2023), which amends SDG&E's existing Subregional Plan. Under the HCP Amendment, SDG&E would continue to implement its Covered Activities in an environmentally sensitive manner by following a total of 98 Operation Protocols. These include 12 existing and 41 updated Operational Protocols carried forward from the 61 Operational Protocols from the Subregional Plan, as well as 45 new Operational Protocols, including 22 new Species-Specific Protocols.

Unlike in 1995, SDG&E's infrastructure is now largely in place, so future impacts are anticipated to be mainly associated with O&M of its existing system. These impacts would typically occur gradually and in small amounts across existing linear corridors on or near existing Facilities throughout SDG&E's service area over decades. New Construction, although less likely than in past decades, is restricted under the HCP Amendment to ensure impacts are avoided or minimized to the maximum extent practicable. The HCP Amendment also updates the species included in the Subregional Plan, provides additional data and analysis for each species, and expands the Plan Area to the entire 2,815,930-acre SDG&E service area. It also clarifies and expands the habitat restoration work that SDG&E may implement to restore and enhance habitat.

Because the proposed issuance of an ITP is a federal action that may affect the human environment, it is subject to review under the National Environmental Policy Act (NEPA). NEPA provides an interdisciplinary framework for federal agencies to evaluate environmental consequences of programs and projects over which they have discretionary authority. The Service's issuance of an ITP for SDG&E's Covered Activities in the HCP Amendment is the Proposed Action considered in this Environmental Assessment.

In issuing the ITP, the Service would not be authorizing SDG&E's Covered Activities, but rather the incidental take resulting from those Covered Activities performed in compliance with the HCP Amendment. If issued, the ITP would allow SDG&E to continue undertaking its Covered Activities, along with those associated with implementing the HCP Amendment, in accordance with the conservation strategy SDG&E has employed since 1995 and in compliance with the ESA.

The ITP would authorize the incidental take of Covered Species during implementation of the HCP Amendment through 2050. As with ITP No. PRT-809637, it would be subject to implementing the HCP Amendment as approved. The HCP Amendment aims to continue, modernize, and improve upon the conservation strategy that SDG&E has successfully implemented since 1995 under its Subregional Plan. As noted above, the HCP Amendment would require SDG&E to undertake Covered Activities in accordance with 98 Operational Protocols, developed with the Service and CDFW. These protocols are primarily based upon impact avoidance and minimization and recognize that minor adjustments during planning and execution of Covered Activities can yield major benefits to Covered Species and habitat. The HCP Amendment would allow no more than 820 acres of habitat impacts, including up to 400 acres of permanent habitat modification impacts, 210 acres of temporary habitat impacts, and 210 acres of habitat impacts from Wildfire Fuels Management, across SDG&E's service area through 2050.

As discussed in Chapter 3 of this EA, the Service's approval of the HCP Amendment as consistent with its regulations and issuance of an ITP would result in no significant impact on the human environment.

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CHAPTER 1

PURPOSE AND NEED

1.1 INTRODUCTION

The U.S. Fish and Wildlife Service (Service) prepared this Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA). This EA evaluates the effects of issuing an incidental take permit (ITP) under section 10(a)(1)(B) of the Federal Endangered Species Act of 1973, as amended (16 United States Code [U.S.C.] 1531 et seq.) (ESA) to San Diego Gas & Electric Company (SDG&E) for activities covered by SDG&E's *Habitat Conservation Plan Amendment* (HCP Amendment; Appendix A of this EA). Issuance of a section 10 ITP constitutes a discretionary federal action by the Service and is therefore subject to NEPA, which requires that federal agencies assess the effects of their actions on the human environment.

SDG&E, in coordination with the Service, prepared the HCP Amendment in compliance with section 10(a)(2)(A) of the ESA, which requires that any application for an ITP include a conservation plan that details the potential impacts on Covered Species (which may include federally listed or non-listed species) and the approach to minimize and mitigate those impacts to the maximum extent practicable. The Service's ITP would address 41 Covered Species and authorize incidental take of 22 wildlife species during implementation of SDG&E's HCP Amendment through 2050, including implementation of the conservation measures provided in the HCP Amendment. To meet document length requirements established with Secretarial Order 3355, this EA makes many references to content that is presented in detail in the HCP Amendment, which is available for public review online in Docket No. FWS-R8-ES-2022-0027 at <https://www.regulations.gov>.

The HCP Amendment includes an Eagle Conservation Plan (ECP) that SDG&E developed with the Service. The ECP provides the information required by the Bald and Golden Eagle Protection Act (BGEPA) (16 U.S.C. 668 and 50 C.F.R. 22) and the Service's Final Rule revising the regulations that govern its eagle take permit program (50 C.F.R. 13 and 22 and 81 Fed. Reg. 91,494) (2016 Eagle Rule; Service 2016a, 2016b) to continue including bald eagle (*Haliaeetus leucocephalus*) and golden eagle (*Aquila*

chrysaetos) as Covered Species under the HCP Amendment.¹ This proposal also conforms with, and carries out, the management approach analyzed in, and adopted subsequent to, the Service's Programmatic Environmental Impact Statement for the Eagle Rule Revision, December 2016 (PEIS; Service 2016a). Accordingly, this EA's analysis of eagle coverage tiers from the 2016 PEIS, and project-specific information not considered in the 2016 PEIS is considered in this EA.

1.2 BACKGROUND

SDG&E is an electric and natural gas utility company subject to regulations established by the California Public Utilities Commission (CPUC). As a regulated entity, SDG&E's Covered Activities are (1) required and undertaken in conformance with applicable state and federal laws and regulations and (2) necessary to provide adequate, reliable, and safe gas and electric service to the region. An overview of SDG&E's gas and electric system is included in Section 2.1 of the HCP Amendment and includes:

- Electric transmission lines (50 kilovolts to 500 kilovolts), which move bulk energy between substations around the system;
- Electric distribution lines (less than 50 kilovolts), which deliver electricity to industrial, commercial, and residential customers;
- Natural gas transmission pipelines (approximately 10 to 36 inches in diameter), which move high-pressure gas around the system;
- Natural gas distribution lines, which deliver natural gas to industrial, commercial, and residential customers; and
- Facilities to support the electric and gas lines, including electric switching stations and substations, and natural gas compressor stations, regulator stations, valve lots, and pressure limiting stations.

To serve new customer load and deliver energy reliably and safely to its customers, SDG&E must install, maintain, operate, and repair its existing gas and electric system and undertake typical expansion of the electric grid (Covered Activities). To that end, SDG&E performs required O&M on an ongoing basis and New Construction.

¹Applicants seeking an incidental take permit under Section 10(a)(1)(B) of ESA can choose to include bald and golden eagles on an incidental take permit application for an HCP. Doing so confers take authorization under BGEPA without the need for a separate permit.

In 1995, the Service, in coordination with the California Department of Fish and Wildlife (CDFW) (collectively referred to as the Wildlife Agencies), approved and issued SDG&E a 55-year ITP (No. PRT-809637) for the SDG&E *Subregional Natural Community Conservation Plan and Habitat Conservation Plan* (Subregional Plan, SDG&E 1995). For this, the Service prepared an EA and subsequent Finding of No Significant Impact (FONSI) which concluded that issuance of an ITP for the Subregional Plan would not result in significant effects on the human environment and that an Environmental Impact Statement would not be prepared.

The ITP for the Subregional Plan included 110 Covered Species and authorized incidental take of the 58 wildlife Covered Species resulting from impacts to 400 acres of habitat from Covered Activities in a 2,245,800-acre area in portions of San Diego, Orange, and Riverside Counties, California. The Subregional Plan includes 10 habitat or species-specific mitigation measures (Subregional Plan Section 3.1), 61 Operational Protocols (Subregional Plan Section 7.2), habitat enhancement measures (Subregional Plan Section 7.1), fee-owned rights-of-way (Subregional Plan Section 7.3), and mitigation credits (Subregional Plan Section 7.4) that SDG&E has implemented for the past 26 years.

In July 2004, the Wildlife Agencies approved a minor amendment to the Subregional Plan to clarify vernal pool mitigation measures (Vernal Pool Clarification). In August 2007, the Service also issued SDG&E a 50-year ITP (TE162969-0) for the *Low-Effect Habitat Conservation Plan for the Issuance of an Incidental Take Permit Under Section 10(a)(1)(b) of the Endangered Species Act for the Federally Endangered Quino Checkerspot Butterfly for the San Diego Gas and Electric Company* (Quino LEHCP) (SDG&E 2007).

Since 2007, SDG&E has increased its wildfire safety efforts to grid harden its system to reduce the risk of wildfire and enhance grid resilience, which have impacted more habitat than was originally contemplated in the Subregional Plan. As a result of these increased wildfire safety efforts, SDG&E determined that the 400 acres of habitat impacts authorized by the Subregional Plan may be inadequate to continue supporting Covered Activities for the remainder of the Subregional Plan term, which runs through 2050.

Accordingly, SDG&E began working with the Wildlife Agencies to amend its Subregional Plan to allow more impacts. To help ensure that it may continue work while developing the HCP Amendment, SDG&E prepared the *Low-Effect Habitat Conservation Plan for Areas Where San Diego Gas & Electric Company Conducts Its Routine Utility Operations*

& Maintenance Activities (2017 LEHCP) (SDG&E 2017). In March 2017, the Service issued SDG&E a 5-year ITP (TE26660C-0) for the 2017 LEHCP (SDG&E 2017). The Service's ITP for the 2017 LEHCP authorized an additional 60 acres of impacts to habitat supporting 37 Covered Species.

1.3 PROPOSED ACTION

The Proposed Action considered in this EA is the Service's issuance of a section 10(a)(1)(B) ITP related to SDG&E's Covered Activities based on implementation of conservation measures provided in the HCP Amendment. In issuing the ITP, the Service would not authorize SDG&E's Covered Activities, but rather the incidental take resulting from those activities. "Take" is defined in section 3 of the ESA [16 U.S.C. 1532(19)] and "incidental" is defined in the implementing regulations for section 7 of the ESA in (50 C.F.R. 402.02). Please refer to Chapter 2 of this EA for more details about the Service's Proposed Action and SDG&E's HCP Amendment, including Covered Activities and the conservation strategy.

This EA evaluates the impacts of issuing the ITP and implementing the HCP Amendment (Proposed Action). The Service's ITP would address 41 Covered Species and authorize the incidental take of 22 wildlife Covered Species located in San Diego County and portions of Orange County and Riverside County (Moreno Compressor Station), California, subject to compliance with and implementation of the HCP Amendment. The HCP Amendment carries forward and strengthens numerous conservation measures from the Subregional Plan and prescribes many more, all of which must be implemented and would provide greater protections to Covered Species and habitat than would occur without the conservation strategy detailed therein. The HCP Amendment would allow up to 400 acres of permanent habitat modification impacts, 210 acres of temporary habitat impacts, and 210 acres of habitat impacts from Wildfire Fuels Management across SDG&E's 2,815,930-acre service area through 2050.

This EA often references content presented in detail in the HCP Amendment and its appendices (SDG&E 2023), which are available for public review online in Docket No. FWS-R8-ES-2022-0027 at <https://www.regulations.gov>. For example, in the analysis of how biological resources may be affected by the Service's issuance of the ITP (Section 3.2.1 of this EA), impact analyses included in Chapter 4 of the HCP Amendment and Appendices A, B, and C to the HCP Amendment (SDG&E 2023) (collectively, the Covered Species Analysis) are integrated.

1.3.1 THE HCP AMENDMENT PLAN AREA AND PROBABLE IMPACT ZONE

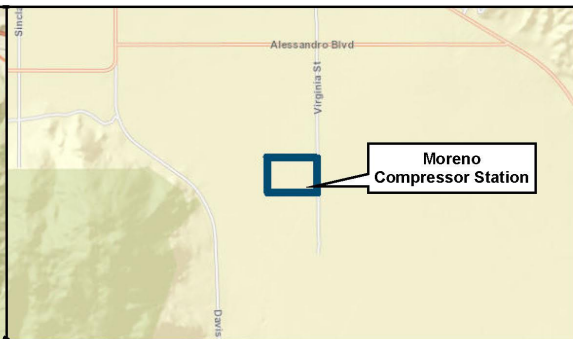
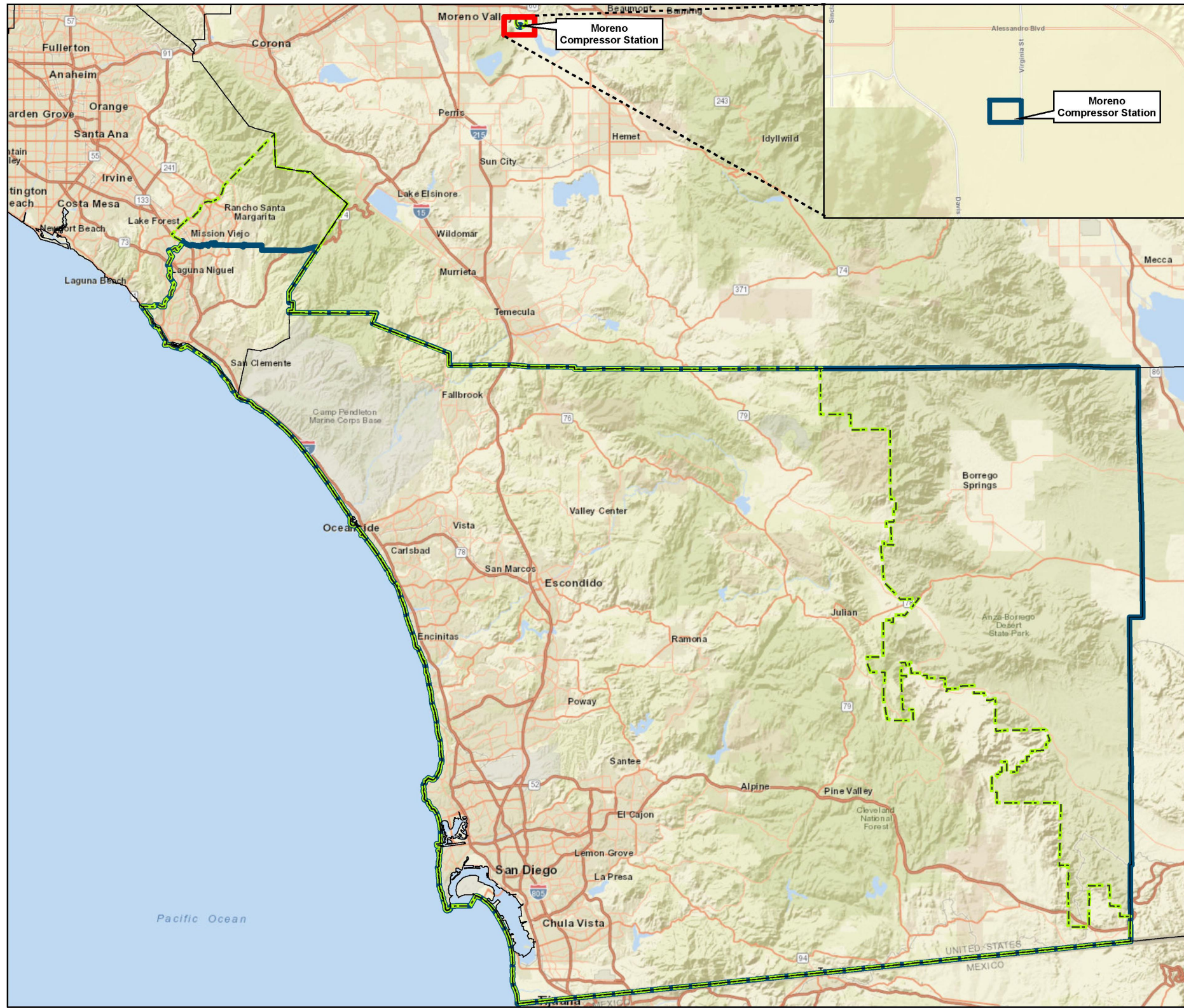
The Plan Area for the Subregional Plan includes 2,245,800 acres in portions of San Diego, Orange, and Riverside Counties, California. The Plan Area for the HCP Amendment includes the same portions of Orange and Riverside Counties previously covered by the Subregional Plan but was expanded to include all of San Diego County and is now 2,815,930 acres (Figure 1). Within the Plan Area, SDG&E Facilities are located, and Covered Activities occur, within rights-of-way for SDG&E's existing gas and electric transmission and distribution Facilities, lands owned by SDG&E and/or subject to SDG&E easements to maintain the Facilities, private access routes associated with SDG&E's O&M, and mitigation areas acquired to mitigate impacts resulting from Covered Activities under the HCP Amendment. Approximately 64% of SDG&E's service area is in "High Fire Threat Districts" as designated by the CPUC (CPUC 2021).

For the HCP Amendment, SDG&E developed the Probable Impact Zone (PIZ), which is the area encompassing SDG&E's Facilities where impacts from Covered Activities (with the possible exception of some New Construction) are expected to occur. More specifically, the PIZ corridors are measured from the center of easements and infrastructure and represent the maximum area within which Covered Activities at these Facilities are expected to occur. The PIZ encompasses approximately 352,909 acres, which is about 13% of the Plan Area.

1.4 COVERED SPECIES

The Subregional Plan covers 110 species, except when they occur in habitat within the jurisdiction of the U.S. Army Corps of Engineers (Corps) under section 404 of the Clean Water Act. As part of the HCP Amendment process, SDG&E, in collaboration with the Wildlife Agencies, evaluated whether any species should be removed or added based on the following four criteria: (i) whether the species was listed or likely to be listed during the remainder of the permit term; (ii) whether the species was currently known or expected to occur in the Plan Area; (iii) whether the species could be adversely affected by Covered Activities; and (iv) whether there was sufficient data and information available to adequately evaluate effects on the species and develop appropriate protocols for avoiding, minimizing, or mitigating impacts. As a result of this review, many species were removed, and the following four federally listed species were added: threatened Hermes copper butterfly (*Lycaena hermes*); endangered Laguna Mountains skipper (*Pyrgus ruralis lagunae*); threatened western yellow-billed cuckoo (*Coccyzus americanus*); and

endangered Peninsular bighorn sheep (*Ovis canadensis nelson*). It was also determined which species should have species-specific, narrow endemic plant, or vernal pool and road rut protocols. SDG&E prepared an ECP (Appendix B in the HCP Amendment) to continue to include golden eagles and bald eagles as Covered Species under the HCP Amendment. SDG&E also prepared an evaluation specific to Peninsular bighorn sheep (Appendix C in the HCP Amendment) to add it as a Covered Species under the HCP Amendment. Species proposed to be covered under the HCP Amendment include primarily those species that are federally listed/proposed as threatened or endangered, including under the California Endangered Species Act (CESA), and some non-federally or state listed species that are regionally sensitive and/or may become listed. In total, 41 species of plants (16 species) and wildlife (25 species) are proposed as the Covered Species in the HCP Amendment (Table 1-1).



**San Diego Gas & Electric
HCP Amendment
Environmental Assessment**
Plan Area
Figure 1

- Legend**
- 2022 Plan Area / SDG&E Service Area
 - 1995 Subregional Plan Area



Data Date: 03/13/2020 Version Date: 9/16/2021



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Table 1-1. HCP Amendment Covered Species List

Scientific Name	Common Name	ESA Listing Status ¹	CESA Listing Status ¹	Species-Specific Protocols (Y/N)	Narrow Endemic Plant Protocols (Y/N)	Vernal Pool and Road Rut Protocols (Y/N)
Plants (16)						
<i>Acanthomintha ilicifolia</i>	San Diego thorn-mint	T	E	N	Y	N
<i>Ambrosia pumila</i>	San Diego ambrosia	E	-	N	Y	N
<i>Arctostaphylos glandulosa</i> ssp. <i>crassifolia</i>	Del Mar manzanita	E	-	N	Y	N
<i>Baccharis vanessae</i>	Encinitas baccharis	T	E	N	Y	N
<i>Brodiaea filifolia</i>	Thread-leaved brodiaea	T	E	N	Y	N
<i>Chloropyron maritimum</i> ssp. <i>maritimum</i> (<i>Cordylanthus maritimus</i> ssp. <i>maritimus</i>)	Salt marsh bird's-beak	E	E	N	Y	N
<i>Chorizanthe orcuttiana</i>	Orcutt's spineflower	E	E	N	Y	N
<i>Deinandra conjugens</i> (<i>Hemizonia conjugens</i>)	Otay tarplant	T	E	N	Y	N
<i>Dudleya brevifolia</i>	Short-leaved dudleya	-	E	N	Y	N
<i>Eryngium aristulatum</i> var. <i>parishii</i>	San Diego button-celery	E	E	N	N	Y
<i>Monardella viminea</i> (<i>Monardella. Linoides</i> subsp. <i>viminea.</i>)	Willowy monardella	E	E	N	Y	N
<i>Navarretia fossalis</i>	Spreading navarretia	T	-	N	N	Y
<i>Nolina interrata</i>	Dehesa beargrass	-	E	N	Y	N
<i>Orcuttia californica</i>	California Orcutt grass	E	E	N	N	Y
<i>Pogogyne abramsii</i>	San Diego mesa mint	E	E	N	N	Y
<i>Pogogyne nudiuscula</i>	Otay Mesa mint	E	E	N	N	Y
Invertebrates (4)						
<i>Branchinecta sandiegonensis</i>	San Diego fairy shrimp	E	-	N	N	Y
<i>Streptocephalus woottoni</i>	Riverside fairy shrimp	E	-	N	N	Y
<i>Pyrgus ruralis lagunae</i>	Laguna Mountains skipper	E	-	Y	N	N
<i>Lycaena hermes</i>	Hermes copper butterfly	T	-	Y	N	N
Amphibians (3)						
<i>Anaxyrus californicus</i> (<i>Bufo microscaphus californicus</i>)	Arroyo toad	E	-	Y	N	N
<i>Rana draytonii</i> (<i>Rana aurora draytonii</i>)	California red-legged frog	T	-	Y	N	N
<i>Spea hammondi</i>	Western spadefoot	-	-	Y	N	Y

Scientific Name	Common Name	ESA Listing Status ¹	CESA Listing Status ¹	Species-Specific Protocols (Y/N)	Narrow Endemic Plant Protocols (Y/N)	Vernal Pool and Road Rut Protocols (Y/N)
Reptiles (2)						
<i>Actinemys pallida</i>	Southwestern pond turtle	-	-	Y	N	N
<i>Phrynosoma blainvillii</i>	Coast horned lizard	-	-	N	N	N
Birds (13)						
<i>Agelaius tricolor</i>	Tricolored blackbird	-	T	Y	N	N
<i>Athene cunicularia</i>	Burrowing owl	-	-	Y	N	N
<i>Aquila chrysaetos</i> ²	Golden eagle ²	-	-	Y ²	N	N
<i>Campylorhynchus brunneicapillus sandiegensis</i>	Coastal cactus wren	-	-	Y	N	N
<i>Charadrius nivosus nivosus (Charadrius alexandrinus nivosus)</i>	Western snowy plover [Pacific Coast [population Distinct Population Segment (DPS)]]	T	-	Y	N	N
<i>Coccyzus americanus</i>	Western yellow-billed cuckoo (western DPS)	T	E	Y	N	N
<i>Empidonax traillii extimus</i>	Southwestern willow flycatcher	E	E	Y	N	N
<i>Haliaeetus leucocephalus</i> ²	Bald eagle ²	-	E	Y ²	N	N
<i>Passerculus sandwichensis beldingi</i>	Belding's savannah sparrow	-	E	Y	N	N
<i>Polioptila californica californica</i>	Coastal California gnatcatcher	T	-	Y	N	N
<i>Rallus obsoletus levipes (Rallus longirostris levipes)</i>	Light-footed Ridgway's rail (light-footed clapper rail)	E	E	Y	N	N
<i>Sternula antillarum browni (Sterna antillarum browni)</i>	California least tern	E	E	Y	N	N
<i>Vireo bellii pusillus</i>	Least Bell's vireo	E	E	Y	N	N
Mammals (3)						
<i>Dipodomys stephensi</i>	Stephens' kangaroo rat	T	T	Y	N	N
<i>Ovis canadensis nelsoni</i>	Peninsular bighorn sheep	E	T	Y	N	N
<i>Perognathus longimembris pacificus</i>	Pacific pocket mouse	E	-	Y	N	N

¹ Listing Status: E = Endangered; T = Threatened

² Appendix B of the HCP Amendment contains the Eagle Conservation Plan (ECP) that has been developed for golden eagle and bald eagle. The ECP assesses eagle use in the Plan Area, estimates impacts, identifies avoidance and minimization measures, and provides a monitoring and mitigation approach to offset eagle impacts.

1.5 PURPOSE AND NEED

The purpose and need in considering the proposed action, are to fulfill the Service's legal obligations to respond to SDG&E's application for a section 10(a)(1)(B) ITP based on the Covered Activities while ensuring long-term conservation of Covered Species and their habitats as described in the HCP Amendment.

The purpose of an ITP is to exempt non-federal permit holders, such as states and private landowners, from the take prohibitions of section 9; it is not to authorize the activities, such as the HCP Amendment, that cause take. The Service's full scope of authority through the proposed action is limited to the issuance of the ITP for the Covered Activities in the applicant's habitat conservation plan and subsequent monitoring of the applicant's compliance with the terms of that permit.

The Service also considered the applicant's purpose to establish and implement a long-term agreement between SDG&E and the Service for the conservation of Covered Species and their habitats, while allowing SDG&E to develop, install, maintain, operate, and repair its Facilities, which are or become necessary to provide electric, natural gas, and other services in the Plan Area.

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CHAPTER 2 PROPOSED ACTION AND ALTERNATIVES

2.1 INTRODUCTION

As referenced in the Council on Environmental Quality's NEPA regulations regarding the contents of an EA [40 C.F.R. 1501.5(c)], NEPA requires federal agencies to develop, study, and briefly describe alternatives to any proposed action with the potential to result in unresolved resource conflicts. This chapter describes alternatives considered by the Service in this EA, specifically the Proposed Action and No Action Alternative, in detail, and briefly describes an alternative eliminated from further consideration.

2.2 ALTERNATIVES CONSIDERED

The Service and SDG&E considered two alternatives that would meet the Service's need, as well as SDG&E's objectives, while minimizing project-related environmental effects, including impacts to habitat in SDG&E's service area and impacts to/take of Covered Species.

2.2.1 PROPOSED ACTION

As described in Chapter 1, the Proposed Action considered herein is the Service's issuance of an ITP for incidental take resulting from Covered Activities identified in the HCP Amendment based on implementation of the conservation strategy provided therein. Additional details regarding the Covered Activities; construction methods and techniques; proposed measures to avoid, minimize, and mitigate adverse effects on the Covered Species and their habitats; and the overall conservation approach are provided in the HCP Amendment and its appendices. The HCP Amendment continues and improves upon the Subregional Plan's existing conservation strategy and monitoring, reporting, and adaptive management program to avoid, minimize, and mitigate for the potential effects of SDG&E's Covered Activities on Covered Species and their habitats. A summary of the HCP Amendment is provided below.

2.2.1.1 COVERED ACTIVITIES

As detailed in the HCP Amendment, Chapter 2, Covered Activities include two broad categories of work conducted by SDG&E on its natural gas and electric transmission and distribution systems that may result in impacts to/take of Covered Species and their habitats in the Plan Area: O&M and New Construction. Covered Activities also include biological surveys and handling of Covered Species as required to implement the HCP Amendment, as well as management activities on mitigation lands. Except for the addition of Wildfire Fuels Management and drones, Covered Activities proposed in the HCP Amendment are the same as those in the Subregional Plan.

O&M

Typical O&M includes inspecting, monitoring, and testing existing equipment; operating valves and switches; repairing and replacing existing Facilities, structures, wires, pipelines, and access roads; increasing the height above ground or the depth below ground of Facilities; replacing overhead lines with buried underground lines; and vegetation management, including tree removal and pruning. O&M for existing Facilities is anticipated to occur within the PIZ.

O&M — WILDFIRE FUELS MANAGEMENT

As detailed in the HCP Amendment, Chapter 2, SDG&E recently instituted a Wildfire Fuels Management program to reduce fire fuel load around distribution and transmission lines, which may in turn reduce the intensity of wildfires that traverse facility easements and rights-of-way. This program includes (1) removing nonnative vegetation, especially fire-promoting species, (2) removing dead woody vegetation, and (3) thinning select native vegetation with a focus on preserving habitat value and native species diversity. To ensure that native plant diversity at treatment sites does not change when thinning vegetation, the program targets commonly occurring or dominant native species within a given vegetation community for thinning. Wildfire Fuels Management for existing Facilities is anticipated to occur within the PIZ.

NEW CONSTRUCTION

Unlike in 1995, major SDG&E infrastructure is now in place and SDG&E anticipates building new Facilities at a far lower rate than prior decades. Therefore, SDG&E does not anticipate any new, large-scale construction in the near term or in future years requiring

coverage under the HCP Amendment. Nonetheless, New Construction is considered, with limits discussed below, because it is possible that construction of new electric, gas, or other power generation or storage Facilities may be planned, sited, or routed in the Plan Area. New construction may occur in or outside of the PIZ.

2.2.1.2 CONSERVATION STRATEGY

Unlike local jurisdictions that have completed regional HCPs, SDG&E does not control land use where it can plan development and a landscape-scale conservation strategy. Therefore, the conservation strategy of the HCP Amendment, as a continuation of the Subregional Plan strategy, first focuses on avoidance and minimization of impacts and then on mitigation for unavoidable impacts that will contribute to the conservation strategy of other regional HCPs. For this, the HCP Amendment includes general and species-specific Operational Protocols (as identified in Table 2-1 of this EA and detailed in Section 5.1 and Appendix C for Peninsular bighorn sheep of the HCP Amendment), minimization of New Construction in Preserves or Proposed Preserves, and implementation of eagle-specific avoidance and minimization measures per the ECP. When effects to Covered Species are unavoidable, SDG&E will offset or mitigate impacts via habitat restoration, Mitigation Credits or alternative mitigation proposals that contribute to Covered Species and/or regional conservation, and mitigation specific to eagles per the ECP. In addition, the conservation strategy will include maintenance of easements for habitat connectivity per the Subregional Plan and abandoning and restoring SDG&E exclusive use access roads that are no longer required for safe and reliable access to Facilities.

OPERATIONAL PROTOCOLS

The HCP Amendment includes a total of 98 Operational Protocols (identified in Table 2-1 of this EA and detailed in Section 5.1 of the HCP Amendment), 12 of which are existing Operational Protocols that were previously adopted under the Subregional Plan. The HCP Amendment also includes 41 Operational Protocols from the Subregional Plan that have been updated, as well as 45 new Operational Protocols that were developed in coordination with the Wildlife Agencies to improve avoidance and minimization of impacts to and conservation of Covered Species and their habitats. Of the 45 new Operational Protocols, 5 are general, 17 are for vernal pools and road ruts, 1 is for narrow endemic plants, and 22 are for specific Covered Species.

**Table 2-1. HCP Amendment Operational Protocols:
Revision Status and General Topic(s)**

Protocol Number¹	Status²	Topic³
1	New	Environmentally-sensitive area avoidance
2	Updated	Speed limit enforcement; designated turnaround areas
3	Existing	Wildlife harm prohibition
4	Updated	Firearm prohibition
5	Existing	Wildlife feeding prohibition
6	Updated	Personnel pet prohibition in SDG&E right-of-way
7	Existing	Parking/driving under oak trees prohibition
8	Existing	Plant/wildlife species collection prohibition
9	Updated	Littering prohibition
10	Updated	Wildfire prevention/minimization
11	Updated	Biologist consultation for environmental issues, invasive weed control
12	Updated	Employee training program participation
13	Updated	Operations review and protocol modification coordination with the Service
14	New	Biologist Pre-activity Surveys for Covered Activities
15	Updated	Biologist habitat boundary and construction area demarcation
16	Updated	Erosion and sedimentation minimization
17	Updated	Visual inspections best practices
18	Existing	Gas transmission line marker replacement best practices
19	Existing	Erosion minimization using water bars
20	Updated	Flooding, ponding, and erosion/siltation avoidance/minimization
21	Updated	Perpendicular wetland habitat crossing, new Facility siting requirements
22	Updated	Temporary stream diversion and erosion control
23	Updated	Wetland impact minimization via pollutant runoff prevention, soil/brush relocation
24	Updated	Limiting construction/maintenance equipment, vehicles, and insulator washing to access roads/cleared areas
25	New	Minimization of night lighting effects
26	New	Exclusion of exotic plants from landscaping, use of drought-tolerant plants, and pest inspection
27	Updated	Biologist approval of non-emergency brush clearing
28	Updated	Biologist Pre-activity Surveys and recommendations for impact minimization from wire stringing
29	Existing	Erosion control on cut and fill slopes
30	Updated	Spoils disposal/re-use and cleared vegetation disposal
31	Updated	Environmentally sensitive tree trimming location identification; Biologist Pre-activity tree trimming surveys
32	Updated	Biologist consultation for previously unidentified den, burrow, and plant avoidance/impact minimization
33	Updated	Biologist approval of unavoidable habitat disturbance and biological monitoring to verify compliance with Pre-activity Survey Report (PSR)
34	Updated	Biologist enforcement of mowing limitations

Protocol Number¹	Status²	Topic³
35	Updated	Supplies/equipment inspection/capping for wildlife entrapment/harm avoidance
36	Updated	Trench/excavation inspection for wildlife entrapment avoidance
37	Updated	Fugitive dust control via watering and speed limits
38	New	Pest control limitations
39	Updated	Access road erosion repair best practices
40	Updated	Access road vegetation control limitations
41	Existing	Access road mowing best practices
42	Updated	Roadbed expansion avoidance during access road maintenance
43	Updated	Biologist approval of road rut filling material
44	Updated	Access road design and construction standards
45	Existing	Access road availability for regional preserve managers
46	Updated	Disturbance minimization from new access roads
47	Existing	Access control on access roads within preserves
48	Updated	Nesting season avoidance and impact minimization during new access road construction
49	Updated	Streambed, marsh, soft sand, and open water avoidance during access road construction
50	Existing	Waterway filling restrictions for maintenance/construction vehicle access
51	Updated	Avoidance of staging/storage in riparian areas
52	Updated	Footpaths/line-of-sight brush clearing limitations
53	Updated	Panel point placement brush clearing limitations
54	Existing	Allowance of hiking off roads or paths for surveys
55	Updated	Operational protocol compliance to fullest extent possible during emergency repairs
56	Updated	Unavoidable environmental damage reporting to Biologist and subsequent mitigation
57	Updated	Fee owner action exclusion from HCP Amendment coverage
58	Updated	SDG&E lack of opposition to underlying fee owner dedication of property for conservation purposes
Vernal Pool and Road Rut Protocols		
59	New	Vernal pool/vernal pool watershed avoidance; mitigation exception for vehicular traffic through dry vernal pools
60	New	Surveys or conference with the Service for potential unavoidable vernal pool habitat impacts
61	New	Mitigation for unavoidable permanent impacts to occupied vernal pools
62	New	Mitigation for unavoidable permanent impacts to unoccupied vernal pools
63	New	Soil (inoculum) and plant seed salvage in impacted vernal pools
64	New	Biological monitoring and best management practices for construction next to vernal pools
65	New	Wet weather avoidance for grading next to vernal pools
66	New	Avoidance of vehicular traffic and foot traffic in vernal pools/complexes
67	New	Work area minimization in vernal pools located above gas lines
68	New	Construction fueling, staging, and maintenance precautions near vernal pools

Protocol Number¹	Status²	Topic³
69	New	Minor Amendment coverage for vernal pool and vernal pool Covered Species new project impacts
70	New	Road rut/man-made depression avoidance
71	New	Surveys/occupation assumption for unavoidable impacts to road ruts/man-made depressions
72	New	Mitigation for permanent impacts to occupied road ruts/man-made depressions
73	New	No mitigation for impacts to unoccupied road ruts/man-made depressions
74	New	Soil (inoculum) collection in occupied road ruts
75	New	Grading precautions and biological monitoring in wet soils
Narrow Endemic Plant Protocols		
76	New	Narrow endemic plant avoidance/impact minimization and mitigation
Species-Specific Protocols		
77	New	Laguna Mountains skipper avoidance/impact minimization and mitigation
78	New	Hermes copper butterfly avoidance/impact minimization and mitigation
79	New	Arroyo toad avoidance/impact minimization and mitigation
80	New	California red-legged frog avoidance/impact minimization and mitigation
81	New	Southwestern pond turtle avoidance/impact minimization and mitigation
82	New	Tricolored blackbird avoidance/impact minimization and mitigation
83	New	Burrowing owl avoidance/impact minimization and mitigation
84	New	ECP golden eagle protocols
85	New	Coastal cactus wren avoidance/impact minimization and mitigation
86	New	Western snowy plover avoidance/impact minimization
87	New	Western yellow-billed cuckoo avoidance/impact minimization and mitigation
88	New	Southwestern willow flycatcher avoidance/impact minimization and mitigation
89	New	ECP bald eagle protocols
90	New	Belding's Savannah Sparrow avoidance/impact minimization and mitigation
91	New	Coastal California gnatcatcher avoidance/impact minimization
92	New	Light-footed Ridgway's rail avoidance/impact minimization and mitigation
93	New	California least tern avoidance/impact minimization
94	New	Least Bell's vireo avoidance/impact minimization and mitigation
95	New	Stephens' kangaroo rat avoidance/impact minimization and mitigation
96	New	Peninsular bighorn sheep avoidance/impact minimization and mitigation
97	New	Pacific pocket mouse avoidance/impact minimization and mitigation
98	New	Western spadefoot avoidance/impact minimization and mitigation

¹Protocols are numbered and detailed in Section 5.1 of the HCP Amendment.

²“Existing” = protocol carried forward from 1995 Subregional Plan with no changes; “updated” = protocol carried forward from 1995 Subregional Plan with changes; “new” = protocol not present in the 1995 Subregional Plan.

³General topic(s) of protocol provided. More detail is included in Section 5.1 of the HCP Amendment.

Covered Activities within Preserves and Planned Preserves

SDG&E has operated Facilities in the Plan Area for more than 100 years, and many of its Facilities pre-date regional planning efforts. Accordingly, some SDG&E Facilities and rights-of-way are located within areas later designated as Preserves by other entities as part of their conservation plans or are within Proposed Preserves. Under the HCP Amendment, SDG&E would conduct O&M in these areas in accordance with all applicable Operational Protocols (including Species-Specific Protocols).

SDG&E would also minimize New Construction in Preserves and Proposed Preserves, including designated critical habitat, and design future projects to avoid or minimize impacts, while maintaining SDG&E's ability to meet service demands and the obligations of a utility company serving the public (HCP Amendment Section 5.4.2). If permanent impacts to critical habitat cannot be avoided, then SDG&E will first attempt to mitigate with credits in the existing mitigation lands that have critical habitat for the same species or acquire other lands that are designated as critical habitat. If no critical habitat is available from the existing mitigation lands or as an acquisition of new habitat lands, SDG&E will provide a justification for acquiring, restoring, and/or enhancing suitable habitat land that will benefit the species and/or its critical habitat, with the concurrence of the Service. Where SDG&E determines that new Facilities with impacts greater than 1.75 acres are necessary within part of a Preserve or Proposed Preserve, SDG&E will:

- Provide the Service written notice of its intent to install such Facilities. The written notice will contain a detailed description of such Facilities and their location, along with a map of the area. At a minimum, the information collected as part of the Pre-activity Survey Report (PSR) is required. Review of the proposed Facility and Service approval would occur via the Minor Amendment process outlined in HCP Amendment Section 6.5.1.2.
- Coordinate with the Service and the appropriate preserve manager (if applicable), to plan and construct such new Facilities in a manner that avoids or minimizes any impacts to a Preserve or Proposed Preserve, to the extent possible, while not impairing SDG&E's ability to meet the service demands of its customers in accordance with its responsibilities as a public utility.

TAILORED CONSERVATION FOR BALD AND GOLDEN EAGLES

The ECP (Appendix B of the HCP Amendment) provides a framework for avoiding and minimizing eagle fatalities from electrocutions or collisions from existing infrastructure. It

further provides measures to avoid and minimize potential take from “disturb[ance]” related to Covered Activities. Avoidance and minimization measures for eagles include establishing limited operating periods during the eagle breeding season, establishing no-disturbance nest buffers during the breeding season that restrict disturbance-causing activities that generate noise or significant activity by crews, machinery and equipment within a certain radius around in-use nests, and training of field personnel.

As part of its efforts to make its system more avian safe over time, SDG&E retrofits Facilities with avian protection equipment, reconfigures the structure of the pole to increase conductor spacing or other adjustments to reduce potential eagle fatality, and/or replaces and rebuilds existing poles according to Avian Power Line Interaction Committee (APLIC) Guidelines to minimize potential impacts to eagles (APLIC 2006, 2012).

Compensatory mitigation for impacts to eagles is required when all authorized and permitted take exceeds the annual allotment within an EMU. SDG&E’s estimated take for bald eagles would not exceed annual take limits; therefore, compensatory mitigation is not required for this species (see ECP Section 6.2.2). Even so, SDG&E has a responsibility to avoid and minimize impacts to eagles and rectify problems within their system. In the event of direct fatality of a bald eagle caused by contact with SDG&E Facilities, SDG&E would conduct reactive pole retrofitting at the incident pole where the take occurred to ensure no further electrocutions could occur on the pole in question.

Take limits for golden eagles are set at zero throughout the United States; therefore, all permits for golden eagle take must incorporate compensatory mitigation. The ECP outlines SDG&E’s proposal and schedule to retrofit poles to make them safe for golden eagles. Unlike other Covered Species where habitat impacts can be satisfied through the acquisition and management of Mitigation Credits, the primary form of mitigation that benefits and sustains eagle populations is the retrofitting of utility poles to make them avian safe. SDG&E’s ECP estimates the amount of take that could occur from nest disturbance, electrocution, and collision and following agency guidance for preparing an ECP, forecasts the number of utility poles that would need to be retrofitted to offset the take of eagles. SDG&E’s ECP proposes both short-term and long-term retrofits that would be installed or constructed based on potential schedules in the ECP (see ECP Section 6.2.1, Mitigation, Tables 7 and 8). Additionally, as required by regulation(s), a mitigation effectiveness monitoring framework is outlined in the ECP that allows for third-party verification of the retrofit installations as directed by the Service in coordination with SDG&E.

HABITAT RESTORATION AND ENHANCEMENT

The HCP Amendment details a Restoration and Enhancement (R/E) Program that SDG&E will use primarily to mitigate temporary habitat impacts, but also be used to mitigate permanent impacts, from Covered Activities (HCP Amendment Section 5.2). Habitat restoration and enhancement can increase the value of biological resources in an impact area, reduce spread of invasive weed species, and reduce habitat fragmentation for Covered Species and other species that may benefit from habitat connectivity. The goal of the R/E Program is to sustain and, where possible, increase the habitat value of sensitive vegetation communities throughout SDG&E's Plan Area. To accomplish this goal, the R/E Program seeks to establish native vegetation that will continue to propagate, mature, and expand after maintenance and monitoring are complete.

The R/E Program would be conducted under the direction of a habitat restoration specialist using one of three approaches: onsite restoration, onsite enhancement, or offsite restoration. Onsite restoration or enhancement would be done to restore areas temporarily impacted by Covered Activities to their pre-activity condition. Enhancement is less involved than restoration as it does not involve installing native plants via seeding or planting. Enhancement for permanent impacts may include eradicating invasive weed species populations in particular locations. The potential for introduction and spread of invasive weed species will be considered for site selection, especially for temporary impacts in high-quality native habitat. Offsite restoration would be conducted on a case-by-case basis in coordination with the Service. This option would be considered when restoration/enhancement might be more beneficial at an offsite location, such as restoring a large contiguous site versus many small disjunct temporary impact areas. Should SDG&E choose not to restore temporary impact areas or should restored areas not achieve success standards, then these areas would be treated as permanent impacts, and mitigated as such, consistent with the HCP Amendment. However, when not included in the R/E Program, sites will be stabilized and/or may be seeded with native seed mixes to help prevent the introduction and spread of invasive weed species in areas of high-quality native habitat.

SDG&E ACCESS ROAD REMOVAL

Within the Plan Area, SDG&E uses and maintains a system of roads to access Facilities. The HCP Amendment acknowledges that certain access roads could potentially be realigned or removed entirely to improve local biological resources without sacrificing safe and reliable access to SDG&E Facilities. Accordingly, the HCP Amendment provides a

process for SDG&E to work in coordination with the Service and the landowner (if applicable) to review the continuing functionality of access roads, address concerns regarding existing access roads, and remove and restore certain roads to native vegetation where appropriate (HCP Amendment Section 5.3).

MITIGATION CREDITS

Under the Subregional Plan, Mitigation Credits were to be established by SDG&E providing funds for the procurement of high-quality habitat to help meet region-wide conservation goals. As such, the Mitigation Credits served as mitigation for both in-kind and out-of-kind covered species and habitat impacts, without regard to the type and biological value of the habitat impacted. At the outset of the Subregional Plan, SDG&E provided the Wildlife Agencies with funds to enable the procurement of approximately 240 acres of high-quality habitat that is now part of the San Diego National Wildlife Refuge. Then, in April 2015, SDG&E purchased an additional 114 acres of Mitigation Credit of high-value habitat from the Cielo B property that was obtained by The Escondido Creek Conservancy.

As of the effective date of the HCP Amendment, SDG&E anticipates having remaining Mitigation Credits from either acquisition that have not been used to offset impacts to the originally authorized 400 acres of habitat modification. Except for wetlands, vernal pool, narrow endemic, and species-specific mitigation as discussed above, SDG&E may use these credits to mitigate impacts associated with Covered Activities for all Covered Species and their associated habitats as defined in Table 5.4 of the HCP Amendment.

During the remaining term of the HCP Amendment, SDG&E would ensure that available habitat-based Mitigation Credits would suffice to provide mitigation for at least 2 years of projected impacts. If available Mitigation Credits are anticipated to be insufficient to offset those projected impacts, SDG&E would acquire additional Mitigation Credits in coordination with the Service through land acquisition or alternative means detailed in Section 5.5.3 of the HCP Amendment. SDG&E would also identify and reach agreement for species-specific mitigation prior to impacts (HCP Amendment Section 5.5). Mitigation properties would be protected and managed for species conservation in perpetuity (HCP Amendment Section 9.1.3).

SDG&E would debit Mitigation Credits from its mitigation account to compensate for permanent impacts from Covered Activities at the ratios given in Section 5.5.1 of the HCP Amendment. In contrast to the Subregional Plan, the HCP Amendment requires SDG&E

to provide species-specific and vernal pool mitigation as shown in Tables 5.4 and 5.5 of the HCP Amendment.

2.2.2 NO ACTION ALTERNATIVE

Under the No Action Alternative, the Service would not issue an ITP to SDG&E and the HCP Amendment would not be implemented. Under this alternative, SDG&E would continue implementing Covered Activities under its existing Subregional Plan and ITP until the 400-acre of impact limit in natural areas is met. There would be no clarification or expansion of the restoration activities that SDG&E can implement to successfully restore temporary impacts. The Subregional Plan would continue to provide coverage over approximately 2,245,800 acres and not expand the Plan Area to encompass the entire 2,815,930-acre SDG&E service area as proposed by the HCP Amendment.

The original 61 Operational Protocols implemented by SDG&E per the Subregional Plan would remain the same. Updates to 41 existing Operational Protocols and the introduction of 45 new Operational Protocols (including 22 Species-Specific Protocols) as proposed in Section 5.1 of the HCP Amendment to reduce and/or minimize impacts to Covered Species and their habitats would not be required. The 110 species included in the Subregional Plan would continue to be covered, but Hermes copper butterfly, Laguna Mountains skipper, western yellow-billed cuckoo, and Peninsular bighorn sheep, four species proposed for coverage under the HCP Amendment, would not be covered. Moreover, the framework provided in the ECP, Appendix B to the HCP Amendment, for avoiding and minimizing eagle fatalities from interactions with existing infrastructure and from potential disturbance related to Covered Activities, would not be approved.

Once the 400-acre of impact limit in natural areas is met, SDG&E would thereafter conduct O&M (including Wildfire Fuels Management) and New Construction as required by applicable law. SDG&E would likely continue to try to avoid impacts on ESA-listed species and eagles; however, a total reduction of effects—including to non-listed species and habitat—would likely not be achieved because of the public safety, regulatory, and site-specific requirements needed to complete O&M and New Construction.

The need for ESA section 7 consultation or a section 10 HCP would be evaluated on a project-by-project basis for all O&M and New Construction. Where a federal nexus existed, SDG&E would likely seek to have its activities included in ESA section 7 consultation. Where a federal nexus did not exist, SDG&E would determine whether to

seek incidental take authorization as appropriate through ESA section 10, which would require development and public review of a project-specific HCP and associated NEPA document, as well as negotiation with the Service regarding appropriate mitigation.

Due to the condition of SDG&E's existing infrastructure and public safety risks associated with compromised infrastructure integrity and loss of service, there is generally a high volume of O&M required to be completed at any given time, some of which is under strict state and federal regulatory timeframes to ensure public safety. The large volume and need for prompt repair make implementation of project-by-project permitting challenging, inefficient, costly, and susceptible to causing schedule delays. Given the time and staffing resources required to prepare and evaluate individual section 7 consultations or section 10 HCPs, vital O&M, including critical fire safety work, may be delayed, or undertaken pursuant to the emergency provisions of the ESA.

A project-by-project conservation approach would also likely include protections for fewer species and result in implementation of fragmented conservation strategies with decreased benefits to fewer species. By comparison, the mitigation approach under the Proposed Action alternative would include more comprehensive conservation strategies for all the Covered Species, as well as coordinated avoidance and minimization measures and mitigation actions that, in combination, result in enhanced conservation practices. Landscape-level and regional-level mitigation, as well as wildfire safety activities, also benefits non-covered species, both those that may need some level of conservation, as well as common and abundant species.

2.3 ALTERNATIVE ELIMINATED FROM FURTHER CONSIDERATION

While developing what ultimately became the HCP Amendment, the Service and SDG&E considered the alternative described below, which was reviewed and eliminated from further analysis because it did not meet the Service's purpose and need and/or SDG&E's objectives.

2.3.1 PRESERVE 1995 SUBREGIONAL PLAN – INCREASE ALLOWABLE ACRES OF IMPACTS

Under this alternative, the Service's ITP No. PRT-809637 would still include 110 species and authorize incidental take of the covered wildlife species in portions of San Diego, Orange, and Riverside Counties, California. The authorization would again be subject to

compliance with and implementation of the Subregional Plan. The Subregional Plan, in turn, would be amended to allow for up to 820 additional acres of habitat modification through 2050.

This alternative would retain numerous species that are neither listed nor expected to be listed. It would not include coverage for federally listed species in the Plan Area such as Hermes copper butterfly, Laguna Mountains skipper, western yellow-billed cuckoo, and Peninsular bighorn sheep.

The Service generally does not recommend including (or continuing to cover) common species and strongly recommends including federally listed/proposed species that are likely to occur in the Plan Area. Under this alternative, the Subregional Plan would also not include improvements to implementation and conservation, including species-specific, narrow endemic, and vernal pool protocols, as discussed in the Proposed Action. Therefore, this alternative was eliminated from further consideration.

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CHAPTER 3 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

NEPA and its implementing regulations require agencies to analyze the environmental impacts of proposed federal actions on the human environment. The affected environment is a concise description of existing resource conditions and trends that may be affected by a proposed action or an alternative. Here, the Proposed Action is the Service's issuance of an ITP for SDG&E's Covered Activities in the Plan Area, including implementation of conservation measures provided in the HCP Amendment. See Section 2.2.1.1, Covered Activities, of this EA and Chapter 2 of the HCP Amendment for a discussion of the Covered Activities.

3.1 EXISTING CONDITIONS

This section describes existing conditions in the Plan Area, as defined in the HCP Amendment, to establish the baseline condition that would persist with or without the Proposed Action. SDG&E has existing gas and electric infrastructure in the Plan Area that would remain unchanged in SDG&E's existing utility easements, fee properties, and rights-of-way. The location of SDG&E's existing gas and electric Facilities in the Plan Area is part of existing environmental conditions.

3.1.1 EXISTING FACILITIES

The majority of SDG&E's gas and electric infrastructure in the Plan Area is already in place and must remain in or near SDG&E's existing utility rights-of-way.

3.1.1.1 EXISTING OPERATING CONDITIONS

SDG&E is a California investor-owned utility (IOU) company subject to the jurisdiction of the CPUC. As such, SDG&E is required to "furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities... as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public." (California Public Utilities Code § 451). As described in Section 2.2.1.1, SDG&E must perform ongoing O&M in the PIZ to maintain the gas and electric system safely and efficiently in the greater Plan Area.

Many of SDG&E's routine O&M actions are prescribed by state or federal laws or standards or are necessary to ensure public safety (California Public Resources Code 4292–4293; CPUC General Order [GO] 95; North American Electric Reliability Corporation [NERC] Standards FAC-003-3; CPUC GO 112-F; and 49 C.F.R. 191, 192, 193, and 199). These regulations govern the design, construction, testing, and O&M of gas pipeline systems in California. Thus, SDG&E cannot defer necessary O&M on existing Facilities. Without issuance of the ITP, SDG&E would continue performing these activities in compliance with state and federal environmental laws and regulations, including obtaining environmental permits when required.

3.1.1.2 EXISTING REGULATORY ENVIRONMENT

If a project involves construction of electrical facilities by an IOU, it is governed by CPUC GO 131-D. GO 131-D sets forth a tiered permitting regime for electric generation facilities, electric transmission and distribution line facilities, substations, and other electrical facilities, and establishes that local discretionary authority over such projects is preempted. In addition to setting the regulatory standards for many of SDG&E's construction, operation, and maintenance activities, CPUC GO 131-D also requires permitting and site-specific environmental review of SDG&E's work, such as construction of transmission line extensions and substation expansions beyond the utility-owned substation property.

SDG&E's Covered Activities are also subject to the jurisdiction of other state and federal agencies when they affect agency-jurisdictional resources or area. The Service's issuance of the ITP would not change SDG&E's obligation to comply with all state and federal laws and permitting requirements, nor would it change permitting triggers or the obligations of state and federal agencies to comply with relevant laws and regulations. Nor does the HCP Amendment alter SDG&E's land rights for existing Facilities, or any notification and coordination procedures that have been established (or may be established in the future) with public and private landowners where SDG&E has existing Facilities.

Moreover, if SDG&E undertakes Covered Activities on federal land or its work otherwise triggers a federal action (i.e., it is funded, permitted, or authorized in whole or part by any federal agency [action agency]), the ITP does not relieve that federal agency of its obligation to consult with the Service under ESA section 7 if the action may affect federally listed species. The Service anticipates that future consultations will be streamlined for

projects that are consistent with the HCP Amendment. To help facilitate future section 7 consultations, SDG&E has included template letters and a template Biological Evaluation outline in Appendix H of the HCP Amendment.

3.1.2 SCOPE OF THE ANALYSIS

The Service lacks jurisdiction over individual activities carried out by SDG&E. Thus, in issuing the ITP, the Service would not authorize SDG&E to conduct Covered Activities. Rather, the ITP would authorize incidental take of Covered Species that could result from SDG&E engaging in those activities. Without the ITP, SDG&E would continue to perform the same activities proposed for coverage under the HCP Amendment. Following exhaustion of the 400 acres of allowed habitat impacts under the Subregional Plan, SDG&E would need to seek project-by-project ESA section 7 consultations or section 10 HCPs as needed. Therefore, this EA uses this scenario as the “No Action Alternative” and analyzes environmental impacts on the human environment resulting from issuance of the ITP as the “Proposed Action.”

Because the Proposed Action is not a new project, but rather a continuation, modification, and improvement of the permitting and conservation strategy to ongoing work currently undertaken pursuant to the Subregional Plan, the scope of the NEPA analysis considers how impacts from Covered Activities may change because of issuance of the ITP and implementation of the HCP Amendment. The analysis describes the environmental impacts of ongoing O&M as part of the current baseline that would continue under both the Proposed Action and No Action Alternative.

Although SDG&E’s O&M would be undertaken within or immediately adjacent to the footprint of SDG&E’s existing Facilities within the PIZ, New Construction could occur outside of the PIZ. The location, scope, and configuration of SDG&E’s New Construction will be determined by the needs and requirements of the gas and electric system, the customers SDG&E serves, and appropriate environmental review to identify project alternatives with the least environmental impact. As stated above, SDG&E does not anticipate any new, large-scale construction in the near term or in future years requiring coverage under the HCP Amendment. However, to be conservative, the impact analysis for the HCP Amendment assumes impacts from New Construction will occur outside of the PIZ at the same rate as has occurred under the Subregional Plan. The analysis also assumes the land-cover types in impacted areas outside of the PIZ would be similar to those currently found in existing utility corridors within the PIZ.

Management activities on mitigation lands may be conducted to increase the habitat value of the mitigation properties for the benefit of the species. Some temporary adverse impacts could occur during habitat restoration and management activities, particularly any that involve use of machinery and equipment. These activities are Covered Activities under the HCP Amendment and are also considered in the impact analysis of this EA.

3.1.2.1 RESOURCE AREAS NOT INCLUDED IN THE EA

As noted above, the Proposed Action continues and strengthens the permitting and conservation approach currently undertaken pursuant to the Subregional Plan. Accordingly, the NEPA analysis considers how impacts from Covered Activities may *change* because of issuance of the ITP and implementation of the HCP Amendment. Under the HCP Amendment, SDG&E will continue its O&M as under baseline conditions, except for Wildfire Fuels Management. The Wildfire Fuels Management Program is designed to remove nonnatives and trim/thin natives to mirror early successional lands within the PIZ. Because SDG&E does not expect any new large-scale New Construction to seek coverage under the HCP Amendment, the Proposed Action is expected to result in little to no change from baseline conditions for aesthetics/visual resources; agricultural resources; air quality and climate change; environmental justice; geology, soils, and palaeontologic resources; hydrology and water quality; land use and planning; noise; public health and environmental hazards; public services; public utilities and service systems; recreation; socioeconomics; and transportation. Therefore, these resource areas are not included for further analysis in the EA.

3.1.2.2 RESOURCE AREAS INCLUDED IN THE EA

Two resource areas where Covered Activities may cause more than minimal potential impacts on the human environment are biological resources and cultural resources. These are discussed in more detail below. However, as detailed below, the Proposed Action is not likely to change how SDG&E currently performs the Covered Activities such that there will be a significant impact on the human environment.

3.1.3 CUMULATIVE IMPACT ASSESSMENT METHODOLOGY

The cumulative impact analysis in the following resource sections of effects on the environment resulting from the incremental effect of the Proposed Action, when added to other past, present, and reasonably foreseeable future actions regardless of what agency

(federal or non-federal) or person undertakes such other actions, addresses both the combined effects resulting from more than one action and those resulting solely from the additive effect of repeated Covered Activities under the Proposed Action. Both types of effects are analyzed based on professional judgment informed by current standards of care specific to each resource topic. Consistent with prior Council on Environmental Quality's cumulative effects guidance, the analysis focuses on aspects of regional cumulative effects to which the Proposed Action has the potential to contribute; cumulative effects to which the Proposed Action will not contribute are not discussed or analyzed in detail.

The geographic boundaries of the cumulative effects area are generally those of the Plan Area, adjusted as appropriate based on the nature of the resources affected and the distance that such effects may travel. As an example, increased sedimentation of waterways that results from a project is limited to the watershed in which it occurs. As a result, it is only necessary to examine effects within that watershed. In contrast, air quality emissions from a project can travel over far greater distances and, therefore, necessitate analysis on a county, air basin, or regional level.

There are two approaches to identifying cumulative projects and their associated impacts. The list approach identifies individual projects in order to identify potential cumulative impacts. The projection approach uses a summary of projections to identify potential cumulative impacts. This EA uses the projection approach because the list approach is infeasible given the number of local jurisdictions responsible for reviewing and approving development projects in the HCP Amendment Plan Area, and the fact that the Covered Activities are not prescribed to occur at a specific time and location. Although Chapter 2 of this EA and the HCP Amendment both describe the types of Covered Activities that SDG&E will implement under the Proposed Action in the Plan Area, it is important to note that the specific locations, timing, or extent of these activities have not yet been specifically identified. Rather, although the HCP Amendment will facilitate the Service's permitting process as it relates to impacts to/take of Covered Species, the HCP Amendment does not set forth a detailed construction program that would aid in the assessment of cumulative effects. Nonetheless, it is assumed that Covered Activities will be implemented in conjunction with projects implemented by both public and private entities throughout the Plan Area during the 2050 permit term of the HCP Amendment.

Continued human population growth in the HCP Amendment Plan Area is expected to drive further development of agriculture, forestry, cities, industry, transportation, and

water resources in the foreseeable future. The cumulative impact analysis in each section below considers the potential for the Proposed Action to result in a cumulatively considerable contribution to impacts for each resource area.

3.2 BIOLOGICAL RESOURCES

3.2.1 AFFECTED ENVIRONMENT

Biological resources evaluated in this section include vegetation communities and other land cover types (e.g., urban/developed), and the 41 total species considered for coverage (i.e., Covered Species) under the HCP Amendment.

3.2.1.1 VEGETATION COMMUNITIES AND OTHER LAND COVER TYPES IN THE PLAN AREA AND PIZ

The 2,815,930-acre Plan Area contains a vast array of vegetation communities and other land cover types as shown in Table 3-1 (also detailed in Section 4.1.3.1, and Appendices E and F of the HCP Amendment). The predominant vegetation community in the Plan Area is uplands (approximately 68% of the Plan Area). Approximately 28% of the Plan Area consists of “Other Land Cover Types” (e.g., agriculture, disturbed habitat, eucalyptus woodland, and urban/developed), and the remaining 4% of the Plan Area is composed of riparian and wetlands vegetation communities. Within uplands, chapparral is the most common land cover type and represents 29% of the total Plan Area acreage. Urban/developed land is the most common “other land cover type” and is 23% of the total Plan Area acreage. Riparian and wetlands represent only 4% of the Plan Area, of which riparian forest/woodland is the most common but only represents 2% of the total Plan Area. Figure 6 of the HCP Amendment shows the distribution of vegetation communities within the Plan Area.

Unlike the broader Plan Area, approximately 87% of vegetation communities in the PIZ—where most impacts from Covered Activities are expected to occur—is Other Land Cover Types (Table 3-1). Approximately 11.9% of the PIZ is considered uplands, of which chapparral and coastal scrub comprise approximately 70% of the upland habitat. Overall, chapparral covers approximately 4.4% of the PIZ, while coastal scrub covers 3.8% of the overall PIZ. The remaining 1.2% of the PIZ is covered by riparian and wetlands.

**Table 3-1. Vegetation Communities and Other Land Cover Types
within the Plan Area and PIZ**

Vegetation Communities and Other Land Cover Types	Plan Area Acres	Percent of Total Plan Area	PIZ Acres	Percent of Total PIZ
<i>Riparian and Wetlands</i>	119,154	4.231	4,093	1.160
Alkali Playa	2,007	0.071	-	-
Beach/Coastal Dunes/Saltpan/Mudflats	1,319	0.047	94	0.027
Disturbed Wetland	191	0.007	24	0.007
Marsh	5,946	0.211	317	0.090
Meadows and Seeps	10,635	0.378	122	0.035
Non-Vegetated Channel	2,718	0.097	51	0.014
Open Water	26,418	0.938	438	0.124
Riparian Forest/Woodland	58,972	2.094	2,365	0.670
Riparian Scrub	10,875	0.386	670	0.190
Vernal Pools	72	0.003	13	0.004
<i>Uplands</i>	1,902,591	67.565	41,881	11.867
Badlands	46,075	1.636	-	-
Chaparral	822,591	29.212	15,592	4.418
Coastal Scrub	230,825	8.197	13,571	3.845
Desert Dunes	895	0.032	-	-
Desert Scrub	456,690	16.218	2,024	0.574
Forest/Woodland	203,954	7.243	2,461	0.697
Grasslands	130,350	4.629	7,917	2.243
Great Basin Scrub	11,212	0.398	315	0.089
<i>Other Land Cover Types</i>	794,185	28.203	306,935	86.973
Agriculture	139,636	4.959	10,594	3.002
Disturbed Habitat	13,719	0.487	2,370	0.672
Eucalyptus Woodland	2,348	0.083	650	0.184
Urban/Developed	638,482	22.674	293,321	83.115
Total¹	2,815,930	100.000	352,909	100.000

¹ Values may not total due to rounding after summation.

3.2.1.2 COVERED SPECIES

As stated above, a total of 41 species of plants (16 species) and wildlife (25 species) are proposed as the Covered Species in the HCP Amendment (Table 1-1). Covered Species Analysis is included as Appendix A of the HCP Amendment and details specific information and analysis (e.g., background, presence, potential impacts, etc.) for each of the Covered Species under the HCP Amendment except for golden eagle, bald eagle, and Peninsular bighorn sheep. The analysis estimated approximate acreage of suitable habitat for Covered Species in the Plan Area using habitat models as discussed in Section 4.1.3.1 of the HCP Amendment. This habitat model generates outputs based on the

habitat requirements for each species.² Specifically, the habitat model considers six key environmental factors: vegetation, soil type, soil texture, elevation, slope, and ecoregion.

Appendix B of the HCP Amendment contains the ECP developed for golden eagle and bald eagle. The ECP reviewed and analyzed known golden and bald eagle nest locations within the Plan Area and PIZ. The ECP provides specific information and analysis (e.g., background, presence, potential impacts, etc.) related to bald and golden eagles.

Appendix C of the HCP Amendment contains an evaluation for Peninsular bighorn sheep that details specific information and analysis (e.g., background, presence, potential impacts, etc.) for this species. The evaluation estimated approximate acreage of suitable habitat for Peninsular bighorn sheep in the Plan Area using essential habitat as defined and shown in the *Recovery Plan for Bighorn Sheep in the Peninsular Ranges, California* (Service 2000).

Table 3-2 summarizes modeled and essential habitat within the Plan Area and PIZ for each Covered Species, except for golden eagle and bald eagle. All Covered Species occur within the PIZ. Table 3-3 summarizes critical habitat within the Plan Area and PIZ for each applicable Covered Species.

PLANTS

The definition of “take” under the ESA does not apply to listed plants. Before the Service issues a permit, however, the effects of the Proposed Action on ESA-listed plants must be analyzed because section 7 of the ESA requires that issuance of an ITP not jeopardize any listed species, including plants.

² Pacific pocket mouse habitat was estimated based on suitable habitat data layer provided by Marine Corps Base Camp Pendleton.

Table 3-2. Covered Species Habitat in the Plan Area and PIZ

Scientific Name	Common Name	ESA Status ¹	Modeled Habitat in Plan Area (Acres)	Modeled Habitat in the PIZ (Acres)	Percentage of PIZ Supporting Modeled Habitat ²
Plants (16)					
<i>Acanthomintha ilicifolia</i>	San Diego thorn-mint	T	43,598.13	4,959.73	10.19%
<i>Ambrosia pumila</i>	San Diego ambrosia	E	9,687.10	676.83	1.39%
<i>Arctostaphylos glandulosa</i> ssp. <i>crassifolia</i>	Del Mar manzanita	E	4,435.99	858.52	1.76%
<i>Baccharis vanessae</i>	Encinitas baccharis	T	46,669.96	1,599.70	3.29%
<i>Brodiaea filifolia</i>	Thread-leaved brodiaea	T	8,424.05	1,090.49	2.24%
<i>Chloropyron maritimum</i> ssp. <i>maritimum</i> (<i>Cordylanthus maritimus</i> ssp. <i>maritimus</i>)	Salt marsh bird's-beak	E	659.38	29.13	0.06%
<i>Chorizanthe orcuttiana</i>	Orcutt's spineflower	E	1,847.97	320.70	0.66%
<i>Deinandra conjugens</i> (<i>Hemizonia conjugens</i>)	Otay tarplant	T	2,074.93	369.66	0.76%
<i>Dudleya brevifolia</i>	Short-leaved dudleya	-	2,007.85	346.59	0.71%
<i>Eryngium aristulatum</i> var. <i>parishii</i>	San Diego button-celery	E	6,411.79	603.68	1.24%
<i>Monardella viminea</i>	Willow monardella	E	14,891.11	1,464.11	3.01%
<i>Navarretia fossalis</i>	Spreading navarretia	T	6,411.79	603.68	1.24%
<i>Nolina interrata</i>	Dehesa beargrass	-	2,295.68	123.82	0.25%
<i>Orcuttia californica</i>	California Orcutt grass	E	4,559.70	831.83	1.71%
<i>Pogogyne abramsii</i>	San Diego mesa mint	E	2,536.16	341.16	0.70%
<i>Pogogyne nudiuscula</i>	Otay Mesa mint	E	691.32	115.89	0.24%
Invertebrates (4)					
<i>Branchinecta sandiegonensis</i>	San Diego fairy shrimp	E	7,153.19	785.41	1.61%
<i>Streptocephalus woottoni</i>	Riverside fairy shrimp	E	8,075.11	1,153.42	2.37%
<i>Pyrgus ruralis lagunae</i>	Laguna Mountains Skipper	E	1,172.46	13.50	0.03%
<i>Lycaena hermes</i>	Hermes copper butterfly	T	503,764.71	18,195.00	37.39%
Amphibians and Reptiles (5)					
<i>Anaxyrus californicus</i> (<i>Bufo microscaphus californicus</i>)	Arroyo toad – breeding and nonbreeding riparian habitat ³	E	26,702.02	1,176.17	2.42%
<i>Anaxyrus californicus</i> (<i>Bufo microscaphus californicus</i>)	Arroyo toad – nonbreeding upland habitat ³	E	1,323,401.31	47,674.56	97.96%
<i>Rana draytonii</i> (<i>Rana aurora draytonii</i>)	California red-legged frog	T	61,071.29	2,620.41	5.38%

Scientific Name	Common Name	ESA Status ¹	Modeled Habitat in Plan Area (Acres)	Modeled Habitat in the PIZ (Acres)	Percentage of PIZ Supporting Modeled Habitat ²
<i>Spea hammondi</i>	Western spadefoot – breeding habitat	-	39,348.14	2,159.64	4.44%
<i>Spea hammondi</i>	Western spadefoot – upland habitat ⁴	-	1,183,765.51	37,080.81	76.20%
<i>Actinemys pallida</i>	Southwestern pond turtle	-	48,245.92	2,366.10	4.86%
<i>Phrynosoma blainvillii</i>	Coast horned lizard	-	933,391.29	26,019.18	53.47%
Birds (13)					
<i>Agelaius tricolor</i>	Tricolored blackbird	-	21,116.41	692.87	1.42%
<i>Athene cunicularia hypugaea</i>	Burrowing owl	-	218,361.64	6,519.36	13.40%
<i>Aquila chrysaetos</i> ⁴	Golden eagle ⁴	-	NA	NA	NA
<i>Campylorhynchus brunneicapillus sandiegensis</i>	Coastal cactus wren	-	133,326.07	10,895.07	22.39%
<i>Charadrius nivosus nivosus</i> (<i>Charadrius alexandrinus nivosus</i>)	Western snowy plover	T	1,685.26	178.91	0.37%
<i>Coccyzus americanus occidentalis</i>	Western yellow-billed cuckoo	T	13,110.66	963.16	1.98%
<i>Empidonax traillii extimus</i>	Southwestern willow flycatcher	E	46,030.28	2,228.06	4.58%
<i>Haliaeetus leucocephalus</i> ⁴	Bald eagle ⁴	Delisted	NA	NA	NA
<i>Passerculus sandwichensis beldingi</i>	Belding's savannah sparrow	-	1,292.30	108.28	0.22%
<i>Polioptila californica californica</i>	Coastal California gnatcatcher	T	95,162.97	7,365.30	15.13%
<i>Rallus obsoletus levipes</i> (<i>Rallus longirostris levipes</i>)	Light-footed Ridgway's rail	E	3,661.38	307.80	0.63%
<i>Sternula antillarum browni</i> (<i>Sterna antillarum browni</i>)	California least tern	E	519.67	85.92	0.18%
<i>Vireo bellii pusillus</i>	Least Bell's vireo	E	36,832.29	1,798.65	3.70%
Mammals (3)					
<i>Dipodomys stephensi</i>	Stephens' kangaroo rat	T	52,039.43	574.04	1.18%
<i>Ovis canadensis nelson</i> ⁵	Peninsular bighorn sheep ⁵	E	429,424	923	1.90%
<i>Perognathus longimembris pacificus</i>	Pacific pocket mouse	E	2,557.00	183.00	0.38%

NA = not applicable

¹ Endangered Species Act (ESA): E = Endangered; T = Threatened

² The portion of the PIZ that consists of undeveloped habitat totals 48,665 acres. Modeled habitat within the PIZ was divided by the total undeveloped habitat in the PIZ to quantify this percent.

³ The County of San Diego Species Habitat Model for arroyo toad consist of riparian breeding habitat along the banks of a stream and non-breeding riparian habitat (i.e., riparian habitat outside the banks of a stream channel would not

be considered breeding habitat). To estimate nonbreeding upland habitat for arroyo toad, all grassland, agriculture, coastal sage scrub, and chaparral within the Plan Area and PIZ was considered suitable nonbreeding upland habitat.
⁴ The overall extent of suitable upland habitat within the Plan Area for spadefoot is overestimated as it includes all grassland, coastal sage scrub, and chaparral within the Plan Area and PIZ, regardless of if it is adjacent to breeding habitat.

⁴ Acreages of modeled habitat were not calculated for golden and bald eagles. Instead, an analysis of eagle use and nesting territories in the Plan Area was conducted in support of an Eagle Conservation Plan (Appendix B in the HCP Amendment).

⁵ Acreages of modeled habitat for Peninsular bighorn sheep are based on essential habitat as described in Appendix C in the HCP Amendment.

Table 3-3. Critical Habitat in the Plan Area and PIZ

Scientific Name	Common Name	Total Designated Critical Habitat	Plan Area (acres)	PIZ (acres)	Percentage of Total Critical Habitat within the PIZ
Plants (6)					
<i>Acanthomintha ilicifolia</i>	San Diego thorn-mint	671	671	12	2%
<i>Ambrosia pumila</i>	San Diego ambrosia	783	594	124	16%
<i>Brodiaea filifolia</i>	Thread-leaved brodiaea	2,950	1,558	211	7%
<i>Deinandra conjugens</i> (<i>Hemizonia conjugens</i>)	Otay tarplant	6,333	6,333	770	12%
<i>Monardella viminea</i>	Willow monardella	122	122	3	2%
<i>Navarretia fossalis</i>	Spreading navarretia	6,725	1,068	69	1%
Wildlife (10)					
<i>Branchinecta sandiegonensis</i>	San Diego fairy shrimp	2,933	2,918	218	7%
<i>Streptocephalus woottoni</i>	Riverside fairy shrimp	1,670	914	21	1%
<i>Lycaena hermes</i>	Hermes copper butterfly	35,052	35,052	2,436	7%
<i>Pyrgus ruralis lagunae</i>	Laguna Mountains Skipper	6,259	6,259	83	1%
<i>Anaxyrus californicus</i> (<i>Bufo microscaphus californicus</i>)	Arroyo toad	98,428	64,133	3,613	4%
<i>Charadrius nivosus nivosus</i> (<i>Charadrius alexandrinus nivosus</i>)	Western snowy plover	25,263	405	14	<1%
<i>Empidonax traillii extimus</i>	Southwestern willow flycatcher	209,131	5,373	246	<1%
<i>Poliioptila californica californica</i>	Coastal California gnatcatcher	197,427	80,372	6,313	3%
<i>Vireo bellii pusillus</i>	Least Bell's vireo	36,991	13,416	2,038	6%
<i>Ovis canadensis nelson</i>	Peninsular bighorn sheep	376,938	261,489	661	<1%

As shown in Table 3-2, there are 16 Covered Species of plants within the Plan Area and PIZ. Of these, 14 are ESA listed. Within the Plan Area and PIZ, there is designated critical habitat for six plant species, which is depicted in Figure 2-2 of the Covered Species Analysis. Designated critical habitat within the PIZ represents a small portion of all designated critical habitat for covered plants (1% to 16% depending on species; see Table 3-3).

Of the 16 plants, SDG&E in coordination with the Service designated 11 as narrow endemics and 5 as vernal pool species. The narrow endemic plants have limited ranges with more specialized or restrictive habitat requirements. Vernal pool species are generally located in specific clay soils often on mesa tops and clustered in several regions within the Plan Area and PIZ. The majority of vernal pool species are located outside the PIZ, but there are vernal pool complexes within the PIZ at locations such as Del Mar Mesa Preserve, Torrey Highlands Vernal Pool Open Space, west Mira Mesa, Otay Mesa, and Marine Corps Air Station Miramar. Both the Narrow Endemic and Vernal Pool and Road Rut Protocols (identified in Table 2-1 of this EA and detailed in Section 5.1 of the HCP Amendment) were developed to standardize the avoidance, minimization, and mitigation measures across each category of plants.

Figure 2-1 of the Covered Species Analysis depicts locations of Covered Species of plants according to regional databases (California Natural Diversity Database and Service database occurrences between 1990 and 2020). The highest densities of known plant locations are along the coastal and foothill ecoregions within the Plan Area and PIZ.

INVERTEBRATES

As shown in Table 3-2, four Covered Species of invertebrates are within the Plan Area and PIZ, and are all ESA listed. Figure 3-1 of the Covered Species Analysis depicts locations of Covered Species of invertebrate according to regional databases. San Diego fairy shrimp and Riverside fairy shrimp are vernal pool branchiopods and are restricted to vernal pool and road rut locations. The Service has designated critical habitat for all four invertebrates in the Plan Area and PIZ, which is depicted in Figure 3-2 of the Covered Species Analysis. Designated critical habitat within the PIZ represents a small portion of all designated critical habitat for covered invertebrates (1% to 7% depending on species; see Table 3-3).

AMPHIBIANS AND REPTILES

As shown in Table 3-2, three Covered Species of amphibians and two reptiles are within the Plan Area and PIZ. Of these, two—arroyo toad and California red-legged frog—are ESA listed. Figure 4-1 of the Covered Species Analysis depicts the locations of these amphibians and reptiles according to regional databases. Of the proposed Covered Species of amphibians, California red-legged frog, was previously extirpated but was recently reintroduced in a small lake on a privately owned ranch in northern San Diego County, and the other two amphibian species have restricted ranges based on proximity to suitable breeding habitats.

California red-legged frog has habitat within the PIZ, but the reintroduced location is not within the PIZ. The potential exists for this species to expand within the Plan Area and PIZ in the future. The Service has designated critical habitat for one amphibian species, arroyo toad, within the Plan Area, which is depicted in Figure 4-2 of the Covered Species Analysis. Approximately 4% of total designated arroyo toad critical habitat occurs within the PIZ (Table 3-3).

BIRDS

As shown in Table 3-2, 13 Covered Species of birds are within the Plan Area and PIZ. Of these, seven are ESA listed. Figure 5-1 of the Covered Species Analysis depicts locations of these bird species according to regional databases. In general, Covered Species of birds are more common along the coast and foothill regions with high amounts of urbanization. The Service designated critical habitat for four bird species within the Plan Area, which is depicted in Figure 5-2 of the Covered Species Analysis. Designated critical habitat within the PIZ represents a small portion of all designated critical habitat for covered birds (<1% to 6% depending on species; see Table 3-3).

Occurrence information about bald and golden eagles within the Plan Area is provided in the ECP (Appendix B of the HCP Amendment). In the Plan Area (which is contiguous with the ECP Area) in San Diego County, the majority of golden eagle habitat is found in southern foothills, northern mountains, and central foothills ecoregions. In the portion of the Plan Area in Orange County, golden eagle habitat is mainly found in the Orange County foothill and valley ecoregion. Golden eagle nesting territories within the PIZ include one or more in the following general areas (from north to south): San Mateo Canyon, Palomar Mountain, Mendenhall Valley, Aguanga Mountains, Pamo Valley, Lake Henshaw, Bandy Canyon, Iron Mountain, San Vicente Reservoir, El Cajon Mountain,

Loveland Reservoir, Bell Bluff, Lyon's Valley, Barrett Reservoir, Lawson's Peak, Morena Butte, Corte Madera Mountain, Glen Cliff/Buckman Springs, and Thing Valley. To help protect the species, the exact location and number of territories are kept confidential and are not provided on map within this EA.

The majority of bald eagle habitat within San Diego County occurs in the central foothills, southern valley, and central valley ecoregions; the majority of bald eagle habitat within Orange County is within the Orange County foothill and valley ecoregion. In total, four bald eagle nesting territories have been identified within the Plan Area, all of which are in San Diego County and overlap with the PIZ. These nesting locations include Corte Madera, Lake Henshaw, Lake Wohlford, and in the Ramona grasslands.

MAMMALS

As shown in Table 3-2, three Covered Species of mammal—Pacific pocket mouse, Stephens' kangaroo rat, and Peninsular bighorn sheep—are within the Plan Area and PIZ and all are ESA listed. The Service has designated critical habitat for Peninsular bighorn sheep within the Plan Area, which is depicted in Figure 1 of Appendix C of the HCP Amendment. Approximately <1% of total designated Peninsular bighorn sheep critical habitat occurs within the PIZ (Table 3-3). These species have extremely restricted ranges that are highly correlated to vegetation type, land cover, and soil type. Figure 6-1 of the Covered Species Analysis and Figure 1 of Appendix C of the HCP Amendment depict locations of these Covered Species of mammals according to regional databases.

3.2.1.3 NON-COVERED SPECIES

In addition to the Covered Species, the Plan Area includes potential habitat for five federally listed wildlife species and four federally listed plant species that are not proposed for coverage in the HCP Amendment. Section 3.1 of the HCP Amendment discusses criteria for coverage, and Appendix D of the HCP Amendment explains why these and other species covered under the Subarea Plan are not included as covered species in the HCP Amendment.

For wildlife, the Quino checkerspot butterfly was not covered because the Service has already issued SDG&E an ITP for the species associated with SDG&E's Quino LEHCP. The Quino LEHCP minimized and mitigated the effects of Covered Activities on the species over the 50-year term of the Service's permit. The desert pupfish (*Cyprinodon macularius*), unarmored threespine stickleback (*Gasterosteus aculeatus williamsoni*),

tidewater goby (*Eucyclogobius newberryi*), and Southern California steelhead (*Oncorhynchus mykiss*) were not covered because most Covered Activities would be within upland habitat. In addition, SDG&E avoids working in open water that provides habitat for these species. Desert pupfish and unarmed threespine stickleback in the PIZ are introduced populations within areas that can be avoided. Southern California steelhead and tidewater goby occur within open water habitat that is traversed by the PIZ, but Covered Activities would not occur in these areas. Moreover, if Covered Activities were to occur in habitat for listed fish species, SDG&E would have no authorization to take listed species. If such Covered Activities required a discretionary federal action, for example a Clean Water Act section 404 permit from the U.S. Army Corps of Engineers, the federal agency would be required to consult with the Service or National Marine Fisheries Service (Southern California steelhead) to ensure its action was not likely to jeopardize the continued existence of any ESA-listed species or destroy or adversely modify critical habitat (where designated).

For plants, the Laguna Beach dudleya (*Dudleya stolonifera*), Mexican flannelbush (*Fremontodendron mexicanum*), San Bernardino bluegrass (*Poa atropurpurea*), and big-leaved crownbeard (*Verbesina dissita*), were not covered because they generally occur in highly restricted areas where nearby SDG&E Facilities are located within previously disturbed/developed areas, and SDG&E would avoid known locations of these species.

The Proposed Action is not anticipated to result in a significant adverse effect on non-covered species. Impacts from most Covered Activities are expected to be small scale, temporary, and dispersed over linear utility rights-of-way for O&M, and SDG&E does not anticipate any new, large-scale construction in the near term or in future years requiring coverage under the HCP Amendment. New Construction cannot permanently impact western snowy plover or California least tern habitat. In addition, New Construction cannot impact vernal pool species, narrow endemic plant species, Laguna Mountains skipper, Hermes copper butterfly, arroyo toad, California red-legged frog; southwestern pond turtle, tricolored blackbird, western yellow-billed cuckoo, southwestern willow flycatcher, light-footed Ridgway's rail, Stephens' kangaroo rat, Peninsular bighorn sheep or Pacific pocket mouse; or more than 1.75 acres within a Preserve or Proposed Preserve without a Minor Amendment. These limitations reduce potential impacts to non-covered species that inhabit the same areas as those Covered Species.

Non-covered species would likely benefit from the conservation strategy implemented under the HCP Amendment. For instance, the HCP Amendment's Operational Protocols, which include Narrow Endemic Plant, Vernal Pool, and Species-Specific Protocols, avoid, minimize, and mitigate impacts to Covered Species and likewise protect non-covered species occupying those same habitats. Similarly, because many non-covered species occur in the same habitats as Covered Species, protections for Covered Species provided through SDG&E's Pre-activity Survey process (HCP Amendment Sections 5.1.3 and 6.3.2) would likely also benefit non-covered species.

Wildfire Fuels Management reduces fuel loads and reduces the risk of wildfire, which could also benefit some non-covered species. Restoration and habitat mitigation requirements described in Sections 5.2 and 5.5 of the HCP Amendment would also benefit non-covered species. In addition, species-specific in-kind mitigation that may be required for Covered Species with Species-Specific Protocols would benefit non-covered species with similar habitat/ecological requirements.

With implementation of Operational Protocols (identified in Table 2-1 of this EA and detailed in Section 5.1 of the HCP Amendment) as well as other state and federal resource protection laws, the Proposed Action would not likely result in incidental take of non-covered species. Moreover, the Proposed Action would not substantially degrade habitat of non-covered species, including designated critical habitat. The Proposed Action would not reduce the populations of any plant or animal species below levels for maintaining viability at the local or regional level, either through incidental take or substantial habitat loss or modification. Therefore, impacts on non-covered species are not further addressed in this EA.

3.2.2 ENVIRONMENTAL CONSEQUENCES

3.2.2.1 METHODOLOGY FOR IMPACT ANALYSIS

SDG&E developed a multi-layered approach to analyze potential impacts of the Proposed Action on Covered Species and their habitats. SDG&E detailed the impact analysis process in Chapter 4 of the HCP Amendment. The Service analyzed impacts to Covered Species based on an independent review and evaluation of that analysis.

SDG&E analyzed nearly three decades of historical permanent and temporary impact data that detailed acreages of habitat impacts that have occurred under the Subregional

Plan. These records included 23 years of SDG&E data that reported permanent and temporary impacts resulting from both O&M and New Construction from 1996 through 2018. SDG&E assumed that impacts from future O&M and New Construction would be consistent with historical averages. Using this approach, SDG&E estimated that annual O&M and New Construction habitat impacts through 2050 would average approximately 4.81 acres of permanent impacts and 6.73 acres of temporary impacts annually because of Covered Activities, for a combined average of 11.54 acres of impacts per year.

To estimate the proportion of permanent impacts that could arise from New Construction versus O&M impacts, SDG&E analyzed historical data for New Construction impacts from 1996 through 2018 (HCP Amendment Section 4.1.3.2). Those data showed that the average permanent impacts from New Construction totaled approximately 2.21 acres per year. Going forward, SDG&E assumed all New Construction would occur outside the PIZ. Even though future New Construction is not expected to occur at the same rate as in the past, to be conservative it multiplied the 2.21 acres by 30 years, yielding a total 66.3 acres of permanent impacts. These impacts were estimated to occur to habitat from New Construction outside the PIZ, which represents approximately 16.6% of the overall 400 acres of permanent impacts to habitat.

To estimate impacts from Wildfire Fuels Management, SDG&E considered data from its 2019 pilot program. Those data showed that on average, for every 100 acres treated, 9 acres of native vegetation cover was removed, and 2 acres of nonnative vegetation cover was removed. Because removal of nonnative vegetation benefits Covered Species and their habitat and promotes the establishment of native vegetation, the average acreage of nonnative vegetation cover loss was subtracted from the acreage of native vegetation cover loss, yielding a net vegetation cover loss of 7 acres per 100 acres treated. Assuming up to 100 acres of land would undergo Wildfire Fuels Management annually over the next 30 years and applying a rate of habitat impacts consistent with 2019 data, 7 acres of habitat impacts would occur annually. Therefore, approximately 210 acres of Wildfire Fuels Management impacts are expected through 2050. Most impacts are expected to occur within upland habitats, primarily chaparral.

To generate species-specific habitat impact estimates, SDG&E used habitat models to estimate the approximate acreage of Covered Species habitat (i.e., suitable habitat) in the Plan Area.³ It then established the PIZ and used geographic information system (GIS)

³ Acreages of modeled habitat for Peninsular bighorn sheep are based on essential habitat (Service 2000) as described in Appendix C in the HCP Amendment.

software to overlay the undeveloped portion of the PIZ (48,665 acres) on Covered Species habitat models. This quantified the proportion of the PIZ that consisted of potentially suitable habitat for each Covered Species. SDG&E multiplied this percentage by the total permanent (11.54 acres per year⁴), temporary (6.73 acres per year), and Wildfire Fuels Management Impacts (7 acres per year) impact acreage estimates to generate species-specific habitat impact estimates. To account for unanticipated impacts, SDG&E added a 15% buffer to the anticipated annual permanent and temporary impact estimates for each species. For each species, SDG&E calculated permanent impacts from New Construction by multiplying the annual impacts from Covered Activities by the proportion of impacts expected to occur from New Construction that SDG&E assumed would occur outside the PIZ (i.e., 16.6%) (HCP Amendment Section 4.1.3.2). SDG&E used this methodology for all Covered Species except eagles.

The Moreno Compressor Station, located in western Riverside County, encompasses approximately 180 acres of the Plan Area. The Moreno Compressor Station is a stand-alone parcel that is not contiguous with the remainder of the Plan Area. Approximately 14 acres of the property is developed, and the remaining portion of the property consists of sparse, disturbed vegetation and flat, bare terrain that has been disturbed by agricultural activity for more than 25 years. Given the defined nature of the property and the known habitat impacts from expansion of the Facility, it was not necessary to implement the Covered Species habitat modeling effort and associated impact methodology at this location. The potential presence of each Covered Species in this portion of the Plan Area was instead evaluated based on a desktop analysis of each Covered Species' habitat requirements, an evaluation of current vegetation community and land cover conditions, and historical data collected by SDG&E over the last several years. Habitat impacts of 5 acres were assumed for each Covered Species identified as having suitable habitat in this portion of the Plan Area. Actual habitat impacts in this portion of the Plan Area will be quantified and documented through individual review of each Covered Activity.

3.2.2.2 METHODOLOGY FOR EAGLE IMPACT ANALYSIS

The ECP (Appendix B of the HCP Amendment) assessed potential eagle impacts from potential nest disturbance, fatality from electrocution, collision with existing Facilities, and nest removal. The Service analyzed impacts to eagles based on an independent review

⁴ It was assumed that all historical impacts were permanent impacts.

and evaluation of that information and found the approach to be acceptable. The methodology detailed in Section 4 of the ECP is summarized below.

To estimate fatalities from electrocution and collision, SDG&E considered decades of historical eagle fatality data and extrapolated anticipated impacts through 2050. Given SDG&E's ongoing efforts to make its system more avian safe over time—by proactively retrofitting poles and rebuilding or building Facilities to avian-safe standards—this approach was conservative, as eagle fatalities are likely to decrease over time compared to historical rates.

Potential nest disturbance was estimated using the following approach. SDG&E reviewed nesting records for golden and bald eagles presented in various sources and overlaid a 1-mile polygon around each golden and bald eagle nest site record, which it described as Eagle Awareness Areas (EAAs).⁵ SDG&E reviewed EAAs to identify and evaluate in-use nests that were in proximity to Facilities. It used the combination of proximity and occupancy to estimate the number of nest disturbances that could occur through 2050. SDG&E estimated potential nest removals based on experience and a qualitative review of nesting data.

3.2.2.3 IMPACTS TO HABITAT

Temporary impacts to habitat consist of impacts on habitat that recover within 1 to 5 years and/or do not result in the installation or expansion of a new Facility footprint. Permanent impacts are typically the result of the loss of habitat because of constructing new facilities or expanding existing facilities in natural areas. Additionally, permanent impacts can result when restoration and enhancement of temporary impact sites fail to meet success criteria. Specific examples where permanent impacts could result from Covered Activities include permanent conversion of habitat for a substation expansion or permanent conversion of habitat to non-habitat for vegetation management. Covered Activities that require blading, scraping, or excavation could result in the replacement of pervious surfaces with impervious surfaces. Impacts to habitat may reduce prey base, increase the likelihood of exposure to injury or death, and potentially restrict access to resources for Covered Species survival, thereby increasing the possibility of individual loss.

⁵ EAAs are an existing SDG&E screening tool used by SDG&E for Covered Activities submitted to its Environmental Services group for internal environmental review and release.

AVOIDANCE AND MINIMIZATION OF IMPACTS TO HABITAT

A primary goal of the HCP Amendment is to avoid and minimize impacts to habitat to the extent feasible. Under the HCP Amendment, SDG&E would continue to conduct Covered Activities in an environmentally sensitive manner in accordance with 98 Operational Protocols (identified in Table 2-1 of this EA and detailed in Section 5.1 of the HCP Amendment), which were developed in consultation with the Wildlife Agencies. The Operational Protocols are primarily based upon impact avoidance and minimization and recognize that even minor adjustments during planning Covered Activities can yield major benefits to the environment.

Examples of general Operational Protocols SDG&E would implement to avoid and minimize impacts to habitat include:

- Conducting a PSR for Covered Activities occurring within or adjacent to habitat with potential to support Covered Species to document the environmental review of the potential impacts to Covered Species as a result of implementing a Covered Activity;
- Conducting biological monitoring as recommended in the PSR;
- Flagging habitat boundaries that must be avoided; and
- Designing and engineering Covered Activities to minimize new disturbance, erosion, and off-site degradation from accelerated sedimentation.

ESTIMATED IMPACTS TO HABITAT

Anticipated impacts to habitat that could occur within the Plan Area from O&M and New Construction are estimated in Table 3-4 (permanent impacts) and Table 3-5 (temporary impacts). As shown in Table 3-4, estimated permanent habitat impacts associated with O&M and New Construction total close to 400 acres through 2050, which represents 0.02% of the total Plan Area. Given the habitat types in the Plan Area, most of these impacts are expected to occur to upland vegetation communities, especially grassland, coastal scrub, and chaparral. Permanent impacts to habitats relative to the amount of total habitat within the Plan Area are very small for all vegetation communities: less than 1% for all habitats and 0.01% or less for 12 of the 18 habitat types.

**Table 3-4. Anticipated Permanent Habitat Impacts
Associated with Operation and Maintenance and New Construction (acres)**

Habitat Type	Total acres within Plan Area ¹	Total Impacts 1996–2018	Average Annual Impacts 1996–2018	Anticipated Impacts through 2050 ²	Unanticipated Impacts (15% buffer)	O&M Impacts through 2050	New Construction Impacts through 2050	Total O&M and New Construction Impacts through 2050 ^{3, 4}	% of Habitat in Plan Area Impacted by O&M and New Construction
Riparian and Wetlands	119,154	5.18	0.23	6.75	1.01	6.48	1.29	7.77	0.01
Alkali Playa ⁵	2,007	-	-	-	-	-	-	-	-
Beach/Coastal Dunes/Saltpan/Mudflats ⁵	1,319	-	-	-	-	-	-	-	-
Disturbed Wetlands	191	0.36	0.02	0.47	0.07	0.45	0.09	0.54	0.28
Marsh	5,946	0.39	0.02	0.51	0.08	0.49	0.1	0.59	0.01
Meadow/Seep	10,635	0.43	0.02	0.56	0.08	0.54	0.11	0.65	0.01
Non-Vegetated Flood Channel	2,718	0.01	0.00	0.01	0.00	0.01	0	0.01	<0.01
Open Water	26,418	0.02	0.00	0.02	0.00	0.03	0	0.03	<0.01
Riparian Forest/Woodland	58,972	1.36	0.06	1.78	0.27	1.7	0.34	2.04	<0.01
Riparian Scrub	10,875	2.18	0.09	2.85	0.43	2.73	0.54	3.27	0.03
Vernal Pools	72	0.43	0.02	0.55	0.08	0.53	0.11	0.64	0.89
Uplands	1,902,591	260.28	11.32	339.49	50.92	325.61	64.8	390.41	0.02
Badlands ⁵	46,075	-	-	-	-	-	-	-	-
Chaparral	822,591	53.70	2.33	70.05	10.51	67.18	13.37	80.55	0.01
Coastal Scrub	230,825	72.11	3.14	94.05	14.11	90.21	17.95	108.16	0.05
Desert Dunes ⁵	895	-	-	-	-	-	-	-	-
Desert Scrub	456,690	6.02	0.26	7.85	1.18	7.53	1.5	9.03	<0.01
Forest/Woodland	203,954	5.51	0.24	7.19	1.08	6.9	1.37	8.27	<0.01
Grasslands	130,350	121.15	5.27	158.03	23.70	151.56	30.17	181.73	0.14
Great Basin Scrub	11,212	1.78	0.08	2.32	0.35	2.23	0.44	2.67	0.02
Grand Total⁶	2,021,745	265.45	11.54	346.24	51.94	332.09	66.09	398.18	0.02

¹ Does not include non-sensitive cover types such as agriculture, disturbed, or developed areas.

² To be conservative, annual average multiplied by 30.

³ Sum of anticipated and potential unanticipated impacts.

⁴ The 5 acres of anticipated impacts to the agricultural and/or disturbed land cover types associated with the expansion of the Moreno Compressor Station are not included; SDG&E does not mitigate for either of these land cover types.

⁵ Impacts to these vegetation communities are not anticipated to occur.

⁶ Numbers may not total due to rounding.

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As shown in Table 3-5, anticipated temporary habitat impacts could total approximately 232 acres, but would be capped at 210 acres. These impacts are anticipated to occur in similar habitat types as permanent impacts. The acreage of temporary impacts for each habitat type represents a very small fraction of the total acreage within the plan area; less than 1% for all habitats, and 0.01% or less for 13 of the 18 habitat types.

Table 3-5. Anticipated Temporary Habitat Impacts Associated with Operation and Maintenance and New Construction (acres)

Habitat Type	Total acres within Plan Area ¹	Total Impacts 1996–2018	Average Annual Impacts 1996–2018	Anticipated Impacts through 2050 ²	Unanticipated Impacts from Future Covered Activities (15% of Anticipated Average)	Total Impacts through 2050 ³	% of Habitat in Plan Area Impacted by O&M and New Construction
Riparian and Wetlands	119,154	4.08	0.18	5.33	0.80	6.13	0.01
Alkali Playa ⁴	2,007	-	-	-	-	-	-
Beach/Coastal Dunes/Saltpan/Mudflats ⁴	1,319	-	-	-	-	-	-
Disturbed Wetlands	191	0.33	0.01	0.42	0.06	0.49	0.26
Marsh	5,946	0.35	0.02	0.46	0.07	0.53	0.01
Meadow/Seep	10,635	0.43	0.02	0.56	0.08	0.64	0.01
Non-Vegetated Flood Channel	2,718	0.01	0.00	0.01	0.00	0.01	<0.01
Open Water	26,418	0.02	0.00	0.02	0.00	0.03	<0.01
Riparian Forest/Woodland	58,972	1.08	0.05	1.41	0.21	1.63	<0.01
Riparian Scrub	10,875	1.86	0.08	2.43	0.36	2.80	0.03
Vernal Pools	72	0.00	0.00	0.01	0.00	0.01	0.01
Uplands	1,902,591	150.79	6.56	196.68	29.50	226.18	0.01
Badlands ⁴	46,075	-	-	-	-	-	-
Chaparral	822,591	22.03	0.96	28.73	4.31	33.04	<0.01
Coastal Scrub	230,825	37.77	1.64	49.26	7.39	56.65	0.02
Desert Dunes ⁴	895	-	-	-	-	-	-
Desert Scrub	456,690	2.30	0.10	3.01	0.45	3.46	<0.01
Forest/Woodland	203,954	4.52	0.20	5.89	0.88	6.78	<0.01
Grasslands	130,350	82.64	3.59	107.79	16.17	123.96	0.10
Great Basin Scrub	11,212	1.53	0.07	2.00	0.30	2.30	0.02
Grand Total⁵	2,021,745	154.87	6.73	202.01	30.30	232.31⁶	0.01

¹ Does not include non-sensitive cover types such as agriculture, disturbed, or developed areas.

² To be conservative, annual average multiplied by 30.

³ Sum of anticipated and potential unanticipated impacts.

⁴ Impacts to these vegetation communities are not anticipated to occur.

⁵ Numbers may not total due to rounding.

⁶ As noted above, SDG&E's request for incidental take for temporary impacts would be reduced to 210 acres, which is a more conservative approach that is in line with historical averages (i.e., approximately 7 acres/year x 30 years).

Most of the 210 acres of anticipated impacts to habitat from Wildfire Fuels Management are expected to occur within upland vegetation communities (primarily chaparral). Even assuming all impacts were to occur within upland habitats, the percentage of habitat impacted would be very small relative to the total acreage of upland habitats in the Plan Area. For example, impacts to 210 acres of chaparral would amount to less than 0.03% of the total acreage of chaparral within the Plan Area impacted through 2050. Some minor impacts may occur within riparian or wetland habitat. But these habitat areas are outside High Fire Threat Districts and Wildfire Fuels Management would be limited to specific instances where vegetation was causing a high ignition risk. Impacts to these vegetation communities within the Plan Area are expected to be negligible.

HABITAT MITIGATION

SDG&E would mitigate unavoidable impacts to habitat as detailed in Section 5.5 of the HCP Amendment. SDG&E maintains an accounting of all Mitigation Credits and these mitigation bank accounts are debited to mitigate for actual impacts from completed Covered Activities. When additional Mitigation Credits are needed for future permanent impacts, SDG&E can either obtain Mitigation Credits from the open market (i.e., purchase off the shelf credits from mitigation/conservation banks) or they can pursue purchasing lands and work in collaboration with the Wildlife Agencies to create Mitigation Credits that can be used to satisfy their ongoing mitigation obligations.

SDG&E would mitigate permanent upland impacts from New Construction and O&M at a 2:1 ratio within Preserves or Proposed Preserves (defined in Section 5.4 of the HCP Amendment) and a 1:1 ratio for New Construction outside of a Preserve or Proposed Preserve (Table 5.3a of the HCP Amendment). Wetland and riparian habitats would be mitigated at a 2:1 to 4:1 ratio regardless of where they are located inside or outside of a Preserve or Proposed Preserve (Table 5.3b of the HCP Amendment).

To mitigate for permanent impacts, SDG&E would either (i) withdraw Mitigation Credits or (ii) submit to the Service an appropriate alternative mitigation proposal as detailed in Section 5.5.3 of the HCP Amendment. For a permanent impact, SDG&E would debit the specific amount (i.e., acreage from) its 400-acre permanent impact cap and debit

appropriate Mitigation Credits from its bank. No further drawdown of Mitigation Credits, restoration, or enhancement would be required if the same acreage is again impacted by a future Covered Activity.

SDG&E may restore temporary or mitigate permanent impacts from New Construction and O&M through the R/E Program detailed in Section 5.2 of the HCP Amendment. When temporarily impacted lands are enrolled in the R/E Program, SDG&E would debit the acreage amount from the 210 acres of authorized temporary impacts. If the restoration effort fails, SDG&E would then be required to consider the unrestored impacts as permanent impacts, which would then require a debit from the 400-acre permanent impact cap and their mitigation bank account. SDG&E would then credit back the acreage amount previously debited from the temporary impact cap.

As detailed in Section 5.5.4 of the HCP Amendment, SDG&E would mitigate impacts to vernal pools through onsite restoration/enhancement of vernal pools or at areas pre-approved by the Service. Mitigation ratios range from 1:1 to 3:1, depending on the species impacted (Table 5.5 of the HCP Amendment). SDG&E would attempt to restore temporary impacts to vernal pools. Unsuccessful restoration would be mitigated as a permanent impact at a 3:1 ratio to account for temporal loss of habitat value. SDG&E also may develop and use Mitigation Credits, as approved by the Service, through advanced creation, restoration, and enhancement proposals. Restoration/enhancement of vernal pools would be of high quality (e.g., Carmel Mesa, Del Mar Mesa, and Otay Mesa) and would support Covered Species. Pre-approved vernal pool mitigation areas must be managed and monitored pursuant to a Management Plan approved by the Service.

Wildfire Fuels Management will focus on removing nonnative species, which can counteract the potential spread of invasive species along utility corridors and benefit the overall ecological value of the surrounding vegetation communities. If SDG&E determines Wildfire Fuels Management is no longer needed at a particular Treatment Area, SDG&E can restore or allow the area to return to its pre-treatment conditions. Once the land is returned to that pre-treatment state, SDG&E may credit a portion of the Mitigation Credits that were debited for those areas based on the percent native vegetation restored, as described in Section 5.2 of the HCP Amendment.

In addition, within the Plan Area, SDG&E uses and maintains a system of roads to access SDG&E Facilities. There is the potential that, in the Plan Area, certain SDG&E access roads could potentially be realigned or decommissioned to improve local biological resources without sacrificing safe and reliable access to SDG&E Facilities. Any SDG&E

access road that SDG&E determines is unnecessary for safe and reliable access to its Facilities would be decommissioned and restored by SDG&E or a third party.

HABITAT IMPACT SUMMARY

Overall permanent impacts to habitat are small compared to the total habitat in the Plan Area (comprising 0.02%). Moreover, SDG&E would avoid and minimize impacts to habitat to the greatest extent feasible through continued implementation of the PSR process and applicable Operational Protocols (identified in Table 2-1 of this EA and detailed in Section 5.1 of the HCP Amendment) and adherence to the impact limits in the HCP Amendment and reflected in the ITP. SDG&E would mitigate impacts to habitat that cannot be avoided at levels commensurate with or greater than the impacted habitat, thereby offsetting or improving overall conditions in the Plan Area.

Further, the spread of invasive plants, as well as other flammable native vegetation, can increase fuel loads, creating dangerous fire conditions that can threaten powerlines and Facilities. Proactively managing fire fuel loads—including through removal of invasive weeds—can prevent the spread of invasive species, provide habitat for pollinators, and act as an effective firebreak for the control and suppression of wildfire. Accordingly, the long-term effect of SDG&E's Wildfire Fuels Management is anticipated to be a net benefit due to the reduction in nonnative weeds and fire risk.

In light of the implementation of the Operational Protocols, R/E Program, and mitigation requirements of the HCP Amendment, the Proposed Action would not result in substantial loss or degradation to habitat within the Plan Area.

3.2.2.4 IMPACTS TO COVERED SPECIES

As previously discussed, SDG&E has successfully implemented the conservation strategy detailed in the Subregional Plan since 1995. Nonetheless, these activities could result in direct impacts on individuals of Covered Species, which may be harmed or killed by habitat loss or by construction vehicles and equipment during ground disturbance, vegetation clearing, or off-road travel.

COVERED SPECIES AVOIDANCE AND IMPACT MINIMIZATION

The conservation strategy detailed in the HCP Amendment would continue and improve upon the approach that SDG&E has implemented since 1995 under the Subregional Plan. The HCP Amendment would avoid impacts on Covered Species by following SDG&E's

environmental screening practices (i.e., pre-activity survey) described in Section 6.3.2 of the HCP Amendment. For Covered Activities, biologists would conduct project-specific screening to determine which Operational Protocols apply and must be implemented.

As detailed in Chapter 5 of the HCP Amendment, SDG&E would first attempt to avoid any impacts to Covered Species and their habitats altogether. Next, SDG&E would minimize unavoidable impacts to Covered Species and habitats to the extent feasible (including habitat restoration and enhancement) and appropriately mitigate unavoidable impacts. SDG&E would minimize impacts to the greatest extent feasible by identifying and documenting sensitive resources through its PSR process (Section 6.3.2 of the HCP Amendment) and implementing applicable Operational Protocols.

OPERATIONAL PROTOCOLS THAT BENEFIT ALL COVERED SPECIES

Operational Protocols are listed in Table 2-1 of this EA and detailed in Section 5.1 of the HCP Amendment. The following Operational Protocols would avoid and minimize direct and indirect impacts on all Covered Species:

- Operational Protocols 3, 5, 6, 8, 35, and 36 minimize direct harm to all wildlife;
- Operational Protocols 1, 2, 15, 16, 17, 24, 34, 42, and 53 minimize the disturbance footprint and duration of Covered Activities;
- Operational Protocol 9 prohibits littering on-site;
- Operational Protocols 12 and 13 require training construction crews on species avoidance and minimization measures;
- Operational Protocols 7 and 10 restrict vehicles and equipment parking to designated areas;
- Operational Protocol 31 limits tree trimming;
- Operational Protocols 39 through 48 limit impacts from access road maintenance and development of new access roads; and
- Operational Protocol 53 reduces impacts from off-road travel.

ESTIMATED IMPACTS TO COVERED SPECIES AND THEIR HABITATS

Impacts to habitat may reduce prey base, increase the likelihood of exposure to injury or death, and potentially restrict access to resources for Covered Species survival, thereby increasing the possibility of individual loss. Indirect effects could result from damage to

habitat, including loss of nesting trees, host plants, cover plants, and other vegetation; soil compaction that adversely affects the life cycle of some covered invertebrates; and pollution of aquatic habitats from fuels, hazardous materials, or sedimentation from eroded soils disturbed by construction. Construction could also spread invasive plants that could degrade habitat by outcompeting host plants and other native plants that provide food sources, cover, or other habitat values for covered wildlife. Table 3-6 provides anticipated potential permanent and temporary impacts to Covered Species habitat in the Plan Area from New Construction and O&M, as well as impacts from Wildfire Fuels Management. Appendix A of the HCP Amendment provides a detailed analysis of potential impacts to Covered Species.

SPECIES-SPECIFIC HABITAT MITIGATION

Impacts to occupied habitat of Covered Species with specific mitigation requirements would be mitigated as shown in Table 5.4 of the HCP Amendment. It is recognized that Covered Activities may possibly impact habitat, only a portion of which is confirmed as occupied by a Covered Species included in Table 5.4. If project timing does not allow for surveys, it will be assumed that all habitat to be impacted is occupied. When surveys are conducted to determine occupancy status, those surveys will also determine the extent of habitat occupied by a species listed in Table 5.4 and mitigation will be as follows:

- Permanent impacts to habitat unoccupied by any Covered Species listed in Table 5.4 will be mitigated as required by Tables 5.3a and 5.3b.
- Permanent impacts to habitat occupied by any Covered Species listed in Table 5.4 will be mitigated via in-kind mitigation at the appropriate ratio provided in Table 5.4.

IMPACTS TO COVERED PLANTS

Sixteen covered plants, 11 that are designated as narrow endemic species and 5 that are designated as vernal pool species, may be impacted by Covered Activities. Covered Activities could result in direct loss of individual plants, disruption of the seedbank, reduced habitat quality due to soil compaction or introduction of invasive plants, crushing, trampling, becoming covered in fugitive dust (and corresponding reduction in photosynthetic capacity), and altered fire regime. Runoff, sedimentation, and erosion can also adversely impact plant populations by damaging individuals or by altering site conditions sufficiently to favor other species (native and exotic nonnatives) that would competitively displace covered plants.

Table 3-6. Anticipated Permanent, Temporary, and Wildfire Fuels Management Modeled Species Habitat Impacts in the Plan Area (acres)

Common Name	Modeled Habitat in Plan Area	Modeled Habitat in PIZ	Percentage of PIZ Supporting Modeled Habitat ¹	Permanent Impacts					Temporary Impact			Wildfire Fuels Management			Impacts through 2050 ^{7, 5}	
				Annual Impacts ^{2,3}	Total O&M and New Construction Impacts through 2050 ^{3,5}	O&M Impacts through 2050	New Construction Impacts through 2050	Percentage of Modeled Habitat Impacted through 2050 ⁶	Annual Impacts ^{2,3}	Impacts through 2050 ^{3,5}	Percentage of Modeled Habitat Impacted through 2050 ^{3,6}	Annual Impacts ⁴	Impacts through 2050 ^{3,5}	Percentage of Modeled Habitat Impacted through 2050 ⁶	Total ³	Percentage of Modeled Habitat Impacted through 2050 ^{3,6}
Plants (16)																
San Diego thorn-mint	43,598.13	4,959.73	10.19%	1.35	40.58	33.84	6.74	0.09%	0.79	23.66	0.05%	0.71	21.40	0.05%	85.64	0.20%
San Diego ambrosia	9,687.10	676.83	1.39%	0.18	5.54	4.62	0.92	0.06%	0.11	3.23	0.03%	0.10	2.92	0.03%	11.69	0.12%
Del Mar manzanita	4,435.99	858.52	1.76%	0.23	7.02	5.85	1.17	0.16%	0.14	4.10	0.09%	0.12	3.70	0.08%	14.82	0.33%
Encinitas baccharis	46,669.96	1,599.70	3.29%	0.44	13.09	10.92	2.17	0.03%	0.25	7.63	0.02%	0.23	6.90	0.01%	27.62	0.06%
Thread-leaved brodiaea	8,424.05	1,090.49	2.24%	0.30	8.92	7.44	1.48	0.11%	0.17	5.20	0.06%	0.16	4.71	0.06%	18.83	0.22%
Salt marsh bird's-beak	659.38	29.13	0.06%	0.01	0.24	0.2	0.04	0.04%	<0.01	0.14	0.02%	-	-	-	0.38	0.06%
Orcutt's spineflower	1,847.97	320.70	0.66%	0.09	2.62	2.19	0.43	0.14%	0.05	1.53	0.08%	0.05	1.38	0.07%	5.53	0.30%
Otay tarplant	2,074.93	369.66	0.76%	0.10	3.02	2.52	0.5	0.15%	0.06	1.76	0.08%	0.05	1.60	0.08%	6.38	0.31%
Short-leaved dudleya	2,007.85	346.59	0.71%	0.09	2.84	2.37	0.47	0.14%	0.06	1.65	0.08%	0.05	1.50	0.07%	5.99	0.30%
San Diego button-celery	6,411.79	603.68	1.24%	0.16	4.94	4.12	0.82	0.08%	0.10	2.88	0.04%	-	-	-	7.82	0.12%
Willow monardella	14,891.11	1,464.11	3.01%	0.40	11.98	9.99	1.99	0.08%	0.23	6.99	0.05%	0.21	6.32	0.04%	25.29	0.17%
Spreading navarretia	6,411.79	603.68	1.24%	0.16	4.94	4.12	0.82	0.08%	0.10	2.88	0.04%	-	-	-	7.82	0.12%
Dehesa beargrass	2,295.68	123.82	0.25%	0.03	1.01	0.84	0.17	0.04%	0.02	0.59	0.03%	0.02	0.53	0.02%	2.13	0.09%
California Orcutt grass	4,559.70	831.83	1.71%	0.23	6.81	5.68	1.13	0.15%	0.13	3.97	0.09%	-	-	-	10.78	0.24%
San Diego mesa mint	2,536.16	341.16	0.70%	0.09	2.79	2.33	0.46	0.11%	0.05	1.63	0.06%	-	-	-	4.42	0.17%
Otay Mesa mint	691.32	115.89	0.24%	0.03	0.95	0.79	0.16	0.14%	0.02	0.55	0.08%	-	-	-	1.5	0.22%
Invertebrates (4)																
San Diego fairy shrimp	7,153.19	785.41	1.61%	0.21	6.43	5.36	1.07	0.09%	0.12	3.75	0.05%	-	-	-	10.18	0.14%
Riverside fairy shrimp	8,075.11	1,153.42	2.37%	0.31	9.44	7.87	1.57	0.12%	0.18	5.50	0.07%	-	-	-	14.94	0.19%
Laguna Mountains Skipper	1,172.46	13.50	0.03%	<0.01	0.11	0.09	0.02	0.01%	<0.01	0.06	0.01%	<0.01	0.06	0.01%	0.23	0.02%
Hermes copper butterfly	503,764.71	18,195.00	37.39%	4.91	148.85	124.14	24.71	0.03%	2.89	86.81	0.02%	2.61	78.52	0.02%	314.18	0.06%
Amphibians (3)																
Arroyo toad - breeding and nonbreeding riparian habitat ⁸	26,702.02	1,176.17	2.42%	0.32	9.62	8.02	1.6	0.04%	0.19	5.61	0.02%	0.17	5.08	0.02%	20.31	0.08%
Arroyo toad - nonbreeding upland habitat ⁸	1,323,401.31	47,674.56	97.69%	13.00	390.03	325.29	64.74	0.03%	7.58	227.46	0.02%	6.86	205.73	0.02%	823.22	0.01%
California red-legged frog	61,071.29	2,620.41	5.38%	0.71	21.44	17.88	3.56	0.04%	0.42	12.50	0.02%	0.38	11.31	0.02%	45.25	0.07%
Western spadefoot – breeding habitat	39,348.14	2,159.64	4.44%	0.59	17.67	14.74	2.93	0.04%	0.34	10.30	0.03%	-	-	-	27.97	0.06%
Western spadefoot – upland habitat ⁹	1,183,765.51	37,080.81	76.20%	10.11	303.36	253.00	50.36	0.03%	5.90	176.92	0.01%	5.33	160.01	0.01%	640.29	0.05%

Common Name	Modeled Habitat in Plan Area	Modeled Habitat in PIZ	Percentage of PIZ Supporting Modeled Habitat ¹	Permanent Impacts					Temporary Impact			Wildfire Fuels Management			Impacts through 2050 ^{7, 5}	
				Annual Impacts ^{2,3}	Total O&M and New Construction Impacts through 2050 ^{3,5}	O&M Impacts through 2050	New Construction Impacts through 2050	Percentage of Modeled Habitat Impacted through 2050 ⁶	Annual Impacts ^{2,3}	Impacts through 2050 ^{3,5}	Percentage of Modeled Habitat Impacted through 2050 ^{3,6}	Annual Impacts ⁴	Impacts through 2050 ^{3,5}	Percentage of Modeled Habitat Impacted through 2050 ⁶	Total ³	Percentage of Modeled Habitat Impacted through 2050 ^{3,6}
Reptiles (2)																
Southwestern pond turtle	48,245.92	2,366.10	4.86%	0.65	19.36	16.15	3.21	0.04%	0.38	11.29	0.02%	0.34	10.21	0.02%	40.86	0.08%
Coast horned lizard	933,391.29	26,019.18	53.47%	7.10	212.86	177.53	35.33	0.02%	4.14	124.14	0.01%	3.74	112.28	0.01%	449.28	0.05%
Birds (13)																
Tricolored blackbird	21,116.41	692.87	1.42%	0.16	5.67	4.73	0.94	0.03%	0.11	3.31	0.02%	-	-	-	8.98	0.04%
Burrowing owl	218,361.64	6,519.36	13.40%	1.78	53.34	44.49	8.85	0.02%	1.04	31.10	0.01%	0.93	28.13	0.01%	117.57 ¹²	0.05%
Coastal cactus wren	133,326.07	10,895.07	22.39%	2.97	89.13	74.33	14.8	0.07%	1.73	51.98	0.04%	1.57	47.01	0.04%	188.12	0.14%
Western snowy plover	1,685.26	178.91	0.37%	-	-	-	-	-	0.03	0.85	0.05%	-	-	-	0.85	0.05%
Western yellow-billed cuckoo	13,110.66	963.16	1.98%	0.26	7.88	6.57	1.31	0.06%	0.15	4.60	0.04%	0.14	4.16	0.03%	16.64	0.13%
Southwestern willow flycatcher	46,030.28	2,228.06	4.58%	0.61	18.23	15.2	3.03	0.04%	0.35	10.63	0.02%	0.32	9.61	0.02%	38.47	0.08%
Belding's savannah sparrow	1,292.30	108.28	0.22%	0.03	0.89	0.74	0.15	0.07%	0.02	0.52	0.04%	-	-	-	1.41	0.11%
Coastal California gnatcatcher	95,162.97	7,365.30	15.13%	2.01	60.26	50.26	10	0.06%	1.17	35.14	0.04%	1.06	31.78	0.03%	127.18	0.13%
Light-footed Ridgway's rail	3,661.38	307.80	0.63%	0.08	2.52	2.1	0.42	0.07%	0.05	1.47	0.04%	-	-	-	3.99	0.11%
California least tern	519.67	85.92	0.18%	-	-	-	-	-	0.01	0.41	0.08%	-	-	-	0.41	0.08%
Least Bell's vireo	36,832.29	1,798.65	3.70%	0.49	14.71	12.27	2.44	0.04%	0.29	8.58	0.02%	0.26	7.76	0.02%	31.05	0.08%
Mammals (2)																
Stephens' kangaroo rat	52,039.43	574.04	1.18%	0.16	4.70	3.92	0.78	0.01%	0.09	2.74	0.01%	0.08	2.48	0.01%	14.92 ¹²	0.02%
Peninsular bighorn sheep ¹¹	429,424	923.04	1.90%	0.25	7.55	6.30	1.25	<0.01%	0.15	4.40	<0.01%	-	-	-	11.95	<0.01%
Pacific pocket mouse	2,557.00	183.00	0.38%	0.05	1.50	1.25	0.25	0.06%	0.03	0.87	0.03%	-	-	-	2.37	0.09%

¹ The portion of the PIZ with undeveloped habitat totals 48,665 acres. The percentage represents modeled habitat within the PIZ divided by 48,665 acres. Note that anticipated impacts to modeled habitat have been calculated to provide an approximation of the potential impacts on Modeled Habitat for each Covered Species. Actual impacts on Covered Species habitat would be assessed, avoided, and minimized through the existing Pre-activity Survey Report [PSR] process.

² The sum of anticipated and potential unanticipated impacts in Appendix A of the HCP (Covered Species Analysis), Attachments B and C.

³ Numbers rounded after calculations completed

⁴ Species with no impacts within the table would not be impacted by Wildfire Fuels Management because Wildfire Fuels Management would not have direct habitat impacts on vernal pool, marsh, or beach species. Wildfire Fuels Management would also not be conducted within Pacific pocket mouse habitat.

⁵ To be conservative, annual average multiplied by 30 years

⁶ Total impacts divided by all modeled habitat within the Plan Area.

⁷ Note that anticipated impacts to modeled habitat have been calculated to provide an approximation of the potential impacts on modeled habitat for each Covered Species. Actual impacts on Covered Species habitat would be assessed, avoided, and minimized through the existing PSR process.

⁸ The County of San Diego Species Habitat Model for arroyo toad consist of riparian breeding habitat along the banks of a stream and non-breeding riparian habitat (i.e., riparian habitat outside the banks of a stream channel would not be considered breeding habitat). In order to estimate nonbreeding upland habitat for arroyo toad, all grassland, agriculture, coastal sage scrub, and chaparral within the Plan Area and PIZ was considered suitable nonbreeding upland habitat.

⁹ The overall extent of suitable upland habitat within the Plan Area for spadefoot is overestimated as it includes all grassland, coastal sage scrub, and chaparral within the Plan Area and PIZ regardless of if it is adjacent to breeding habitat.

¹⁰ Impacts to bald and golden eagles are discussed separately in the Eagle Conservation Plan in Appendix B of the HCP Amendment.

¹¹ Impacts for Peninsular bighorn sheep are based on essential habitat as described in Appendix C of the HCP Amendment.

¹² Five acres were added to total to account for permanent impacts at Moreno Compressor Station.

Covered Plant Avoidance and Impact Minimization

In addition to the Operational Protocols discussed above, the HCP Amendment includes Narrow Endemic and Vernal Pool and Road Rut Protocols that would be implemented whenever Covered Activities would be conducted in or near covered plant populations and their habitats. First, potential impacts to narrow endemic plants would be avoided to the greatest extent practicable. When work occurs within a known or potential area of occurrence of a narrow endemic plant, focused surveys would occur within the appropriate blooming season. If project timing does not allow for surveys, it would be assumed that all habitat to be impacted is occupied. If a narrow endemic is observed or assumed to be within the work area, it would be avoided to the greatest extent practicable. If avoidance is not feasible, SDG&E would confer with the Service to determine the best approach for minimization of impacts, such as restoration, enhancement of suitable habitat, and salvage/relocation of species to a suitable location.

Impacts to vernal pools and/or their watersheds (vernal pool habitat) would be avoided through project design considerations, to the maximum extent practicable. To avoid vernal pool covered plants, grading adjacent to vernal pools would be timed to avoid wet weather to minimize potential impacts (e.g., siltation) to the vernal pools unless the area to be graded is at an elevation below the pools. In addition, SDG&E would use biological monitors and protective fencing if necessary; maintain avoidance buffers when working adjacent to vernal pools; fuel, stage, and maintain construction equipment at least 100 feet from the nearest vernal pools where feasible; and use protective measures to prevent spills where 100-foot buffers from the nearest vernal pools are not feasible.

Both the Narrow Endemic Plant and Vernal Pool and Road Rut Protocols require a Minor Amendment (consistent with Section 6.5.1.2 of the HCP Amendment) for New Construction that would impact known or potentially occupied habitat for narrow endemic or vernal pool covered plants.

Estimated Impacts to Covered Plants and Their Habitats

Appendix A of the HCP Amendment summarizes the known occurrences and impact acreage of covered plant habitat within the PIZ. For each covered plant, the total percentage of habitat that may be impacted (permanently, temporarily, or by Wildfire Fuels Management) does not exceed 0.31% of the overall modeled habitat in the Plan Area (Table 3-6). Covered Activities are largely focused on O&M of existing Facilities, which typically have small footprints spread throughout the PIZ. Accordingly, it is unlikely that Covered Activities would impact or destroy an entire metapopulation or population of a covered plant occurrence. Additional direct impacts of covered plant occurrences could

occur from New Construction outside the PIZ, but these potential impacts are also expected to be minimal as SDG&E does not anticipate any major New Construction. While O&M and New Construction may directly impact covered plants, they are not expected to be impacted by Wildfire Fuels Management, which would focus on removal of nonnative plants and more common native plants. With implementation of the Narrow Endemic and Vernal Pool and Road Rut Protocols, impacts to individual covered plants and their habitats are expected to be avoided and minimized to the maximum extent practicable.

Covered Plant Mitigation

Permanent impacts to covered narrow endemic plant upland habitat would be mitigated in-kind at a 2:1 ratio for impacts inside a Preserve or Proposed Preserve and at a 1:1 ratio for impacts outside of a Preserve or Proposed Preserve (see Table 5.4 of the HCP Amendment). Permanent impacts to covered narrow endemic plant wetland habitat would be mitigated in-kind at a 2:1 to 4:1 ratio (see Table 5.4 of the HCP Amendment). Temporary impacts to covered narrow endemic plant habitat may be mitigated through the R/E Program per Section 5.2 of the HCP Amendment or treated as permanent and mitigated as previously described.

For covered vernal pool plant species, permanent impacts to occupied habitat would be mitigated at a 3:1 ratio (see Table 5.5 of the HCP Amendment). This mitigation may occur on-site or within a Service-approved area. Unoccupied habitat would be mitigated at a 1:1 to 2:1 ratio. Temporary impacts to vernal pools may be restored as required by the Vernal Pool and Road Rut Protocols or treated as a permanent impact. Topsoil (inoculum) and/or vernal pool plant seed would be collected prior to permanent or temporary impacts so that it may be used for mitigation or restoration. If restoration of pools with covered vernal pool plant species is unsuccessful or if seed or vernal pool inoculum collection is not possible, impacts would be mitigated at a 3:1 ratio.

Covered Plant Impact Summary

Overall, impacts to covered plants from Covered Activities are expected to be small, mostly temporary, and distributed over a large area through 2050. SDG&E would avoid and minimize impacts to covered plants and their habitat to the greatest extent feasible, through continued implementation of its environmental review practices; application of applicable Operational Protocols, including Narrow Endemic and Vernal Pool and Road Rut Protocols identified in Table 2-1 of this EA and detailed in Section 5.1 of the HCP Amendment; adherence to the impact limits in the HCP Amendment; and mitigation for

unavoidable impacts. Therefore, the Proposed Action is not expected to result in substantial direct mortality or substantial loss or degradation of habitat for covered plants.

IMPACTS TO COVERED INVERTEBRATES

San Diego and Riverside fairy shrimp, Laguna Mountains skipper, and Hermes copper butterfly are covered invertebrates that may be impacted by Covered Activities. Covered Activities could result in direct impacts to covered fairy shrimp species from grading and vehicular traffic driving through occupied pools and crushing cysts. Other impacts could include changes to pool hydrology that do not permit sufficient inundation, spread of nonnative plant species that rapidly absorb soil moisture, and spread of non-listed fairy shrimp species that may hybridize with listed fairy shrimp species. Covered Activities could also result in direct impacts to Laguna Mountains skipper and Hermes copper butterfly or their host plants and nectar sources from grading, vehicles, equipment, and foot traffic that may crush, kill, or bury invertebrates. Furthermore, soil compaction, disturbed soil, and/or fugitive dust may be detrimental to host plants and nectar sources as well as degrade habitat quality for these butterfly species.

Covered Invertebrates Avoidance and Impact Minimization

In addition to the Operational Protocols discussed above, the HCP Amendment includes Vernal Pool and Road Rut Protocols for San Diego and Riverside fairy shrimp, as discussed above for covered vernal pool plants, and Species-Specific Protocols for Laguna Mountains skipper and Hermes copper butterfly, that will be implemented whenever Covered Activities would be conducted in or near covered invertebrate populations and their habitats. When work occurs within a known or potential area of occurrence of Laguna Mountains skipper and Hermes copper butterfly, focused surveys would occur within the appropriate adult flight season. If project timing does not allow for surveys, it would be assumed that all habitat to be impacted is occupied. If Laguna Mountains skipper or Hermes copper butterfly are observed or assumed to be within the work area, they would be avoided to the greatest extent practicable. If avoidance is not feasible, SDG&E would confer with the Service to determine the best approach for minimization of impacts.

The Vernal Pool and Road Rut Protocols and Species-Specific Protocols require a Minor Amendment (consistent with Section 6.5.1.2 of the HCP Amendment) for New Construction that impacts known or potentially occupied habitat for covered invertebrates.

Estimated Impacts to Covered Invertebrates and Their Habitats

Appendix A of the HCP Amendment summarizes the known occurrences and impact acreage for covered invertebrate habitat within the PIZ. For each covered invertebrate the total percentage of habitat that may be impacted (permanently, temporarily, and/or by Wildfire Fuels Management) does not exceed 0.19% of the overall modeled habitat in the Plan Area (Table 3-6). Covered Activities are largely focused on O&M of existing Facilities, which typically have small footprints spread throughout the PIZ. Accordingly, it is unlikely that Covered Activities would impact or destroy an entire metapopulation or population of a covered invertebrate occurrence. Additional direct impacts of covered invertebrate occurrences could occur from New Construction outside the PIZ, but these potential impacts are also expected to be minimal as SDG&E does not anticipate any major New Construction. Covered fairy shrimp species are not expected to be impacted by Wildfire Fuels Management, which would focus on removal of nonnative plants and more common native plants. With implementation of the Vernal Pool and Road Rut and Species-Specific Protocols, impacts to individual covered invertebrates and their habitats are expected to be avoided and minimized to the maximum extent practicable.

Covered Invertebrate Mitigation

Permanent impacts to vernal pools occupied by covered fairy shrimp species would be mitigated at a 3:1 ratio if also occupied by covered plant species; a 2:1 ratio if also occupied by vernal pool indicator plant species, and a 1:1 ratio if no vernal pool plant Covered Species or indicator species were present (e.g., occupied road rut) (see Table 5.5 of the HCP Amendment). Mitigation for permanent impacts may occur on-site or within a Service-approved area. Temporary impacts would be restored as required by the Vernal Pool and Road Rut Protocols. Topsoil (inoculum) and/or vernal pool plant seed would be collected prior to any impacts so that it may be used for mitigation or restoration. If restoration is unsuccessful or if seed or vernal pool inoculum collection is not possible, impacts would be mitigated at a 3:1 ratio.

Permanent impacts to covered butterfly habitat would be mitigated in-kind at a 2:1 ratio if inside a Preserve or Proposed Preserve or 1:1 ratio if outside a Preserve or Proposed Preserve (see Table 5.4 of the HCP Amendment). Temporary impacts to covered butterfly habitat may be restored through the R/E Program per Section 5.2 of the HCP Amendment or treated as permanent and mitigated as previously described.

Covered Invertebrates Impact Summary

Overall, impacts to covered invertebrates from Covered Activities are expected to be small, mostly temporary, and distributed over a large area over the through 2050. SDG&E would avoid and minimize impacts to covered invertebrates and their habitat to the

greatest extent feasible, through continued implementation of its environmental review practices; application of applicable Operational Protocols, including Vernal Pool and Road-Rut Protocols, and Species-Specific Protocols identified in Table 2-1 of this EA and detailed in Section 5.1 of the HCP Amendment; adherence to impact limits in the HCP Amendment; and mitigation for unavoidable impacts. Therefore, the Proposed Action is not expected to result in substantial direct mortality or substantial loss or degradation of habitat for covered invertebrates.

IMPACTS TO COVERED AMPHIBIANS AND REPTILES

Three covered amphibians (arroyo toad, California red-legged frog, and western spadefoot) and two covered reptiles (southwestern pond turtle and coast horned lizard), may be impacted by Covered Activities. Covered Activities could cause direct mortality or injury of covered amphibians during ground-disturbing activities in or near aquatic habitats, as well as vehicle and equipment travel across or near aquatic habitats. Covered Activities are more likely to affect covered amphibians when the species are more active during the wet season. Individual covered amphibians could be crushed or buried by vehicles or equipment during travel or while performing earthwork in upland habitat, particularly when very near aquatic breeding habitat. If Covered Activities cannot avoid aquatic breeding habitat, tadpoles and eggs could also be directly impacted by equipment. Indirect impacts could result from upland disturbances that affect drainage patterns or increase sedimentation, stream banks collapsing from construction equipment or other activities, or the discharge of pollutants into the soil or aquatic habitats. Covered Activities could also spread invasive plants that could degrade wetland and aquatic habitat by outcompeting with native plants. Similarly, vehicles and equipment could crush reptile eggs, juveniles, and adults, either while they are above ground during their active or breeding season or below ground during their inactive period.

Covered Amphibian and Reptile Avoidance and Impact Minimization

In addition to the Operational Protocols discussed above, the HCP Amendment includes Vernal Pool and Road Rut Protocols for western spadefoot, as discussed above for covered vernal pool plants, and Species-Specific Protocols for arroyo toad, California red-legged frog, western spadefoot, and southwestern pond turtle (Section 5.1.13 of the HCP Amendment) that will be implemented whenever Covered Activities would be conducted in or near populations of these species and their habitats. First, potential impacts would be avoided to the greatest extent practicable. SDG&E would avoid and minimize impacts to western spadefoot through implementation of the Vernal Pool and Road Rut Protocols (Section 5.1.11 of the HCP Amendment). As noted above, these

require SDG&E to grade only when vernal pools are dry; use biological monitoring and protective fencing if necessary; maintain avoidance buffers when working adjacent to vernal pools; and fuel, stage, and maintain construction equipment at least 100 feet from the nearest vernal pools, where feasible, and use protective measures to prevent spills where it is not.

Species-Specific Protocols for arroyo toad, California red-legged frog, western spadefoot and southwestern pond turtle include, among other things, requiring SDG&E to undertake biological monitoring; coordinate with the Service to determine the best approach to avoid and minimize impacts; relocate individual species to avoid harm; minimize impacts to habitat; conduct Covered Activities within suitable habitat during times that minimize potential for take; install exclusionary fencing; avoid night-time construction; cover soil stockpiles; and cover holes and trenches to prevent entrapment.

The Vernal Pool and Road Rut and Species-Specific Protocols require a Minor Amendment (consistent with Section 6.5.1.2 of the HCP Amendment) for New Construction that impacts known or potentially occupied habitat for western spadefoot, arroyo toad, California red-legged frog, and southwestern pond turtle.

Estimated Impacts to Covered Amphibians and Reptiles and Their Habitats

Appendix A of the HCP Amendment summarizes the known occurrences and impact acreage for covered amphibian and reptile habitat within the PIZ. For each covered amphibian and reptile, the total percentage of habitat that may be impacted (permanently, temporarily, and/or by Wildfire Fuels Management) does not exceed 0.08% of the overall modeled habitat in the Plan Area (Table 3-6). Covered Activities are largely focused on O&M of existing Facilities, which typically have small footprints spread throughout the PIZ. Accordingly, it is unlikely that Covered Activities would impact or destroy an entire metapopulation or population of a covered amphibian and reptile occurrence. Additional direct impacts of covered amphibian and reptile occurrences could occur from New Construction outside the PIZ, but these potential impacts are also expected to be minimal as SDG&E does not anticipate any major New Construction. While O&M and New Construction may directly impact covered amphibians and reptiles, western spadefoot are not expected to be impacted by Wildfire Fuels Management, which would focus on removal of nonnative plants and more common native plants. With implementation of the Vernal Pool and Road Rut and Species-Specific Protocols, impacts to individual covered amphibians and reptiles and their habitats are expected to be avoided and minimized to the maximum extent practicable.

Covered Amphibian and Reptile Mitigation

Permanent impacts to all covered amphibian and reptile upland habitat would be mitigated in-kind and at a 2:1 ratio for impacts inside a Preserve or Proposed Preserve and at a 1:1 ratio for impacts outside of Preserve or Proposed Preserve (see Table 5.3a and 4 of the HCP Amendment). Permanent impacts to covered amphibian and reptile wetland habitat would be mitigated in-kind at a 2:1 to 4:1 ratio (see Table 5.3b and 4 of the HCP Amendment). Temporary impacts to covered amphibian and reptile habitat may be mitigated through the R/E Program per Section 5.2 of the HCP Amendment or treated as permanent and mitigated as previously described.

Permanent impacts to vernal pools occupied with western spadefoot would be mitigated at a 3:1 ratio if also occupied by covered plant species; a 2:1 ratio if also occupied by vernal pool indicator plant species, and a 1:1 ratio if no vernal pool plant Covered Species or indicator species are present (i.e., occupied road rut) (see Table 5.5 of the HCP Amendment). Mitigation for permanent impacts may occur on-site or within a Service-approved area. Temporary impacts would be restored as required by the Vernal Pool and Road Rut Protocols. Topsoil (inoculum) and/or vernal pool plant seed would be collected prior to any impacts so that it may be used for mitigation or restoration. If restoration is unsuccessful or if seed or vernal pool inoculum collection is not possible, impacts would be mitigated at a 3:1 ratio.

Covered Amphibians and Reptiles Impact Summary

Overall, impacts to covered amphibians and reptiles from Covered Activities are expected to be small, mostly temporary, and distributed over a large area through 2050. SDG&E would avoid and minimize impacts to covered amphibians and reptiles and their habitat to the greatest extent feasible, through continued implementation of its environmental review practices; application of generally applicable Operational Protocols, Vernal Pool and Road-Rut Protocols, and Species-Specific Protocols identified in Table 2-1 of this EA and detailed in Section 5.1 of the HCP Amendment; adherence to impact limits in the HCP Amendment; and mitigation for unavoidable impacts. Therefore, the Proposed Action is not expected to result in substantial direct mortality or substantial loss or degradation of habitat for covered reptiles and amphibians.

IMPACTS TO COVERED BIRDS

Thirteen covered birds may be impacted by Covered Activities. Work during the nesting season could injure or kill eggs or young. Noise-generating activities near active nests could result in nest abandonment by adults or young during the incubation, brooding, or fledgling period, leading to failure of egg development or mortality of juveniles through

starvation. There is also a potential for direct take from injury and/or mortality to birds through collision with vehicles. Existing Facilities and any bird strikes that currently occur as a result of their presence on the landscape are part of the existing conditions that would not change with issuance of the ITP. Avian species, excluding eagles, which are discussed in the following section, are addressed in this section.

Permanent impacts may include loss of habitat or degradation of habitat from edge effects including habitat conversion from altered wildfire frequency and introduction of invasive species. Potential temporary impacts include dust, light, noise, human presence, and temporary loss of habitat (before it is restored or grows back to pre-disturbance conditions). Impacts to habitat may displace covered birds, which can lead to decreased productivity, and increased predation and competition with nearby individuals of the same species.

Covered Birds Avoidance and Impact Minimization

In addition to the Operational Protocols discussed above, the HCP Amendment includes Species-Specific Protocols for tricolored blackbird, burrowing owl, coastal cactus wren, western snowy plover, western yellow-billed cuckoo, southwestern willow flycatcher, coastal California gnatcatcher, light-footed Ridgway's rail, California least tern, Belding's savannah sparrow, and least Bell's vireo (detailed in Section 5.1.13 of the HCP Amendment) that will be implemented whenever Covered Activities would be conducted in or near covered bird populations and their habitats. Permanent impacts to California least tern or western snowy plover nesting sites would be avoided, and potential impacts to other covered birds would be avoided to the greatest extent practicable. When work occurs within a known or potential area of occurrence of a covered bird with Species-Specific Protocols, focused surveys would occur within the appropriate nesting season. If project timing does not allow for surveys, it would be assumed that all habitat to be impacted is occupied. If a covered bird, including nests, is observed or assumed to be within the work area, it would be avoided to the greatest extent practicable, including working outside the nesting season. If avoidance is not feasible, SDG&E would confer with the Service to determine the best approach for minimization of impacts.

Species-Specific Protocols for southwestern willow flycatcher, light-footed Ridgway's rail, western yellow-billed cuckoo, and tricolored blackbird require a Minor Amendment (consistent with Section 6.5.1.2 of the HCP Amendment) for New Construction that impacts known or potentially occupied habitat.

Estimated Impacts to Covered Birds and Their Habitats

Appendix A of the HCP Amendment summarizes the known occurrences and impact acreage for covered bird habitat within the PIZ. For each covered bird, the total percentage of habitat that may be impacted (permanently, temporarily, and/or by Wildfire Fuels Management) does not exceed 0.21% of the overall modeled habitat in the Plan Area (Table 3-6). Covered Activities are largely focused on O&M of existing Facilities, which typically have small footprints spread throughout the PIZ. Accordingly, it is unlikely that Covered Activities would impact or destroy an entire metapopulation or population of a covered bird occurrence. Additional direct impacts of covered bird occurrences could occur from New Construction outside the PIZ, but these potential impacts are also expected to be minimal as SDG&E does not anticipate any major New Construction. While O&M and New Construction may directly impact covered birds, tricolored blackbird, western snowy plover, Belding's savannah sparrow, light-footed Ridgway's rail, or California least tern are not expected to be impacted by Wildfire Fuels Management, which would focus on removal of nonnative plants and more common native plants. With implementation of the Species-Specific Protocols, impacts to individual tricolored blackbird, burrowing owl, coastal cactus wren, western snowy plover, western yellow-billed cuckoo, southwestern willow flycatcher, coastal California gnatcatcher, light-footed Ridgway's rail, California least tern, Belding's savannah sparrow, and least Bell's vireo and their habitats are expected to be avoided and minimized to the maximum extent practicable.

Covered Birds Mitigation

Permanent impacts to least Bell's vireo, southwestern willow flycatcher and western yellow-billed cuckoo habitat require in-kind mitigation at a 3:1 ratio, while impacts to light-footed Ridgway's rail, tricolored blackbird, and Belding's savannah sparrow habitat require in-kind mitigation at a ratio ranging from 2:1 (non-tidal saltmarsh or freshwater marsh) to 5:1 (tidal saltmarsh), regardless of whether impacts are in a Preserve or Proposed Preserve (see Table 5.4 of the HCP Amendment). For tricolored blackbird, burrowing owl, coastal cactus wren, Belding's savannah sparrow, and coastal California gnatcatcher, permanent upland impacts would be mitigated in-kind at a 2:1 ratio and 1:1 ratio in or outside a Preserve/Proposed Preserve, respectively (see Table 4 of the HCP Amendment).

For other covered birds, permanent impacts to upland habitat would be mitigated at a 2:1 ratio for impacts inside a Preserve or Proposed Preserve and a 1:1 ratio for impacts outside of a Preserve or Proposed Preserve (see Table 5.3a of the HCP Amendment). Permanent impacts to wetland and riparian habitat would be mitigated at a 2:1 to 4:1 ratio

regardless of whether impacts are in a Preserve or Proposed Preserve (see Table 5.3b of the HCP Amendment). Temporary impacts to covered bird habitat may be mitigated through the R/E Program per Section 5.2 of the HCP Amendment or treated as permanent and mitigated as previously described.

Covered Birds Impact Summary

Overall, impacts to covered birds from Covered Activities are expected to be small, mostly temporary, and distributed over a large area through 2050. SDG&E would avoid and minimize impacts to covered birds and to the greatest extent feasible, through continued implementation of its environmental review practices; application of applicable Operational Protocols and Species-Specific Protocols identified in Table 2-1 of this EA and detailed in Section 5.1 of the HCP Amendment; adherence to the take limits in the HCP Amendment; and mitigation for unavoidable impacts. Therefore, the Proposed Action is not expected to result in substantial direct mortality or substantial loss or degradation of habitat for covered birds.

IMPACTS TO EAGLES

As discussed in the ECP (HCP Amendment, Appendix B), Covered Activities may result in nest disturbance. Eagles also may be directly impacted by interactions (electrocutions and collisions) with existing Facilities that result in injury and/or mortality. In addition, while the potential for nest removal is highly unlikely; there is a small chance that a nest may need to be removed due to the removal of a hazard tree or other emergency safety situation. Accordingly, the ECP evaluates potential impacts from nest removal.

Eagle Avoidance and Minimization Measures

For the past 16 years, SDG&E has implemented an Avian Protection Program, which includes goals of identifying high-priority areas where eagles and raptors have a high potential for direct mortality and targeting utility pole retrofits to Facilities that pose a higher risk of electrocuting birds.

Since 2005, SDG&E has retrofitted thousands of poles including retrofitting Facilities with avian protection equipment, reconfiguring the structure of the pole to increase wire (conductor) spacing or other adjustments to reduce potential eagle fatality, and/or replacing/rebuilding the existing pole according to APLIC Guidelines to minimize potential impacts to eagles. Over the course of the permit period, the potential for eagle fatalities is expected to decline year over year, particularly in rural and backcountry areas, as existing Facilities are rebuilt, and any new Facilities are built to avian safe design guidelines.

Absent an emergency involving human health and safety, when necessary, SDG&E would remove or trim an eagle nest outside of the breeding season (December 1 through July 31) to the extent practicable. Under the HCP Amendment, SDG&E would establish no-disturbance nest buffers, detailed in the ECP, during the eagle breeding season. It would follow the procedure developed with the Service and prescribed in the ECP to guide decisions about when and how to reduce buffers as needed.

Estimated Impacts to Eagles

SDG&E generated quantitative estimates of anticipated levels of take due to nest disturbance based on a review of known nesting territories in the vicinity of SDG&E Facilities. SDG&E quantified the risk of disturbance based on the proximity of nests to SDG&E Facilities and the potential for nest occupancy. SDG&E used disturbance risk to estimate the number of times an eagle nest could be disturbed over the permit term.

SDG&E derived electrocution estimates for golden eagles and bald eagles based on historical data extrapolated out for the permit term. Because collisions are not correlated with electric outage data and given the lack of established methodology for calculating collisions, SDG&E estimated collision take qualitatively, assuming them to be 50% of the anticipated electrocution mortalities.

Once SDG&E derived take estimates for each source of mortalities, it increased the estimates based on experience to ensure estimates were likely to capture all potential take. Table 3-7 summarizes estimated take associated with estimated nest disturbance, electrocutions, collisions, and nest removals (see ECP in Appendix B of the HCP Amendment).

Eagle Mitigation

To mitigate impacts to golden eagles, SDG&E would retrofit utility poles to avoid future loss through electrocution (Table 3-8). SDG&E would retrofit poles per a formula that calculates the number of poles needed to mitigate eagle mortality at a ratio 1.2:1 (i.e., 1.2 eagles saved for each eagle killed) consistent with the ECP Guidance (Service 2013) and in accordance with the 2016 Eagle Rule (Service 2016a, 2016b). SDG&E has proposed two approaches to mitigating impacts to golden eagles: short-term retrofits, involving the installation of covers or conductors that typically provide 10 years of avoided eagle loss, or long-term retrofits (reframing), where changes in the configuration of cross-arms and wires can yield up to 30 years of avoided loss.

Table 3-7. Estimated Incidental Take to Golden and Bald Eagles

Form of Take	Estimated Take					
	Quantitative Projections		Qualitative Projections (including contingency)		Total	
	Per 5 Years	30-Year Eagle Permit Term	Per 5 Years	30-Year Eagle Permit Term	Per 5 Years	30-Year Permit Term
Golden Eagle						
Nest Disturbance	6	36	6	36	12	72
Electrocution	4.3	26	0	0	4.3	26
Collision	0	0	2.1	13	2.1	13
Nest Removals ¹	0	0	2	12	2	12
Bald Eagle						
Nest Disturbance	1.1	7	2.3	14	3.5	21
Electrocution	2.1	13	0	0	2.1	13
Collision	0	0	1	6	1	6
Nest Removals ²	0	0	0.6	4	0.6	4

¹ Up to six alternate and six in-use golden eagle nests to be removed.

² Up to two alternate and two in-use bald eagle nests to be removed.

Table 3-8. Summary of Estimated Mitigation for Golden Eagles Over 30-Year Permit Period¹

Form of Take	30-Year Estimated Take	Mitigation Ratio Multiplier	Estimated Required Mitigation			
			Short-Term Retrofits		Long-Term Retrofits	
			Per Instance of Take	30-Year Eagle Permit Term	Per Instance of Take	30-Year Eagle Permit Term
Nest Disturbance	72	1.2	23.50	1,692	10.25	738
Electrocution	26	1.2	35.79	931	15.58	406
Collision	13	1.2	35.79	466	15.58	203
Nest Removal	12	1.2	NA	NA	NA	NA

NA = not applicable

¹ Mitigation for nest disturbance would stay ahead of forecasted impact estimates and would typically be completed within the first year of each 5-year permit period. Mitigation for collisions would be completed throughout each 5-year period and would be based on actual fatalities.

Under BGEPA, mitigation for impacts to bald eagles is only required once all authorized and permitted take exceeds the annual allotment for a flyway. SDG&E’s service area is within the Pacific Flyway South EMU, which has a bald eagle annual take allotment of 15 (Service 2016a). As of 2020, authorized take in this EMU was 2.85 out of the 15 allotted

eagles per year (Service 2020). The estimated bald eagle take associated with Covered Activities and through interactions with existing Facilities (fewer than two individuals per year; Section 4.3 of the ECP) would not increase annual take above this threshold. Because SDG&E's estimated take of bald eagles would not exceed the annual allotment for this EMU (Service 2016a, 2016b; 81 Fed. Reg. 91,494), Covered.

Activities and interactions with existing Facilities (fewer than two individuals per year; Section 4.3 of the ECP) would not increase annual take above this threshold. Because SDG&E's estimated take of bald eagles would not exceed the annual allotment for this EMU (Service 2016a, 2016b; 81 Fed. Reg. 91,494), compensatory mitigation is not required. If a bald eagle fatality is caused by its contact with existing Facilities, SDG&E would retrofit the pole where the fatality occurred to ensure no further deaths could occur that that pole. Although no specific habitat-based mitigation ratio is provided for impacts from Covered Activities to foraging habitat for eagles, both species are expected to benefit from general and species-specific mitigation required for Covered Activities.

SDG&E would mitigate when Covered Activities caused take by disturbing an eagle nest, as determined by the failure of the in-use nest. To determine nest fate, SDG&E must either conduct follow-up monitoring to determine the outcome of a nest (i.e., fledged young or failure) for the breeding season when the activity occurred or assume the nest failed. SDG&E would monitor annual disturbance take for comparison to estimated take and would review those amounts at 5-year intervals with the Service. If eagle take approaches or exceeds take limits, SDG&E would consult with the Service to determine appropriate responses.

Eagles Impact Summary

With incorporation of the Operational Protocols, no-disturbance nest buffers, mitigation (through utility pole retrofits), and monitoring, the Proposed Action is not anticipated to result in any significant impact to golden and bald eagle populations.

IMPACTS TO COVERED MAMMALS

The Stephens' kangaroo rat, Pacific pocket mouse, and Peninsular bighorn sheep may be impacted by Covered Activities. Both small mammals occupy underground burrows during the day and come above ground at night. The Pacific pocket mouse occurs in habitats that are sensitive to soil compaction since the species requires loose, sandy soils for digging. The Stephens' kangaroo rat prefers much harder soils in areas of disturbance with low-growing vegetation. Covered Activities could cause direct mortality or injury of covered small mammals during ground-disturbing activities, as well as vehicle and

equipment travel across their habitats. Covered Activities and habitat enhancement activities are mostly likely to result in direct impacts to these species while they are in underground burrows. Vehicles or equipment operating over a burrow entrance could collapse the entrance and entomb an animal and cause injury or mortality. Indirect impacts could result from ground vibration caused by large activities, which could affect behavior during breeding season and reduce reproductive success.

The sudden appearance of a helicopter or drone may startle Peninsular bighorn sheep and cause an accidental fall or, if close to roads, cause them to move out onto roadways where a collision with a vehicle may occur. Peninsular bighorn sheep may also move into work areas and/or get struck by work vehicles. Ground crews and equipment working in Peninsular bighorn sheep habitat may produce indirect impacts in the form of noise, light, or human presence.

Peninsular bighorn sheep use lambing areas from January through June to give birth to and for early rearing of lambs. Covered Activities in or near lambing areas during the lamb season pose a significant potential risk to Peninsular bighorn sheep. Causing ewes to move at this time may increase the chance that individuals will be injured, increase predation risk, cause an accidental fall or, if close to roads, cause them to move out onto roadways where collisions can occur. Newborn lambs are also at risk as they need time to gain strength and balance and are at risk of experiencing falls if forced to move at too young an age. In addition, if a newborn lamb is forced to move too soon, the lamb may experience increased predation risk. Ewes also leave their lambs in the shady protection of boulders and if forced to move from these shaded locations may suffer heat stress as well as increased predation risk.

Water availability is critical to Peninsular bighorn sheep especially during the summer months. Activities near water sources may temporarily preclude Peninsular bighorn sheep use of the water source. Construction of permanent facilities with associated O&M may permanently preclude or diminish Peninsular bighorn sheep use of the water source, which would be detrimental especially during hotter portions of the year.

Additionally, increased human presence, noise, and nighttime lighting from Covered Activities, and edge effects associated with New Construction could affect covered mammal species abundance, habitat quality, and behavior.

Covered Mammals Avoidance and Impact Minimization

In addition to the Operational Protocols discussed above, the HCP Amendment includes Species-Specific Protocols for covered mammals that would be implemented whenever Covered Activities would be conducted in or near their populations and habitats. First, potential impacts to covered mammals would be avoided to the greatest extent practicable. In addition, Species-Specific Protocols for the small mammals require SDG&E to avoid areas of active burrows; employ a Biologist to flag ingress/egress routes to avoid burrows and monitor Covered Activities; require crews to use hand tools when digging in areas of concern for these species; require crews to remain on existing roadways where possible and distribute the weight of vehicles and equipment during overland travel when remaining on roadways is not possible; and ensure species are not trapped within holes or trenches overnight. SDG&E would also install exclusion fencing when needed to conduct exclusion trapping and to remove species from work areas.

Species-Specific Protocols for Peninsular bighorn sheep require SDG&E to avoid covered activities (including the use of helicopters and unmanned aerial vehicles) inside known lambing areas during the lambing season (January 1 through June 30), and in PBS perennial water sources during the period of greatest water need (May 1 through September 31) to the maximum extent practicable; maintain a 1,500-foot buffer for helicopter-based crews and a 500-foot buffer for ground crews if Peninsular bighorn sheep are observed in a work area; and halt work if Peninsular bighorn sheep enter a work area until the individuals have left, or are slowly flushed by a biologist from the work area.

Species-Specific Protocols for covered mammals also require a Minor Amendment (consistent with Section 6.5.1.2 of the HCP Amendment) for New Construction that impacts known or potentially occupied habitat.

Estimated Impacts to Covered Mammals and Their Habitats

Appendices A and C of the HCP Amendment summarizes the known occurrences and impact acreage for covered mammal habitat within the PIZ. For each covered mammal, the total percentage of habitat that may be impacted (permanently, temporarily, and/or by Wildfire Fuels Management) does not exceed 0.09% of the overall modeled habitat in the Plan Area (Table 3-6). Covered Activities are largely focused on O&M of existing Facilities, which typically have small footprints spread throughout the PIZ. Accordingly, it is unlikely that Covered Activities would impact or destroy an entire metapopulation or population of a covered mammal occurrence. Additional direct impacts of covered mammal occurrences could occur from New Construction outside the PIZ, but these

potential impacts are also expected to be minimal as SDG&E does not anticipate any major New Construction. With implementation of the Species-Specific Protocols, impacts to individual covered mammals and their habitats are expected to be avoided and minimized to the maximum extent practicable.

Covered Mammals Mitigation

Under the Species-Specific Protocols, SDG&E would be required to mitigate for unavoidable impacts via an in-lieu fee for Pacific pocket mouse (see Section 5.5.6. of the HCP Amendment), and for Stephens' kangaroo rat at a 3:1 ratio (see Section 5.5.2.1. of the HCP Amendment). Permanent impacts to Peninsular bighorn sheep habitat would be mitigated at a 2:1 ratio for impacts inside a Preserve or Proposed Preserve and a 1:1 ratio for impacts outside of a Preserve or Proposed Preserve (see Table 5.4 of the HCP Amendment). Temporary impacts to Pacific pocket mouse and Peninsular bighorn sheep habitat would be mitigated through the R/E Program per Section 5.2 of the HCP Amendment or treated as permanent and mitigated as previously described.

Covered Mammals Impact Summary

Overall, impacts to covered mammals from Covered Activities are expected be small, mostly temporary, and distributed over a large area over the through 2050. SDG&E would avoid and minimize impacts to covered mammals and their habitat to the greatest extent feasible, through continued implementation of its environmental review practices, application of applicable Species-Specific Protocols identified in Table 2-1 of this EA and detailed in Section 5.1 of the HCP Amendment for all mammal species, adherence to the take limits in the in the HCP Amendment, and mitigation for unavoidable impacts. Therefore, the Proposed Action is not expected to result in substantial direct mortality of Stephens' kangaroo rat and Pacific pocket mouse, or any of Peninsular bighorn sheep, or substantial loss or degradation of habitat for all covered mammal species.

IMPACTS TO CRITICAL HABITAT

Critical habitat for 16 Covered Species (6 plants and 10 wildlife) may be directly and indirectly impacted by Covered Activities as discussed for Covered Species above.

Critical Habitat Avoidance and Impact Minimization

In addition to the Operational Protocols discussed above, the Narrow Endemic, Vernal Pool and Road Rut, and Species-Specific Protocols will avoid and minimize potential impacts to critical habitat. In addition, new Facilities will be planned and constructed in a manner that avoids or minimizes impacts to critical habitat, while not impairing SDG&E's

Table 3-9. Anticipated Permanent, Temporary, and Wildfire Fuels Management Critical Habitat Impacts (acres)

Common Name	Total Designated Critical Habitat	Plan Area	PIZ	Undeveloped PIZ ²	Percentage of Undeveloped PIZ Where There Is Critical Habitat ³	Permanent Impacts ¹					Temporary Impacts ¹			Wildfire Fuels Management ¹			Total Impacts through 2050 (%) ¹⁰
						Annual Impacts ⁴	Total O&M and New Construction Impacts through 2050 ⁵	O&M Impacts through 2050 ⁶	New Construction Impacts through 2050 ⁶	Percentage of Total Designated Critical Habitat Impacted through 2050 ⁷	Annual Impacts ⁸	Impacts through 2050 ⁵	Percentage of Total Designated Critical Habitat Impacted through 2050 ⁷	Annual Impacts ⁹	Impacts through 2050 ⁵	Percentage of Total Designated Critical Habitat Impacted through 2050 ⁷	
Plants (6)																	
San Diego thorn-mint	671	671	12	11.66	0.02%	<0.01	0.10	0.08	0.02	0.01%	<0.01	0.06	0.01%	<0.01	0.05	0.01%	0.20 (0.03)
San Diego ambrosia	783	594	124	68.60	0.14%	0.02	0.56	0.47	0.09	0.07%	0.01	0.33	0.04%	0.01	0.30	0.04%	1.18 (0.15)
Thread-leaved brodiaea	2,950	1,558	211	124.55	0.26%	0.03	1.02	0.85	0.17	0.03%	0.02	0.59	0.02%	0.02	0.54	0.02%	2.15 (0.07)
Otay tarplant	6,333	6,333	770	671.57	1.38%	0.18	5.49	4.58	0.91	0.09%	0.11	3.20	0.05%	0.10	2.90	0.05%	11.60 (0.19)
Willowy monardella	122	122	3	0.03	<0.01%	<0.01	<0.01	<0.01	<0.01	<0.01%	<0.01	<0.01	<0.01%	<0.01	<0.01	<0.01%	<0.01 (0.03)
Spreading navarretia	6,725	1,068	69	47.06	0.10%	0.01	0.38	0.32	0.06	0.01%	0.01	0.22	<0.01%	-	-	-	0.61 (0.02)
Wildlife (10)																	
San Diego fairy shrimp	2,933	2,918	218	138.57	0.28%	0.04	1.13	0.95	0.19	0.04%	0.02	0.66	0.02%	-	-	-	1.79 (0.06)
Riverside fairy shrimp	1,670	914	21	18.14	0.04%	<0.01	0.15	0.12	0.02	0.01%	<0.01	0.09	0.01%	-	-	-	0.23 (0.02)
Hermes copper butterfly	35,052	35,052	2,436	1,833.42	3.77%	0.50	15.00	12.51	2.49	0.04%	0.29	8.75	0.02%	0.26	7.91	0.02%	31.66 (0.09)
Laguna Mountains skipper	6,259	6,259	83	59.23	0.12%	0.02	0.48	0.40	0.08	0.01%	0.01	0.28	<0.01%	0.01	0.26	<0.01%	1.02 (0.03)
Arroyo toad	98,428	64,133	3,613	2,243.69	4.61%	0.61	18.36	15.31	3.05	0.02%	0.36	10.70	0.01%	0.32	9.68	0.01%	38.7 (0.04)
Western snowy plover	25,263	405	14	10.11	0.02%						<0.01	0.05	<0.01%	-	-	-	0.05 (0.01)
Southwestern willow flycatcher	209,131	5,373	246	167.86	0.34%	0.05	1.37	1.15	0.23	<0.01%	0.03	0.80	<0.01%	0.02	0.72	<0.01%	2.90 (0.03)
Coastal California gnatcatcher	197,427	80,372	6,313	3,389.15	6.96%	0.92	27.73	23.12	4.60	0.01%	0.54	16.17	0.01%	0.49	14.62	0.01%	58.52 (0.03)
Least Bell's vireo	36,991	13,416	2,038	379.92	0.78%	0.10	3.11	2.59	0.52	0.01%	0.06	1.81	<0.01%	0.05	1.64	<0.01%	6.56 (0.03)
Peninsular bighorn sheep	376,938	261,489	661	633.06	1.30%	0.17	5.18	4.32	0.86	<0.01%	0.10	3.02	<0.01%	-	-	-	8.20 (0.02)

¹ Note that anticipated impacts to Critical Habitat have been calculated to provide an approximation of the potential impacts on Critical Habitat for each Covered Species. Actual impacts on Critical Habitat would be assessed, avoided, and minimized through the existing Pre-activity Survey Report [PSR] process. Note all numbers rounded after calculations completed.

² Critical Habitat with agriculture and developed areas removed per the process described in HCP Amendment Section 4.1.3.

³ The portion of the PIZ with undeveloped habitat totals 48,665 acres. The percentage represents Critical Habitat within the undeveloped PIZ divided by 48,665 acres.

⁴ Based on SDG&E historical impact trends under the Subregional Plan for the period of 1996 through 2018, an average of approximately 11.54 acres of total impacts is expected on an annual basis with implementation of O&M and New Construction. The average annual total impacts (11.54 acres) was multiplied by the percentage of PIZ supporting Critical Habitat for a given species to estimate the permanent impacts on Critical Habitat on an annual basis. This total was increased by 15% to accommodate unanticipated impacts. For example, to estimate the impact to Otay tarplant, 11.54 acres was multiplied by 1.38% (i.e., percent within PIZ). This equals approximately 0.16 acre. This amount was increased by 0.02 acre (i.e., 15% of 0.16 acre) for a total of 0.18 acre of permanent impacts.

⁵ To be conservative, annual average multiplied by 30 years.

⁶ Based on historical data, New Construction was assumed to represent 16.6% of the total O&M and New Construction impact estimate. O&M represents the difference between the total impacts and New Construction impacts.

⁷ To be conservative, total impacts over 30 years divided by all designated Critical Habitat.

⁸ Based on SDG&E historical impact trends under the Subregional Plan for the period of 1996 through 2018, an average of approximately 6.73 acres of temporary impacts is expected on an annual basis with implementation of O&M and New Construction. The average annual temporary impacts (6.73 acres) was multiplied by the percentage of PIZ supporting Critical Habitat for a given species to estimate the temporary impacts on Critical Habitat on an annual basis. This total was increased by 15% to accommodate unanticipated impacts.

⁹ Based on SDG&E's 2019 Pilot Study (see HCP Amendment Section 4.4), SDG&E assumed that up to 100 acres per year will undergo Wildfire Fuels Management through 2050, and that a 7% net percent reduction of native canopy cover will be consistent, on average, over the remaining permit term; resulting in 7 acres of habitat impacts per year. The percentage of the undeveloped portion of PIZ that consisted of Critical Habitat for applicable Covered Species was quantified, and this percentage was multiplied by Wildfire Fuels Management annual impact estimate of 7 acres per year, to estimate the impacts on Critical Habitat on an annual basis. Species with no impacts within the table will not be impacted by Wildfire Fuels Management because Wildfire Fuels Management would not have direct habitat impacts on Peninsular bighorn sheep, vernal pool species, or beach species.

¹⁰ Total permanent, temporary, and Wildfire Fuels Management impacts.

ability to meet the service demands of its customers in accordance with its responsibilities as a utility company serving the public. Additionally, impacts to greater than 1.75 acres of critical habitat will require a Minor Amendment as outlined in Section 6.5.1.2 of the HCP Amendment.

Estimated Impacts to Critical Habitats

Appendix A and C of the HCP Amendment summarizes the potential impacts to designated critical habitats within the PIZ. Total impacts to designated critical habitat for Covered Species would range from 0.02% to 0.19% of the total critical habitat designation for each species (Table 3-9). However, these impacts are likely overestimates because New Construction is not expected to occur at the same rate as in the past; critical habitat is not evenly distributed throughout the PIZ; and O&M Covered Activities typically occur in small, dispersed, and localized areas along linear corridors within the PIZ. Accordingly, impacts would likely be more evenly distributed throughout the PIZ and would not always occur in critical habitat.

Critical Habitat Mitigation

If permanent impacts to critical habitat cannot be avoided, then SDG&E will first attempt to mitigate with credits in the existing mitigation lands that have critical habitat for the same species or acquire other lands that are designated as critical habitat. Only if no critical habitat is available from the existing mitigation lands or as an acquisition of new habitat lands, SDG&E will provide a justification for acquiring, restoring, and/or enhancing suitable habitat land that will benefit the species and/or its critical habitat, with the concurrence of the Service.

Critical Habitat Impact Summary

Overall, impacts to critical habitat from Covered Activities are expected to be small, mostly temporary, and distributed over a large area through 2050. SDG&E would avoid and minimize impacts to critical habitat to the greatest extent feasible, through continued implementation of its environmental review practices; application of applicable Operational Protocols, including Narrow Endemic, Vernal Pool and Road Rut, and Species-Specific Protocols identified in Table 2-1 of this EA and detailed in Section 5.1 of the HCP Amendment; adherence to the impact limits in the HCP Amendment; and mitigation for unavoidable impacts. Therefore, the Proposed Action is not expected to result in substantial loss or degradation of critical habitat.

3.2.3 CUMULATIVE EFFECTS

Development and urbanization have led to the loss of the Plan Area's native grassland, scrub, woodlands, forests, and riparian/wetland habitats. As a result, approximately 87% of vegetation communities in the PIZ are agriculture, disturbed habitat, eucalyptus woodland, and urban/developed. Upland habitat and riparian and wetland cover 12% and 1% of the PIZ respectively. Covered Activities in the HCP Amendment may cause additional impacts to Covered Species and reduce their populations and habitats. However, the Proposed Action's contribution to this aggregate effect, by authorizing incidental take of Covered Species associated with no more than 820 acres of habitat impacts in the Plan Area, is expected to be minimal considering the size of the 2,815,930-acre Plan Area.

Impacts from Covered Activities are expected to be mostly small scale, temporary, and dispersed over linear utility rights-of-way within the existing PIZ. Moreover, the HCP Amendment prioritizes avoidance and minimization of impacts to Covered Species and their habitats to the extent feasible, then mitigates for unavoidable impacts. Under the HCP Amendment, avoidance or minimization of biological impacts to Covered Species or habitat would be accomplished through implementation of 98 Operational Protocols (identified in Table 2-1), including Narrow Endemic Plant Protocols, Vernal Pool and Road Rut Protocols, and Species-Specific Protocols. Mitigation for any unavoidable impacts would be accomplished through habitat restoration and enhancement or use of Mitigation Credits. The ECP includes avoidance measures and the continuation of utility pole retrofits to offset potential impacts. Thus, while approval of the HCP Amendment and issuance of an ITP would authorize take associated with less than 0.04% of the total acreage of the Plan Area, those impacts would be adequately minimized and mitigated by the HCP Amendment and ECP conservation strategies. Wildfire Fuels Management could also provide a long-term benefit to Covered Species and their habitats by reducing fuel loads, which may lessen the severity and reduce the risk of wildfires.

For these reasons, the Proposed Action is not expected to result in significant cumulative impacts to biological resources, including the 41 Covered Species and their habitats.

3.3 CULTURAL RESOURCES

3.3.1 AFFECTED ENVIRONMENT

Cultural resources, including historical resources, archaeological resources, human remains, and tribal cultural resources, could occur throughout the Plan Area. Tribal cultural resources can include sites, features, places, sacred places, objects with cultural value to a Native American tribe, or cultural landscapes that are geographically defined in terms of the size and scope of the landscape. In general, prehistoric habitation sites are more likely to be located near streams or other water sources and in sheltered, relatively flat areas. But prehistoric campsites or special use sites may be located elsewhere on the landscape. In addition, historic habitation sites can be predicted based on historic maps or historical accounts, but some habitations and special use sites (e.g., mines, refuse deposits) were never mapped. In developed areas, both historic and prehistoric resources may still be present subsurface.

However, the majority of the Plan Area would not be affected by Covered Activities. O&M and on-site restoration would be conducted within or immediately adjacent to existing SDG&E rights-of-way in the PIZ; thus, the potential for significant impacts to cultural resources is considered low during O&M and on-site restoration. Additional direct impacts at unknown locations could also occur from New Construction and off-site restoration outside the PIZ, but these potential impacts are expected to be minimal as SDG&E does not anticipate any major New Construction and off-site restoration is expected to have little impact on the landscape.

3.3.2 ENVIRONMENTAL CONSEQUENCES

Ground disturbance associated with Covered Activities, especially New Construction and off-site restoration, could damage cultural resources on or below the ground surface. To avoid, minimize, or mitigate impacts to cultural resources, SDG&E does and will continue to implement a comprehensive approach for reviewing O&M and New Construction to ensure compliance with applicable laws and regulations pertaining to cultural resources.

SDG&E employs Cultural Resource Specialists, all of whom meet the Secretary of the Interior's Professional Qualifications Standards for archaeology or historic preservation or have materially equivalent qualifications. Using the significance criteria outlined in the National Register of Historic Places and the California Register of Historical Resources, these Cultural Resource Specialists work closely with environmental, engineering, and

construction personnel to ensure SDG&E's O&M and New Construction comply with all applicable cultural resource laws and regulations, as well as with SDG&E's internal cultural resources protection practices. SDG&E is committed to complying with applicable federal, state, and local laws and regulations protecting cultural resources including, but not limited to, the Native American Graves Protection and Repatriation Act (NAGRPA), National Historic Preservation Act (NHPA), Archaeological Resources Protection Act of 1979 (ARPA), NEPA, California Environmental Quality Act (CEQA), San Diego County Resource Protection Ordinance, and requirements of Section 5097.98 and 7050.5 of the California Public Resources Code (related to discovery of human remains). The scope of the review and level of oversight of the Cultural Resource Specialists depend on multiple factors, including the type of activity; extent of ground disturbance; location of utility Facilities; land ownership; and proximity to known or potential protected cultural resources. SDG&E's Cultural Resource Specialists are also responsible for developing and maintaining working relationships with Native American communities throughout SDG&E's service area. Further, SDG&E's Director of Tribal Relations and Land Services meets regularly with tribal governments to address concerns or answer questions about SDG&E projects.

Prior to commencing ground-disturbing Covered Activities, SDG&E Cultural Resource Specialists have and will continue to screen applicable ground-disturbing activities (regardless of whether a known cultural or tribal resource is present) to avoid disturbing cultural resources. These Specialists also apply notification requirements to ensure a Cultural Resource Specialist is notified of any discoveries. Moreover, where appropriate, SDG&E requires resource protection measures that may include prohibiting vehicles, staging, or construction within resource boundaries; identifying routes to avoid cultural or tribal resources; and assigning an archaeological and/or Native American construction monitor within known or suspected archaeological sites. Where applicable, SDG&E construction personnel also undergo both general cultural resources awareness training and project-specific cultural resources training in construction areas where cultural resources are known to occur.

SDG&E also implements cultural resources protection measures to help avoid disturbing unknown cultural resources. If cultural resources are inadvertently discovered, construction activities must cease at the discovery location until a qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate treatment measures in consultation with an SDG&E Cultural Resource Specialist. In the rare event that human remains are discovered, SDG&E complies with all relevant laws and requirements.

SDG&E has measures in place for Covered Activities to protect cultural resources. These measures will continue to be implemented irrespective of the Proposed Action. The additional impact acreages, updated Covered Species list, and revised Operational Protocols associated with the HCP Amendment would not change how SDG&E implements its existing program to protect cultural and tribal resources. Nor would the HCP Amendment hinder, hamper, or have any other impact on SDG&E's ability to carry out its cultural resource protection protocols or change how SDG&E complies with applicable local plans, and policies or regulations regarding cultural resources.

Regardless of the Service's approval of the HCP Amendment and issuing an ITP, SDG&E will continue to screen ground-disturbing Covered Activities for their potential to affect cultural resources to avoid and minimize their potential. It will also continue implementing protection measures and project-specific cultural resources training in known culturally sensitive areas. To avoid impacts to unknown cultural resources, SDG&E will continue implementing general protection measures and general cultural awareness training for applicable staff in ground disturbance areas. SDG&E will also continue to comply with all applicable state and federal cultural resource laws and regulations. It will also continue to follow its internal processes for the stewardship and protection of cultural resources. SDG&E will continue to comply with regulations pertaining to the discovery of human remains.

Moreover, SDG&E's implementation of 98 Operational Protocols as required by the HCP Amendment (and identified in Table 2-1 of this EA) may incidentally lower any potential impact to cultural resources from Covered Activities. Therefore, impacts from the Service's approval of the HCP Amendment and issuing an ITP on cultural or tribal resources are expected to be limited and insignificant.

3.3.3 CUMULATIVE EFFECTS

Because Covered Activities may require ground disturbance, the Proposed Action may damage or destroy buried cultural materials. SDG&E's continued implementation of the cultural resource protection protocols, as well as SDG&E's implementation of Operational Protocols (identified in Table 2-1 of this EA and described in Section 5.1 of the HCP Amendment), which avoid and minimize ground disturbance from Covered Activities, would avoid, minimize, and mitigate any cumulative impact to cultural or tribal cultural resources to the maximum extent practicable. Any residual effect would not represent a cumulatively considerable contribution, nor would it result in a cumulatively considerable effect.

3.4 ENVIRONMENTAL CONSEQUENCES OF THE NO ACTION ALTERNATIVE (FOR ALL RESOURCE AREAS)

As described in Section 2.2.2, No Action Alternative, the Service would not approve the HCP Amendment or issue an amended ITP under the No Action Alternative. Existing Operational Protocols would not be updated and would remain the same as currently required by the Subregional Plan. There would be no clarification or expansion of the restoration activities that SDG&E can implement to successfully restore temporary impacts.

SDG&E would continue implementing the Subregional Plan; however, because there would be no increase to the 400 acres of impacts allowed, once the allowable impact acreage is exhausted (currently estimated for 2023), SDG&E could no longer comply with the Subregional Plan, which requires an amendment, and ITP No. PRT-809637 would no longer authorize take of ESA-listed species.

SDG&E would thereafter operate without the ITP and would instead conduct O&M as required by applicable law, including either section 7 or section 10 of the ESA as needed, with individual projects permitted on a project-by-project basis. SDG&E would likely continue to try to avoid impacts on ESA-listed species; however, it would no longer be required to implement the Operational Protocols developed with the Wildlife Agencies to reduce and/or minimize impacts to Covered Species and their habitats as detailed in the HCP Amendment. Nor would it have to mitigate for impacts to species habitat as required under the HCP Amendment. Species would, therefore, not have the same level of protection. The framework provided in the ECP for avoiding and minimizing eagle fatalities from interactions with existing infrastructure and from potential disturbance related to Covered Activities would also not be adopted. Related mitigation requirements would not be implemented, and eagles would continue to be covered as part of the Subregional Plan.

The updated Narrow Endemic, Vernal Pool and Road Rut, and Species-Specific Protocols would not be implemented. The updated Vernal Pool and Road Rut Protocols help clarify and add protections for areas that need to be protected while allowing SDG&E to work in areas that do not contain vernal pools. The Species-Specific Protocols identify measures taken to avoid and/or minimize impacts to Covered Species. Thus, beneficial effects of these updated protocols that extend beyond merely avoiding take of listed species, including those that allow both the species to be conserved and SDG&E to

conduct necessary O&M, which is necessary for continued power transmission, would not occur.

The large volume and need for prompt repair may make implementation of project-by-project permitting challenging, inefficient, and costly, and may cause schedule delays. A project-by-project conservation approach would likely include protections for fewer species as any requirements would be focused on the small individual project location and biological conditions associated only with that activity. Mitigation for impacts to listed species by individual projects would be neither cohesive nor coordinated as part of SDG&E's long-term, large-scale regional conservation effort begun under the Subregional Plan and carried forward with the HCP Amendment. The project-by-project approach to mitigation would be fragmented and less beneficial to species than coordination with a regional conservation strategies effort of high value lands as would result from the Project.

Under the No Action Alternative, SDG&E would continue to implement their standard cultural and tribal resource protection protocols and measures as described in Section 3.3, Cultural Resources, to avoid or reduce the potential for impact to sensitive resources. Thus, the potential for impact to cultural or tribal cultural resources would be the same as that described under the Proposed Action.

3.5 UNAVOIDABLE ADVERSE EFFECTS

As detailed in this chapter, the Service does not anticipate any unavoidable adverse effects resulting from issuance of the ITP and implementation of the HCP Amendment. Issuance of the ITP by the Service and implementation of the HCP Amendment by SDG&E would not substantially change the environmental effects of SDG&E's Covered Activities beyond existing baseline conditions, and the HCP Amendment is designed to improve on the conservation strategy in the Subregional Plan and to provide a net benefit to Covered Species and their habitats.

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CHAPTER 4 CONSULTATION AND COORDINATION

4.1 TRIBAL CONSULTATION AND COORDINATION

Secretarial Order 3206, *American Indian Tribal Rights, Federal-Tribal Trust Responsibilities, and the Endangered Species Act*, seeks to strengthen government-to-government relations, streamline the consultation process, and ensure full tribal representation. The Service sent an electronic letter dated March 24, 2020, to all federally recognized tribes within the Plan Area to inform them of the proposed HCP Amendment and this EA. No response was received. After sending the first letter, the Service and SDG&E decided to include bald and golden eagles as covered species and an ECP in the HCP Amendment. The Service then sent out a second electronic letter dated July 28, 2021, to all federally recognized tribes within a 109-mile radius of the Plan Area to inform them again of the proposed HCP Amendment and this EA and specifically called attention to the ECP, which may be of high importance for some tribes. In response to the second letter, the Service received an email from the San Manuel Band of Mission Indians (San Manuel Band) and La Jolla Band of Luiseño Indians (La Jolla Band). The San Manuel Band email stated that the proposed project is located outside of Serrano ancestral territory and, as such, they will not be requesting to receive consulting party status with the lead agency or to participate in the scoping, development, or review of documents created pursuant to legal and regulatory mandates. The La Jolla Band email stated their concerns about impacts to listed species and especially to bald and golden eagles and requested government to government consultation on the HCP Amendment. The email also included several questions and concerns regarding the HCP Amendment.

In response to the specific questions and concerns raised by the La Jolla Band, the Service initiated formal government to government consultation on the HCP Amendment. Under this consultation, the Service provided answers to the La Jolla Band's questions in an August 31, 2021, electronic letter. Following transmission of that letter, representatives from the La Jolla Band and the Service met virtually on November 18, 2021, to discuss their questions and concerns. At the meeting, the La Jolla Band requested a process for reporting eagle mortalities related to SDGE's activities and facilities and, if possible, making eagle remains available to local Tribes. In response to La Jolla Band's request, the Service developed an eagle remains reporting and retention process that will be included in the HCP Amendment. This is a new process and subject to change if needed. It addresses remains found on Tribal trust land within the SDGE service area for Tribes

that hold a Native American Tribal Eagle Retention permit. Please note, information about the Tribal permit application can be found at the Native American Tribal Eagle Retention permit website ([Native American Tribal Eagle Retention](#)). The Service forwarded this process to the La Jolla Band in a July 20, 2022, electronic letter and asked for their confirmation that formal government to government consultation was completed.

The Service then sent an electronic letter dated August 9, 2022, to all federally recognized tribes within a 109-mile radius of the Plan Area to inform them of the publication of the notice of availability (NOA) for the ITP application for the HCP Amendment in the Federal Register. The Service did not receive any comments from tribes on the NOA. However, in response to the July 20, 2022, electronic letter Chairwoman Norma M. Contreras confirmed in an email dated August 23, 2022, that the La Jolla Band has no further questions and that consultation was completed.

4.2 SECTION 7 CONSULTATION UNDER THE ESA

The Service is in the process of conducting the internal formal consultation process for the 41 Covered Species under section 7(a)(2) of the Act. The Service will include the results of that consultation in its decision record for the proposed action.

4.3 SCOPING

The Service did not conduct public scoping prior to preparing this environmental assessment. The implementing regulations for NEPA (40 Code of Federal Regulations 1501.9) do not require scoping for environmental assessments.

4.4 PUBLIC REVIEW

The Service issued the Draft EA for public review and comment with a Notice of Availability published in the Federal Register on August 10, 2022. The public review period was open through September 9, 2022, and four comment letters were received. The comment letters and the Service's responses are provided in Appendix B of this Final EA.

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U. S. Fish and Wildlife Service (Service). 2000. Recovery Plan for Bighorn Sheep in the Peninsular Ranges, California. U.S. Fish and Wildlife Service Region 1. December 25.

APPENDIX A

SAN DIEGO GAS & ELECTRIC COMPANY HABITAT CONSERVATION PLAN AMENDMENT

(provided under separate cover)

APPENDIX B

**COMMENT LETTERS AND
RESPONSES TO COMMENTS**

This appendix includes copies of the original comment letters received followed by a table breaking out each of the comments from the letters and the Service's response to each individual comment.



File Code: 2670
Date: September 7, 2022

Scott Sobiech
Field Supervisor
US Fish and Wildlife Service
2177 Salk Avenue, Suite 250
Carlsbad, California 92008

Subject: Environmental Assessment for the San Diego Gas & Electric Company Habitat Conservation Plan Amendment

Dear Mr. Sobiech,

Thank you for the opportunity to review the environmental documentation for the San Diego Gas and Electric Conservation Plan Amendment. The Forest has the following comments regarding Appendix A, Covered Species Analysis:

Section 3.3 - Laguna Mountains Skipper

Page 97. Distribution, Abundance, and Trends – “The species was last seen in the Laguna Mountains in 1999 and is considered extirpated from that area (USFWS 2019b).”

Page 99. Presence within Plan Area and PIZ – “, the only known population of this species is concentrated on Palomar Mountain”

Page 100. Potential Impacts, Effects on Population Viability and Species Recovery - PIZ does overlap “ “Although this species is extirpated from the Laguna Mountains, the PIZ does overlap with locations of historical records and it is possible the species could be reintroduced to these areas in the future.”

Laguna Mountains Skipper was reintroduced to the Laguna Mountains in 2021.

Section 3.4 - Hermes Copper

Page 102 and 103. Distribution, Abundance, and Trends – “Relative to the Plan Area in San Diego County, extant populations are known to occur in Lopez Canyon, Mission Trails, Admiral Baker, Crestridge, Boulder Creek Road, South Guatay Mountain, Descanso, Japatul, Alpine, Loveland Reservoir, Hidden Glen, McGinty Mountain, Rancho San Diego, Sycuan Peak, Gaskill Peak, Lawson Valley, Hartley Peak, and Potrero (USFWS 2018, 2020a)”



This list includes many locations that appear to be extirpated including Lopez Canyon, Mission Trails, Admiral Baker, Crestridge, South Guatay Mountain, Descanso, Japatul, Alpine, Loveland Reservoir, Hidden Glen, McGinty Mountain, Rancho San Diego, Sycuan Peak, Gaskill Peak, Lawson Valley, Hartley Peak, and omits some that are extant (Roberts Ranch, Bell Bluff).

Page 110. Figure 3-2 Critical Habitat Invertebrates - Laguna Mt Skipper and Quino Checkerspot designated critical habitat is not shown on the map.

Thank you for your consideration of these comments. If you have questions about this information, please contact Kirsten Winter, Forest Biologist at kirsten.winter@usda.gov

Sincerely,

SCOTT TANGENBERG
Forest Supervisor

COMMENT/RESPONSE MATRIX

**SAN DIEGO GAS AND ELECTRIC HCP AMENDMENT PACKAGE REVIEW
COMMENTS DUE 31 AUG 22**

#	Page	Section/ Line	Reviewer	Comment	Response
<i>Draft Environmental Assessment for SDGE Habitat Conservation Plan (content doc)</i>					
1.	53-55	Table 3-6 and Species- Specific Habitat Mitigation (also Table 9.1 of HCP)	Camp Pendleton	<p>PPM mitigation doesn't seem commensurate to similar work being done on Camp Pendleton. \$150,000 is proposed to compensate for 1.5ac direct permanent impacts and 0.87 ac direct temporary impacts to PPM habitat (Table 3-7) = \$100k/ac of impact (all impact types).</p> <p>The 2021 SCE Right-of-Way Maintenance BO (FWS-MCBCP-11B0365-21F0) identifies \$680,211 to compensate for 0.24 direct permanent impacts, 1.06 direct temporary impacts, and 4.17 indirect temporary impacts = \$124k/ac of impact (all impact types) or \$523k/ac (direct impacts only). It should be noted this project had fewer permanent impacts and analyzed indirect impacts while the SDG&E HCP does not.</p> <p>BWI P-1044 resulted in 0.09 ac direct temporary impacts (mitigated at 5:1) and 1.7ac of indirect temporary impacts (mitigated at 1:1), for 2.15ac restored and enhanced, and final costs per acre were approx. \$260k/ac (with no permanent impacts).</p> <p>A 2013 unauthorized bivouac on R505 at Camp Pendleton resulted in 1.2 ac direct temporary impacts which required 1:1 restoration with 50-ft buffer, for 2.2 ac total restoration which cost the Base \$321,000 = \$146k/ac of impact (no permanent impacts).</p> <p>Finally, the 51 Area Reservoir consultation identified 0.46 ac of direct permanent impacts, 1.18ac of direct temporary impacts (1.54 ac total direct impacts), and 10.41 ac of indirect temporary impacts from the project and past activities, requiring 1.18 ac of restoration and 20.94 ac of habitat enhancement for \$1mil. =</p>	

#	Page	Section/ Line	Reviewer	Comment	Response
				<p>\$83k/ac (all types).</p> <p>This project appears to have lower compensation requirements and has not analyzed for indirect temporary impacts (such as noise and vibration). It's understood that mitigation requirements would vary based on types and locations of impact, but some discussion is needed to justify these discrepancies.</p>	
2.	14-15, 52 55 60 63	Table 2-1 Estimated Impacts to Covered Species and Habitat Impacts to Covered Plants Impacts to Covered Amphibians and Reptiles Impacts to Covered Birds	Camp Pendleton	<p>EA acknowledges activities may introduce invasive plants, which can degrade habitat (see Estimated Impacts to Covered Species, Habitat, pg. 52 and Impacts to Covered Plants, pg. 55, Impacts to Covered Amphibians and Reptiles, pg. 60 Impacts to Covered Birds, pg. 63, etc.), but it is not clear if there is an Operational Procedure to minimize and prevent the introduction of invasive propagules in Table 2-1. Best Management Practices to control the spread of invasive plants and other species should be included in the Operational Protocols. This would involve cleaning equipment and vehicles between sites, as well as using weed free substrates. Please see the following resource: Prevention BMPs for Transportation and Utility Corridors – California Invasive Plant Council (https://www.cal-ipc.org/resources/library/publications/tuc/).</p>	
Appendix A: Covered Species Analysis (FWS-R8-ES-2022-0027-0003 attachment 1)					
3.				No Comment	
Appendix B: Eagle Conservation Plan (FWS-R8-ES-2022-0027-0003 attachment 2)					
4.				No Comment	
Appendix C: Bighorn Sheep Evaluation (FWS-R8-ES-2022-0027-0003 attachment 3)					
5.				No Comment	
Appendix D: Species Considered for Coverage (FWS-R8-ES-2022-0027-0003 attachment 4)					
6.				No Comment	

#	Page	Section/ Line	Reviewer	Comment	Response
Appendix E: SDG&E Vegetation Crosswalk (FWS-R8-ES-2022-0027-0003 attachment 5)					
7.				No Comment	
Appendix F: Habitat Type Crosswalk to Grouping in Tables 4.5 and 4.6 (FWS-R8-ES-2022-0027-0003 attachment 6)					
8.				No Comment	
Appendix G: Land Use Categories (FWS-R8-ES-2022-0027-0003 attachment 7)					
9.				No Comment	
Appendix H: Endangered Species Act Compliance Templates (FWS-R8-ES-2022-0027-0003 attachment 8)					
10.				No Comment	
SDG&E HCP Amendment 2022 (FWS-R8-ES-2022-0027-0003 _content)					
11.	ES-6 And p. 31	Exec. Sum. And Chapter 3 Sec. 3.1	David Boyer MCAS Miramar	<p>The executive summary (p. ES-6) is the only place in the draft HCP that says anything about coverage for the endangered Quino checkerspot butterfly. This one paragraph explanation of a separate Low Effect HCP (LEHCP) fails to explain its relationship to this HCP, or even refer to the nature of coverage and operational protocols provided separately in that specific LEHCP. Further, there is absolutely no mention of coverage for the QCB in the chapter 3 discussion of covered species. Something needs to be stated in section 3.1 to reference the LEHCP.</p> <p>More explanation and reference in the Executive Summary is warranted to explain to readers that coverage information and operational protocols for QCB exist, but are not in this HCP and must be referenced in a completely separate LEHCP document. Also recommend that something be said in section 3.1 about the QCB being covered separately in a species-specific LEHCP. Without this, reader likely will miss that the QCB is covered any anything. It may be wise to add it somehow to the tables and applicable appendix for this reason as well.</p>	
12.		Chapter 5 Section 5.1	David Boyer MCAS Miramar	This entire section lacks a general management protocol for surveillance and controlling invasive plant species throughout the plan area. With the continued, and increasing, presence of invasive weeds in many areas, including a more active program for weed surveillance and control along SDG&E facilities and access roads is warranted. This is needed to prevent colonization of such	

#	Page	Section/ Line	Reviewer	Comment	Response
				<p>sites from spreading a problem that can adversely affect sensitive habitat, associated species, and wildfire threat reduction.</p> <p>Many maintenance and construction actions are described with operational protocols that cause soil disturbance, but none include provisions for follow up weed control over the subsequent growing season. Such disturbances provide opportunities for establishment of invasive weeds and subsequent seed sources that can spread along corridors and into adjacent areas. Discussion of weeds often found in “Disturbed Sites” discussed in Chapter 4 of the HCP highlight this topic.</p> <p>Most protocols are silent about monitoring for and controlling weeds as a follow up to execution. Examples include: Maintenance, Repair, and Construction of Facilities (5.1.4) even though item 29 addresses erosion repair and revegetation; Road Maintenance (5.1.5); and New Access Roads (5.1.6).</p> <p>Invasive weed control is presented as a part of Restoration and Enhancement Programs (R/E Program) (5.2.2.6). However, these appear to be only applicable when mitigation is warranted and is done in lieu of using credits from the mitigation bank. Actions disturbing the soil that do not rise to the level of warranting compensatory mitigation do not seem to be included. Indeed, discussion of “Small Sites” and “Sites of Periodic Disturbance” (5.2.2.3) are described as generally not good candidates for the R/E Program. As such, invasive weed control does not seem to be proposed at such sites following soil disturbance.</p> <p>A habitat conservation plan in today’s circumstances cannot be fully successful if a more comprehensive approach to invasive weed control is not included. Recommend standing up a globally applied invasive weed control program as a means to address both site specific R/E Program actions and the myriad of other activities that cause soil disturbance. Control during the first growing season (=rainy season through the duration of subsequent soil moisture) following soil disturbances can be critical for preventing establishment that could become an</p>	

#	Page	Section/ Line	Reviewer	Comment	Response
				infestation. Continued surveillance of recent project disturbances could be very important to prevent spread beyond the original disturbance site.	



County of San Diego

PLANNING & DEVELOPMENT SERVICES
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DAHVIA LYNCH
DIRECTOR

September 9, 2022

Assistant Field Supervisor
Carlsbad Fish and Wildlife Office
U.S. Fish and Wildlife Service
2177 Salk Avenue, Suite 250
Carlsbad, CA 92008

Sent via email to: fw8cfwocomments@fws.gov

REQUEST FOR COMMENTS ON THE DRAFT HABITAT CONSERVATION PLAN AMENDMENT RELATED TO SAN DIEGO GAS & ELECTRIC'S (SDG&E) APPLICATION FOR AN INCIDENTAL TAKE PERMIT UNDER THE ENDANGERED SPECIES ACT

To Whom It May Concern,

The County of San Diego (County) staff reviewed the Draft Amendment for U.S. Fish and Wildlife Services' (USFWS) San Diego Gas & Electric Habitat Conservation Plan (Project), received on August 19, 2022.

County staff appreciates the opportunity to review the Project and offers the following comments for your consideration. Please note that none of these comments should be construed as County support for this Project.

GENERAL

1. The County's Land Use and Environment Group has developed Guidelines for Determining Significance that are used to determine the significance of environmental impacts and mitigation options for addressing potentially significant impacts in the unincorporated portions of the county. Project impacts that could have potentially significant adverse effects to the unincorporated county or County facilities should be evaluated using the County's Guidelines for Determining Significance. These guidelines are available online at: <http://www.sandiegocounty.gov/pds/procguid.html>.

BIOLOGY

1. The County's Guidelines for Determining Significance and Report Format and Content Requirements for Biological Resources (Biological Resource Guidelines) provides guidance for assessing impacts by proposed projects to sensitive species and habitats,

as well as standard mitigation measures and project design considerations. For low-level sensitive species (Group II), mitigation is generally achieved concurrently with habitat-based mitigation. For high-level sensitive species (Group I), the mitigation requirement is ratio based. Project impacts that could have potentially significant adverse effects to the unincorporated county or County facilities should be evaluated using the County's Guidelines for Determining Significance. These guidelines are available online at: https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/Biological_Guidelines.pdf.

2. The County's Resource Protection Ordinance (RPO) applies to projects that impact wetlands, floodplains, steep slopes, sensitive biological habitats, and prehistoric and historic sites to protect these sensitive lands and prevent their degradation or loss. The RPO regulates development of wetlands and sensitive habitat lands, including "land which supports unique vegetation communities, or the habitats of rare or endangered species or sub-species of animals or plants as defined by Section 15380 of the CEQA Guidelines (14 Cal. Admin. Code Section 15000 et seq.)." The RPO includes the provision that when "the extent of environmentally sensitive lands on a particular legal lot is such that no reasonable economic use of such lot would be permitted by these regulations, then an encroachment into such environmentally sensitive lands to the minimum extent necessary to provide for such reasonable use may be allowed." In all other instances where the RPO applies, activities damaging to sensitive lands are prohibited unless all feasible measures necessary to protect and preserve the sensitive lands are completed as a condition of Project approval, and mitigation provides an equal or greater benefit to the affected species. Project impacts that could have potentially significant adverse effects to sensitive lands within the unincorporated County or County facilities should be evaluated using the RPO. This ordinance is available online at: https://www.sandiegocounty.gov/content/dam/sdc/pds/docs/res_prot_ord.pdf.

MULTIPLE SPECIES CONSERVATION PROGRAM

1. The Project is located within portions of all three of the County's Multiple Species Conservation Program (MSCP) plan areas. This includes the South County Multiple Species Conservation Program Subarea Plan (South County Plan), the in process North County Multiple Species Conservation Plan (North County Plan), and future East County Multiple Species Conservation Plan (East County Plan). The Project could also potentially impact the habitat of species that may be covered by the in process Regional Butterflies Habitat Conservation Plan (HCP). Please see additional comments pertaining to each of the plans below.
2. The South County Plan is a joint federal HCP and state Natural Communities Conservation Plan (NCCP) that covers the southwestern portion of the unincorporated County. The County's Biological Mitigation Ordinance (BMO) is the primary implementing ordinance for the South County Plan. The BMO outlines the sensitive resources of concern and sets forth the criteria that all private and public projects must follow. The BMO includes specific project design criteria that must be incorporated into each project, such as protecting wildlife movement corridors and avoiding resources considered to be significant. The BMO also limits the amount of impacts that may occur to certain sensitive, rare, or endangered species and sets the minimum amount of mitigation that must be provided. Project impacts that could have potentially significant adverse effects to lands

within South County Plan should be evaluated using the BMO. This ordinance is available online at: [COUNTY OF SAN DIEGO \(sandiegocounty.gov\)](https://www.sandiegocounty.gov).

3. The County is working in partnership with the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) to prepare the North County Plan. The North County Plan will be a joint federal HCP and state NCCP that will cover the northern part of the unincorporated county. The portions of the Project are located within the draft North County Plan Area and portions may be located within the draft North County Plan Priority Conservation Area (PCA), the area within which the preserve will be assembled. Given the Project's location within and adjacent to the draft PCA, environmental documentation for the Project should address potential impacts to the County's draft North County Plan. Additional information regarding the North County Plan is available at: <https://www.sandiegocounty.gov/content/sdc/pds/mscp/nc.html>.
4. The Regional Butterflies HCP plan area has not yet been developed, but it will include the areas of the unincorporated County where the Covered Species or their habitat could occur. Five species could potentially be covered by the Regional Butterflies HCP, including the federally endangered Quino checkerspot butterfly and Laguna Mountains skipper, federally threatened Hermes copper butterfly, narrow endemic Harbison's dun skipper, and the federal candidate Monarch butterfly. The Project could potentially impact the habitat of species that may be covered by the Regional Butterflies HCP. Once the Regional Butterflies HCP is complete, project impacts that could have potentially significant adverse effects to species covered by the Regional Butterflies HCP should be evaluated using the future implementing ordinance. Additional information regarding the Regional Butterflies HCP is available at: <https://www.sandiegocounty.gov/content/sdc/pds/mscp/nc.html>.

DEPARTMENT OF PARKS AND RECREATION (DPR)

1. SDG&E transmission and distribution easements traverse a majority of County of San Diego Department of Parks and Recreation (DPR) properties. Coordination between SDG&E and County DPR is essential to reduce impacts to County DPR properties. Coordination includes but are not limited to the following SDG&E Covered Activities:
 - a. Please notify County DPR land managers prior to conducting any maintenance on County DPR preserves.
 - i. At a minimum, 72 hours but preferably 1 week prior to work starting. Include details regarding the scope of work, location(s) within the preserve, estimated date range, name of the subcontractor, easement, and SDG&E staff contact information in case questions or concerns arise.
 - b. Please consult with County DPR land managers prior to trimming or removing any trees outside of the SDG&E Right-of-Way that are deemed hazardous to their infrastructure.
 - i. At a minimum, 72 hours but preferably 1 week prior to work starting.
 - c. Please ensure that all vegetation trimmings are removed each day prior to vacating the preserve.

- d. Wherever gate access is shared between SDG&E, County DPR land managers, and other approved entities, SDG&E should maintain a system (e.g., daisy chain) that does not prevent access for the County DPR land manager and other entities. Communicate with the County DPR land manager about any issues with gate access.
 - e. Section 5.1.1, Smoking may not occur within County DPR preserves that prohibit smoking.
 - f. No driving in County DPR preserves for at least 5 days following significant rain (0.5 inch or more) or coordination with County DPR staff if there is an emergency related to access after a rain event.
 - g. Firearms are not permitted on County DPR preserves; SDG&E shall coordinate with County DPR if SDG&E security personnel must access County DPR property.
 - h. Spread of invasive plants is a significant regional issue that many land managers face throughout the San Diego region. Under Section 5.1, 5.1.4 Maintenance, Repair, and Construction of Facilities, please describe how SDG&E will ensure SDG&E vehicles will not carry invasive non- native plants between public and private properties.
 - i. Section 5.1, 5.1.5 Maintenance of Access Roads, please include coordination with County DPR regarding maintenance activities.
 - j. Section 5.1, 5.1.8, Survey Work, survey data collection should stay within SDG&E easements within Preserves.
 - k. Please provide Pre-Activity Survey Reports (biological and cultural resources) to County DPR before any work is performed on County DPR preserves.
 - l. Work related to Wildfire Fuels Management activities within County DPR preserves must be coordinated with County DPR.
 - m. In the instance where SDG&E does not hold an easement or existing right-of-entry (ROE) permit to access County DPR preserves to perform maintenance of existing facilities, a County DPR ROE permit will need to be obtained. The County DPR ROE permit application can be found at the following webpage, [Permits & Fees \(sdparks.org\)](https://sdparks.org). Please allow 4-6 weeks for processing of the ROE permit application.
2. Section 2.1.2 Electric Transmission Easement Corridors, please include an explanation of the instances of electric transmission easement corridors within preserves because width of easements varies considerably from one property to the next.

Also, access roads to these easements are not always maintained by SDG&E and are created when maintenance is required. The creation of access roads within County DPR preserves must be coordinated with County DPR.

3. Section 2.2.5 Vegetation Management, please include coordination with County DPR before work is performed in County DPR preserves.
4. Section 2.2.5.4 Wildfire Fuels Management, please define the distance outside of the existing SDG&E right-of-way that would be proposed for thinning on County DPR preserves.

Also, will SDG&E provide mitigation in the event host plant and nectar-source species for sensitive wildlife is impacted on County DPR preserves during wildfire fuels management activities?

5. Section 5.2.2, 5.2.2.2 Selecting a Site-Specific Approach, please include coordination with County DPR when proposing to perform restoration on County DPR preserves.
6. Section 5.3 SDG&E Access Road Removal within the Plan Area, please include coordination with County DPR when proposing to remove access roads on County DPR preserves.
7. Appendix A, Covered Species Analysis for the SDG&E Habitat Conservation Plan Amendment 2022, please confirm if SDG&E used County of San Diego SanBIOS GIS data to assist with development of the covered species analysis.

The County appreciates the opportunity to comment on this Project. We look forward to receiving future documents related to this Project and providing additional assistance, at your request. If you have any questions regarding these comments, please contact Timothy Vertino, Land Use / Environmental Planner, at (858) 505-6677, or via e-mail at timothy.vertino@sdcounty.ca.gov.

Sincerely,

Lynnette Tessitore

Lynnette Tessitore
Chief, Long Range Planning Division
Planning & Development Services

cc: Rosa Olascoaga, Policy Advisor, Board of Supervisors, District 1
David Flores, Policy Advisor, Board of Supervisors, District 1
Gregory Kazmer, Land Use Director, Board of Supervisors, District 2
Rebecca Smith, Policy Advisor, Board of Supervisors, District 3
Jeffrey Yuen, Policy Advisor, Board of Supervisors, District 3
Cody Petterson, Policy Advisor, Board of Supervisors, District 3
Emily Wier, Policy Advisor, Board of Supervisors, District 4
Joon Suh, Policy Advisor, Board of Supervisors, District 4
Hunter McDonald, Policy Advisor, Board of Supervisors, District 5
Marvin Mayorga, CAO Staff Officer, LUEG
Emmet Aquino, Park Project Manager, DPR
Autumn Viglione, Land Use/Environmental Planner, PDS

PUBLIC SUBMISSION

As of: September 12, 2022
Received: September 05, 2022
Status: Posted
Posted: September 06, 2022
Tracking No. I7o-o27d-66k7
Comments Due: September 09, 2022
Submission Type: Web

Docket: FWS-R8-ES-2022-0027

Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application; Proposed Habitat Conservation Plan Amendment and Associated Documents; County of San Diego, California

Comment On: FWS-R8-ES-2022-0027-0001

Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application; Proposed Habitat Conservation Plan Amendment and Associated Documents; County of San Diego, California

Document: FWS-R8-ES-2022-0027-0004

Comment from Anonymous

Submitter Information

Name: Anonymous Anonymous

General Comment

Please do your best to protect all the animals that will be affected by all this.

Commentor	Comment	Response
U.S. Forest Service	Dear Mr. Sobiech, Thank you for the opportunity to review the environmental documentation for the San Diego Gas and Electric Conservation Plan Amendment. The Forest has the following comments regarding Appendix A, Covered Species Analysis:	Thank you for your comments and participation in review of the project documents. These comments are specific to the Covered Species Analysis contained as Appendix A to the Habitat Conservation Plan (HCP) Amendment and do not provide comment on this Environmental Assessment (EA).
U.S. Forest Service	Section 3.3 - Laguna Mountains Skipper Page 97. Distribution, Abundance, and Trends – “The species was last seen in the Laguna Mountains in 1999 and is considered extirpated from that area (USFWS 2019b).” Page 99. Presence within Plan Area and PIZ – “, the only known population of this species is concentrated on Palomar Mountain”. Page 100. Potential Impacts, Effects on Population Viability and Species Recovery - PIZ does overlap “ “Although this species is extirpated from the Laguna Mountains, the PIZ does overlap with locations of historical records and it is possible the species could be reintroduced to these areas in the future.” Laguna Mountains Skipper was reintroduced to the Laguna Mountains in 2021.	Thank you for providing the current information regarding the Laguna Mountains skipper. The referenced text of the Covered Species analysis was written prior to the reintroduction of the species in 2021. The text in these locations has been updated to reflect the 2021 reintroduction of Laguna Mountains Skipper to the Laguna Mountains.
U.S. Forest Service	Section 3.4 - Hermes Copper Page 102 and 103. Distribution, Abundance, and Trends – “Relative to the Plan Area in San Diego County, extant populations are known to occur in Lopez Canyon, Mission Trails, Admiral Baker, Crestridge, Boulder Creek Road, South Guatay Mountain, Descanso, Japatul, Alpine, Loveland Reservoir, Hidden Glen, McGinty Mountain, Rancho San Diego, Sycuan Peak, Gaskill Peak, Lawson Valley, Hartley Peak, and Potrero (USFWS 2018, 2020a)” This list includes many locations that appear to be extirpated including Lopez Canyon, Mission Trails, Admiral Baker, Crestridge, South Guatay Mountain, Descanso, Japatul, Alpine, Loveland Reservoir, Hidden Glen, McGinty Mountain, Rancho San Diego, Sycuan Peak, Gaskill Peak, Lawson Valley, Hartley Peak, and omits some that are extant (Roberts Ranch, Bell Bluff).	Text in this section has been updated to state that while Hermes copper butterflies have not recently been observed at Lopez Canyon, Mission Trails, Admiral Baker, Crestridge, South Guatay Mountain, Descanso, Japatul, Alpine, Loveland Reservoir, Hidden Glen, McGinty Mountain, Rancho San Diego, Sycuan Peak, Gaskill Peak, Lawson Valley, and Hartley Peak, these locations may still be occupied; and to include Roberts Ranch and Bell Bluff.

Commentor	Comment	Response
U.S. Forest Service	<p>Page 110. Figure 3-2 Critical Habitat Invertebrates - Laguna Mt Skipper and Quino Checkerspot designated critical habitat is not shown on the map.</p>	<p>Laguna Mt Skipper designated critical habitat has been added the Figure 3-2.</p> <p>Quino checkerspot butterfly critical habitat is not shown on Figure 3-2 as it is not a Covered Species under the HCP Amendment. As described in the Executive Summary and new clarifying text added in Section 3.1 of the HCP Amendment, Quino checkerspot butterfly is not covered under the HCP Amendment because the Service previously issued SDG&E a permit for the Low-Effect Habitat Conservation Plan for the Quino checkerspot butterfly (SDG&E 2007) and no amendments to that plan or permit are proposed at this time.</p>
U.S. Forest Service	<p>Thank you for your consideration of these comments. If you have questions about this information, please contact Kirsten Winter, Forest Biologist at kirsten.winter@usda.gov</p> <p>Sincerely, SCOTT TANGENBERG Forest Supervisor</p>	<p>The Service will continue to communicate with the USFS as needed regarding implementation of the HCP Amendment on USFS lands.</p>

Commentor	Comment	Response
<p>Dept of Defense - Camp Pendleton</p>	<p>PPM mitigation doesn't seem commensurate to similar work being done on Camp Pendleton. \$150,000 is proposed to compensate for 1.5ac direct permanent impacts and 0.87 ac direct temporary impacts to PPM habitat (Table 3-7) = \$100k/ac of impact (all impact types).</p> <p>The 2021 SCE Right-of-Way Maintenance BO (FWS-MCBCP-11B0365-21F0) identifies \$680,211 to compensate for 0.24 direct permanent impacts, 1.06 direct temporary impacts, and 4.17 indirect temporary impacts = \$124k/ac of impact (all impact types) or \$523k/ac (direct impacts only). It should be noted this project had fewer permanent impacts and analyzed indirect impacts while the SDG&E HCP does not.</p> <p>BWI P-1044 resulted in 0.09 ac direct temporary impacts (mitigated at 5:1) and 1.7ac of indirect temporary impacts (mitigated at 1:1), for 2.15ac restored and enhanced, and final costs per acre were approx. \$260k/ac (with no permanent impacts).</p> <p>A 2013 unauthorized bivouac on R505 at Camp Pendleton resulted in 1.2 ac direct temporary impacts which required 1:1 restoration with 50-ft buffer, for 2.2 ac total restoration which cost the Base \$321,000 = \$146k/ac of impact (no permanent impacts).</p> <p>Finally, the 51 Area Reservoir consultation identified 0.46 ac of direct permanent impacts, 1.18ac of direct temporary impacts (1.54 ac total direct impacts), and 10.41 ac of indirect temporary impacts from the project and past activities, requiring 1.18 ac of restoration and 20.94 ac of habitat enhancement for \$1mil. = \$83k/ac (all types).</p> <p>This project appears to have lower compensation requirements and has not analyzed for indirect temporary impacts (such as noise and vibration). It's understood that mitigation requirements would vary based on types and locations of impact, but some discussion is needed to justify these discrepancies.</p>	<p>Thank you providing information on different mitigation costs for various impacts on Marine Corps Base Camp Pendleton (MCBCP). The Service recognizes that mitigation costs may vary depending on a number of factors, including, for example, location, types of impacts, and resources.</p> <p>The in-lieu fee for PPM was revisited and additional analysis was conducted to estimate the fee amount. A new Section (Section 5.5.6) has been added to the HCP Amendment to discuss PPM mitigation and the fee has been increased to \$592,950. With the additional funding identified in the HCP Amendment, the amount of funding and associated benefits to PPM will be similar to that provided pursuant to the SCE Right of Way Maintenance BO and address a similar set of activities and anticipated impacts.</p> <p>The revisions to the fee analysis presented in the HCP Amendment do not modify the environmental analysis provided in this EA.</p>

Commentor	Comment	Response
<p>Dept of Defense - Camp Pendleton</p>	<p>EA acknowledges activities may introduce invasive plants, which can degrade habitat (see Estimated Impacts to Covered Species, Habitat, pg. 52 and Impacts to Covered Plants, pg. 55, Impacts to Covered Amphibians and Reptiles, pg. 60 Impacts to Covered Birds, pg. 63, etc.), but it is not clear if there is an Operational Procedure to minimize and prevent the introduction of invasive propagules in Table 2-1. Best Management Practices to control the spread of invasive plants and other species should be included in the Operational Protocols. This would involve cleaning equipment and vehicles between sites, as well as using weed free substrates. Please see the following resource: Prevention BMPs for Transportation and Utility Corridors – California Invasive Plant Council (https://www.cal-ipc.org/resources/library/publications/tuc/).</p>	<p>The Service concurs and worked with SDG&E to add the following language to Operational Protocol 11 (HCP Amendment, Section 5.1.1), to help avoid and minimize the introduction of invasive plant species during Covered Activities:</p> <p>“Field crews will coordinate with the Biologist to implement preventative invasive weed control BMPs when requested by the land manager, where feasible and practicable to minimize the spread of invasive weed species. BMPs may include practices such as vehicle washing, use of weed free substrates, educating staff and contractors on protocols like washing/brushing boots between sites, and removing weed biomass from sites during weed control activities.”</p> <p>Additionally, the following new Operational Protocol 26 was added to the HCP Amendment that addresses the use of exotic plant species:</p> <p>“Landscaping for new Facilities within 300 feet of native habitat shall not include exotic plant species that are listed on Cal-IPC’s “Invasive Plant Inventory” list. This list includes such species as pepper tree (<i>Schinus molle</i>), pampas grass (<i>Cortaderia selloana</i>), fountain grass (<i>Pennisetum setaceum</i>), iceplant (<i>Carpobrotus edulis</i>), myoporum (<i>Myoporum laetum</i>), black locust (<i>Robinia pseudoacacia</i>), capeweed (<i>Arctotheca calendula</i>), tree-of-heaven (<i>Ailanthus altissima</i>), periwinkle (<i>Vinca major</i>), sweet alyssum (<i>Lobularia maritima</i>), English ivy (<i>Hedera helix</i>), French broom (<i>Genista monspessulana</i>), Scotch broom (<i>Cytisus scoparius</i>), and Spanish broom (<i>Spartium junceum</i>). A copy of the complete list can be obtained from Cal-IPC’s website at http://www.cal-ipc.org. In addition, landscaping plans should encourage the adoption of drought-tolerant plants and native vegetation appropriate to the adjacent habitat and should discourage the use of plants that require intensive irrigation, fertilizers, or pesticides adjacent to native habitat. Water runoff from landscaped areas should be directed away from native habitats and contained and/or treated within the development footprint...”</p> <p>These revisions are reflected in Table 2-1 of the EA.</p>

Commentor	Comment	Response
Dept of Defense – MCAS Miramar	<p>The executive summary (p. ES-6) is the only place in the draft HCP that says anything about coverage for the endangered Quino checkerspot butterfly. This one paragraph explanation of a separate Low Effect HCP (LEHCP) fails to explain its relationship to this HCP, or even refer to the nature of coverage and operational protocols provided separately in that specific LEHCP.</p> <p>Further, there is absolutely no mention of coverage for the QCB in the chapter 3 discussion of covered species. Something needs to be stated in section 3.1 to reference the LEHCP.</p> <p>More explanation and reference in the Executive Summary is warranted to explain to readers that coverage information and operational protocols for QCB exist, but are not in this HCP and must be referenced in a completely separate LEHCP document. Also recommend that something be said in section 3.1 about the QCB being covered separately in a species-specific LEHCP. Without this, reader likely will miss that the QCB is covered any anything. It may be wise to add it somehow to the tables and applicable appendix for this reason as well.</p>	<p>Per the comment, additional discussion of the existing Quino LEHCP and those measures to specifically protect Quino checkerspot butterfly was added to the HCP Amendment Executive Summary. Additional references to clarify that the HCP Amendment does not address Quino checkerspot butterfly because it is covered under a separate LEHCP has been added to the HCP Amendment in the Executive Summary, Section 3.1, and Table 3-1. Similar text was also added in the Covered Species Analysis (Appendix A to the HCP Amendment) in Section 1.3.1 and Section 3.0.</p>

Commentor	Comment	Response
<p>Dept of Defense – MCAS Miramar</p>	<p>This entire section lacks a general management protocol for surveillance and controlling invasive plant species throughout the plan area. With the continued, and increasing, presence of invasive weeds in many areas, including a more active program for weed surveillance and control along SDG&E facilities and access roads is warranted. This is needed to prevent colonization of such sites from spreading a problem that can adversely affect sensitive habitat, associated species, and wildfire threat reduction.</p> <p>Many maintenance and construction actions are described with operational protocols that cause soil disturbance, but none include provisions for follow up weed control over the subsequent growing season. Such disturbances provide opportunities for establishment of invasive weeds and subsequent seed sources that can spread along corridors and into adjacent areas. Discussion of weeds often found in “Disturbed Sites” discussed in Chapter 4 of the HCP highlight this topic.</p> <p>Most protocols are silent about monitoring for and controlling weeds as a follow up to execution. Examples include: Maintenance, Repair, and Construction of Facilities (5.1.4) even though item 29 addresses erosion repair and revegetation; Road Maintenance (5.1.5); and New Access Roads (5.1.6).</p> <p>Invasive weed control is presented as a part of Restoration and Enhancement Programs (R/E Program) (5.2.2.6). However, these appear to be only applicable when mitigation is warranted and is done in lieu of using credits from the mitigation bank. Actions disturbing the soil that do not rise to the level of warranting compensatory mitigation do not seem to be included. Indeed, discussion of “Small Sites” and “Sites of Periodic Disturbance” (5.2.2.3) are described as generally not good candidates for the R/E Program. As such, invasive weed control does not seem to be proposed at such sites following soil disturbance</p> <p>A habitat conservation plan in today’s circumstances cannot be fully successful if a more comprehensive approach to invasive weed control is not included. Recommend standing up a globally applied invasive weed control program as a means to address both site specific R/E Program actions and the myriad of other activities that cause soil disturbance. Control during the first growing season (=rainy season through the duration of subsequent soil moisture) following soil disturbances can be critical for preventing establishment that could become an infestation. Continued surveillance of recent project disturbances could be very important to prevent spread beyond the original disturbance site.</p>	<p>As discussed above, the Service concurs with the importance of invasive plant species control. Language was added to Operational Protocol 11 (HCP Amendment Section 5.1.1) to further minimize the introduction of invasive plant species during Covered Activities. Additionally, Operational Protocol 26 was added to the HCP Amendment that addresses the use of exotic plant species in landscaping.</p> <p>SDG&E Covered Activities are typically conducted within or immediately adjacent to existing SDG&E rights-of-way. In many cases, SDG&E is neither the landowner nor land manager of the property where Covered Activities occur, which would make surveillance and controlling invasive plant species throughout the Plan Area difficult. However, many of SDG&E rights-of-way run through Preserves or Proposed Preserves where invasives are being monitored/managed and Section 5.2.2.2 of the HCP Amendment has been amended to include eradicating invasive weed species populations in particular locations for selecting enhancement sites. Further, Section 5.2.2.3 has been amended to state that small sites or those subject to periodic disturbance not included in the R/E program may be planted or seeded with native hydroseed mix especially to help prevent the introduction and spread of invasive weed species in areas of high quality native habitat; and that the potential for introduction and spread of invasive weed species will be considered for site selection, especially for temporary impacts in high quality native habitat.</p> <p>In addition, Wildfire Fuels Management will focus on removing nonnative species, which can counter act the potential spread of such species along utility corridors and benefit the overall ecological value of the surrounding vegetation communities.</p>

Commentor	Comment	Response
County of San Diego	<p>To Whom It May Concern,</p> <p>The County of San Diego (County) staff reviewed the Draft Amendment for U.S. Fish and Wildlife Services' (USFWS) San Diego Gas & Electric Habitat Conservation Plan (Project), received on August 19, 2022.</p> <p>County staff appreciates the opportunity to review the Project and offers the following comments for your consideration. Please note that none of these comments should be construed as County support for this Project.</p>	<p>Thank you for your comments and participation in review of the project documents. It is noted that these comments do not represent the County's support or opposition of the project.</p>

<p>County of San Diego</p>	<p>GENERAL</p> <p>1. The County's Land Use and Environment Group has developed Guidelines for Determining Significance that are used to determine the significance of environmental impacts and mitigation options for addressing potentially significant impacts in the unincorporated portions of the county. Project impacts that could have potentially significant adverse effects to the unincorporated county or County facilities should be evaluated using the County's Guidelines for Determining Significance. These guidelines are available online at: http://www.sandiegocounty.gov/pds/procguid.html.</p>	<p>The EA analyzes the impacts resulting from the Service issuing an ITP for Covered Activities in the HCP Amendment pursuant to the National Environmental Policy Act (NEPA). NEPA provides an interdisciplinary framework for federal agencies to evaluate environmental consequences of programs and projects over which they have discretionary authority. As stated in Section 3.1.2 of the HCP Amendment, there may be other permitting requirements for Covered Activities and is not authorizing the individual activities carried out by SDG&E under this ITP. Rather, in issuing the ITP, the Service would be authorizing incidental take resulting from those Covered Activities performed in compliance with the HCP Amendment.</p> <p>As noted in the Introduction section of Chapter 1 of HCP Amendment, many Covered Activities do not require any discretionary approval by local governments. SDG&E is regulated by the California Public Utilities Commission (CPUC), which exercises exclusive jurisdiction over all investor-owned utility companies in California, and as such, County guidelines for determining significance of environmental effects from Covered Activities may be inapplicable.</p> <p>As stated in Section 1.4.2 of the HCP Amendment, SDG&E's Covered Activities, the regulation of such Covered Activities, and its HCP Amendment are distinguishable from entities whose actions fall within the jurisdiction of a particular local government. Accordingly, the HCP Amendment would function independently of regional conservation programs of local governments, which may also cover any part of the Plan Area.</p> <p>However, as with the existing Subregional Plan, the HCP Amendment remains designed to be consistent with the local habitat conservation plans and the overall preserve planning effort. Implementation of the HCP Amendment would not modify any applicable existing easement terms and conditions that SDG&E and the County may have in place for Covered Activities on County lands. In addition, the HCP Amendment does not impact SDG&E's coordination with the County regarding Covered Activities on County lands and the regulations and requirements that may apply, such as the County's Guidelines for Determining Significance.</p>
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Commentor	Comment	Response
County of San Diego	<p>BIOLOGY</p> <p>1. The County's Guidelines for Determining Significance and Report Format and Content Requirements for Biological Resources (Biological Resource Guidelines) provides guidance for assessing impacts by proposed projects to sensitive species and habitats, as well as standard mitigation measures and project design considerations. For low-level sensitive species (Group II), mitigation is generally achieved concurrently with habitat-based mitigation. For high-level sensitive species (Group I), the mitigation requirement is ratio based. Project impacts that could have potentially significant adverse effects to the unincorporated county or County facilities should be evaluated using the County's Guidelines for Determining Significance. These guidelines are available online at: https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/Biological_Guidelines.pdf.</p>	See response to County of San Diego General Comment 1 above.
County of San Diego	<p>2. The County's Resource Protection Ordinance (RPO) applies to projects that impact wetlands, floodplains, steep slopes, sensitive biological habitats, and prehistoric and historic sites to protect these sensitive lands and prevent their degradation or loss. The RPO regulates development of wetlands and sensitive habitat lands, including "land which supports unique vegetation communities, or the habitats of rare or endangered species or sub-species of animals or plants as defined by Section 15380 of the CEQA Guidelines (14 Cal. Admin. Code Section 15000 et seq.)." The RPO includes the provision that when "the extent of environmentally sensitive lands on a particular legal lot is such that no reasonable economic use of such lot would be permitted by these regulations, then an encroachment into such environmentally sensitive lands to the minimum extent necessary to provide for such reasonable use may be allowed." In all other instances where the RPO applies, activities damaging to sensitive lands are prohibited unless all feasible measures necessary to protect and preserve the sensitive lands are completed as a condition of Project approval, and mitigation provides an equal or greater benefit to the affected species. Project impacts that could have potentially significant adverse effects to sensitive lands within the unincorporated County or County facilities should be evaluated using the RPO. This ordinance is available online at: https://www.sandiegocounty.gov/content/dam/sdc/pds/docs/res_prot_ord.pdf.</p>	See response to County of San Diego General Comment 1 above.

Commentor	Comment	Response
County of San Diego	<p>MULTIPLE SPECIES CONSERVATION PROGRAM</p> <p>1. The Project is located within portions of all three of the County's Multiple Species Conservation Program (MSCP) plan areas. This includes the South County Multiple Species Conservation Program Subarea Plan (South County Plan), the in process North County Multiple Species Conservation Plan (North County Plan), and future East County Multiple Species Conservation Plan (East County Plan). The Project could also potentially impact the habitat of species that may be covered by the in process Regional Butterflies Habitat Conservation Plan (HCP). Please see additional comments pertaining to each of the plans below.</p>	See response to County of San Diego General Comment 1 above.
County of San Diego	<p>2. The South County Plan is a joint federal HCP and state Natural Communities Conservation Plan (NCCP) that covers the southwestern portion of the unincorporated County. The County's Biological Mitigation Ordinance (BMO) is the primary implementing ordinance for the South County Plan. The BMO outlines the sensitive resources of concern and sets forth the criteria that all private and public projects must follow. The BMO includes specific project design criteria that must be incorporated into each project, such as protecting wildlife movement corridors and avoiding resources considered to be significant. The BMO also limits the amount of impacts that may occur to certain sensitive, rare, or endangered species and sets the minimum amount of mitigation that must be provided. Project impacts that could have potentially significant adverse effects to lands within South County Plan should be evaluated using the BMO. This ordinance is available online at: COUNTY OF SAN DIEGO (sandiegocounty.gov).</p>	See response to County of San Diego General Comment 1 above.
County of San Diego	<p>3. The County is working in partnership with the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) to prepare the North County Plan. The North County Plan will be a joint federal HCP and state NCCP that will cover the northern part of the unincorporated county. The portions of the Project are located within the draft North County Plan Area and portions may be located within the draft North County Plan Priority Conservation Area (PCA), the area within which the preserve will be assembled. Given the Project's location within and adjacent to the draft PCA, environmental documentation for the Project should address potential impacts to the County's draft North County Plan. Additional information regarding the North County Plan is available at: https://www.sandiegocounty.gov/content/sdc/pds/mscp/nc.html.</p>	See response to County of San Diego General Comment 1 above.

Commentor	Comment	Response
County of San Diego	<p>4. The Regional Butterflies HCP plan area has not yet been developed, but it will include the areas of the unincorporated County where the Covered Species or their habitat could occur. Five species could potentially be covered by the Regional Butterflies HCP, including the federally endangered Quino checkerspot butterfly and Laguna Mountains skipper, federally threatened Hermes copper butterfly, narrow endemic Harbison's dun skipper, and the federal candidate Monarch butterfly. The Project could potentially impact the habitat of species that may be covered by the Regional Butterflies HCP. Once the Regional Butterflies HCP is complete, project impacts that could have potentially significant adverse effects to species covered by the Regional Butterflies HCP should be evaluated using the future implementing ordinance. Additional information regarding the Regional Butterflies HCP is available at: https://www.sandiegocounty.gov/content/sdc/pds/mscp/nc.html.</p>	<p>See response to County of San Diego General Comment 1 above.</p> <p>The HCP Amendment provides specific operational protocols for the protection of Laguna Mountains skipper and Hermes copper butterfly. SDG&E also currently operates under their Quino LEHCP (SDG&E 2007), which provides protection for Quino checkerspot butterfly.</p>

<p>County of San Diego</p>	<p>DEPARTMENT OF PARKS AND RECREATION (DPR)</p> <p>1. SDG&E transmission and distribution easements traverse a majority of County of San Diego Department of Parks and Recreation (DPR) properties. Coordination between SDG&E and County DPR is essential to reduce impacts to County DPR properties. Coordination includes but are not limited to the following SDG&E Covered Activities:</p> <ul style="list-style-type: none"> a. Please notify County DPR land managers prior to conducting any maintenance on County DPR preserves. <ul style="list-style-type: none"> i. At a minimum, 72 hours but preferably 1 week prior to work starting. Include details regarding the scope of work, location(s) within the preserve, estimated date range, name of the subcontractor, easement, and SDG&E staff contact information in case questions or concerns arise. b. Please consult with County DPR land managers prior to trimming or removing any trees outside of the SDG&E Right-of-Way that are deemed hazardous to their infrastructure. <ul style="list-style-type: none"> i. At a minimum, 72 hours but preferably 1 week prior to work starting. c. Please ensure that all vegetation trimmings are removed each day prior to vacating the preserve. d. Wherever gate access is shared between SDG&E, County DPR land managers, and other approved entities, SDG&E should maintain a system (e.g., daisy chain) that does not prevent access for the County DPR land manager and other entities. Communicate with the County DPR land manager about any issues with gate access. e. Section 5.1.1, Smoking may not occur within County DPR preserves that prohibit smoking. f. No driving in County DPR preserves for at least 5 days following significant rain (0.5 inch or more) or coordination with County DPR staff if there is an emergency related to access after a rain event. g. Firearms are not permitted on County DPR preserves; SDG&E shall coordinate with County DPR if SDG&E security personnel must access County DPR property. h. Spread of invasive plants is a significant regional issue that many land managers face throughout the San Diego region. Under Section 5.1, 5.1.4 Maintenance, Repair, and Construction of Facilities, please describe how SDG&E will ensure SDG&E vehicles will not carry invasive non- native plants between public and private properties. i. Section 5.1, 5.1.5 Maintenance of Access Roads, please include coordination with County DPR regarding maintenance activities. 	<p>The HCP Amendment covers an extensive area with many different, jurisdictions, landowners, and land managers. For this reason, specific requirements of the various landowners were not specifically detailed within the HCP Amendment. The HCP Amendment will not effect, alter, or impair any coordination SDG&E would conduct with County DPR for performing Covered Activities on preserve land and would continue to adhere to existing easement terms and conditions (e.g., prior notification, right of entry permits, etc.), as applicable.</p>
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Commentor	Comment	Response
	<p>j. Section 5.1, 5.1.8, Survey Work, survey data collection should stay within SDG&E easements within Preserves.</p> <p>k. Please provide Pre-Activity Survey Reports (biological and cultural resources) to County DPR before any work is performed on County DPR preserves.</p> <p>l. Work related to Wildfire Fuels Management activities within County DPR preserves must be coordinated with County DPR. In the instance where SDG&E does not hold an easement or existing right-of-entry (ROE) permit to access County DPR preserves to perform maintenance of existing facilities, a County DPR ROE permit will need to be obtained. The County DPR ROE permit application can be found at the following webpage, Permits & Fees (sdparks.org). Please allow 4-6 weeks for processing of the ROE permit application.</p>	
County of San Diego	2. Section 2.1.2 Electric Transmission Easement Corridors, please include an explanation of the instances of electric transmission easement corridors within preserves because width of easements varies considerably from one property to the next. Also, access roads to these easements are not always maintained by SDG&E and are created when maintenance is required. The creation of access roads within County DPR preserves must be coordinated with County DPR.	Easement corridors vary in width for a range of reasons, including but not limited to height of lines, number of lines, access limitations, vegetation type, property owner requirements at the time of acquisition, etc. The HCP Amendment will not effect, alter, or impair any coordination SDG&E would conduct with County DPR if/when Covered Activities are proposed on County DPR preserves, including creation and/or maintenance of access roads within SDG&E easements. In addition, Section 5.4 of the HCP Amendment limits new construction activities in preserves and requires coordination with the preserve managers.
County of San Diego	3. Section 2.2.5 Vegetation Management, please include coordination with County DPR before work is performed in County DPR preserves.	The HCP Amendment will not effect, alter, or impair any coordination SDG&E would conduct with County DPR if/when Covered Activities are proposed on County DPR preserves, including vegetation management.

Commentor	Comment	Response
County of San Diego	4. Section 2.2.5.4 Wildfire Fuels Management, please define the distance outside of the existing SDG&E right-of way that would be proposed for thinning on County DPR preserves. Also, will SDG&E provide mitigation in the event host plant and nectar-source species for sensitive wildlife is impacted on County DPR preserves during wildfire fuels management activities?	Landowner participation in the Wildfire Fuels Management program is voluntary. Accordingly, SDG&E would communicate with the County DPR to obtain permission from the County if Wildfire Fuels Management were proposed on County preserve land. As explained in the HCP Amendment, Wildfire Fuels Management focuses on removing nonnative species and dead/down woody vegetation that provides fuel for wildfire. Any thinning of select native vegetation would focus on preserving habitat value and native species diversity, thereby resembling an early successional state of the vegetation community that maintains biodiversity and ecological functionality. If a landowner granted permission to SDG&E to conduct Wildfire Fuels Management, vegetation thinning typically occurs within a 50-foot radius around infrastructure (e.g., distribution poles), with a focus on removing nonnatives and fuels, as well as thinning of native shrub and chaparral canopy species. SDG&E must mitigate net impacts to the native canopy that occur from Wildfire Fuels Management activities at a 1:1 ratio (see HCP Amendment Section 5.5.1.2).
County of San Diego	5. Section 5.2.2, 5.2.2.2 Selecting a Site-Specific Approach, please include coordination with County DPR when proposing to perform restoration on County DPR preserves.	The HCP Amendment will not effect, alter, or impair any coordination SDG&E would conduct with County DPR for Covered Activities performed on County DPR preserves, including habitat restoration.
County of San Diego	6. Section 5.3 SDG&E Access Road Removal within the Plan Area, please include coordination with County DPR when proposing to remove access roads on County DPR preserves.	The HCP Amendment will not effect, alter, or impair any coordination SDG&E would conduct with County DPR for Covered Activities performed on County DPR preserves, including road removal.

Commentor	Comment	Response
County of San Diego	7. Appendix A, Covered Species Analysis for the SDG&E Habitat Conservation Plan Amendment 2022, please confirm if SDG&E used County of San Diego SanBIOS GIS data to assist with development of the covered species analysis.	<p>The County of San Diego SanBIOS GIS Data was not one of the sources included as one of the GIS mapping layers in the Covered Species Analysis. The following sources were used to obtain information on Covered Species known to occur in the Plan Area:</p> <ul style="list-style-type: none"> • CNDDDB • USFWS regional databases • San Diego Management and Monitoring Program (SDMMP) • California Native Plant Society, Calflora, Consortium of California Herbaria, and Jepson Flora Project online database • eBird and iNaturalist databases • Existing Natural Community Conservation Plans (NCCPs) and Habitat Conservation Plans in the Plan Area • Information available in published literature and reports
County of San Diego	<p>The County appreciates the opportunity to comment on this Project. We look forward to receiving future documents related to this Project and providing additional assistance, at your request. If you have any questions regarding these comments, please contact Timothy Vertino, Land Use/Environmental Planner, at (858) 505-6677, or via e-mail at timothy.vertino@sdcounty.ca.gov.</p> <p>Sincerely, Lynnette Tessitore Chief, Long Range Planning Division Planning & Development Services</p>	<p>The Service appreciates the County's attention to this conservation effort and will continue to communicate with County of San Diego staff as needed.</p>

Commentor	Comment	Response
Anonymous	Please do your best to protect all the animals that will be affected by all this.	<p>Thank you for your participation in review of the proposed HCP Amendment. Because SDG&E's major infrastructure is now largely in place, and SDG&E anticipates building new Facilities at a far lower rate than prior decades, most impacts associated with the HCP Amendment are expected to be from Operation and Maintenance of existing Facilities. Most of these impacts are expected to be relatively small and distributed across a broad landscape and primarily occur within areas that have been previously disturbed and will not result in new developed areas. In addition, not all impacts are anticipated to be permanent, and temporary impact areas that are restored will continue to provide habitat to meet covered species' long-term needs. No large-scale New Construction is expected, and New Construction projects that impact most Covered Species and more the 1.75 acres of a Preserve or Proposed Preserve will only be covered if the requirements of a Minor Amendment are met, at which time potential impacts will be evaluated for consistency with the HCP Amendment.</p> <p>Wildfire prevention activities, including Wildfire Fuels Management, under the HCP Amendment are also expected to benefit Covered Species and their habitats by helping to prevent large scale and frequent fires.</p> <p>The HCP Amendment also includes extensive vernal pool, and species-specific Operational Protocols designed to avoid, minimize, and mitigate potential impacts to animal Covered Species and their habitats to help ensure their long-term conservation in the Plan Area. All of the above will also help protect non-covered animal species and their habitats.</p>