

Comment Set G0014, cont.  
California Botanical Habitat

Sunrise A.06-08-010

G0014-15

**A0028**

OFFICE OF  
**THE CITY ATTORNEY**  
CITY OF SAN DIEGO  
  
**MICHAEL J. AGUIRRE**  
CITY ATTORNEY

CIVIL DIVISION  
1200 THIRD AVENUE, SUITE 1620  
SAN DIEGO, CALIFORNIA 92101-4178  
TELEPHONE (619) 236-6220  
FAX (619) 236-7215

April 11, 2008

CPUC/BLM  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94104

Re: Draft EIR/EIS for Sunrise Powerlink Project  
CPUC Case No. 06-08-010

To Whom it May Concern:

Having reviewed the referenced Draft Environmental Impact Report/Environmental Impact Statement [DEIR], I must express my concerns about San Diego Gas & Electric's [SDG&E's] proposed Sunrise Powerlink Project [Project]. As a general matter, the Project's significant environmental impacts do not appear, from the DEIR, to be either susceptible to adequate mitigation or justifiable by overriding considerations. Further, the DEIR has failed to consider all necessary aspects of the Project, in that impermissible piecemealing is evident. Based upon substantial evidence in the DEIR's administrative record, including these comments, it is evident a fair argument can be and has been made that significant impacts may occur that have not yet been adequately evaluated. As a consequence, the DEIR, including the scope of the proposed project, other project alternatives and mitigation, should be amended and recirculated to reflect additional analysis and evidence. See CEQA Guidelines §§15065 and 15088.5.

**I. The DEIR Suggests that a Statement of Overriding Considerations Cannot be Supported.**

A fundamental tenet of environmental law in California, under the California Environmental Quality Act [CEQA], is that where a proposed project would have significant adverse environmental consequences that could not be mitigated, it may only be approved if, with respect to *each such effect*, the record contains substantial evidence to support a finding that "specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment." CEQA, §21081(b); *see also* CEQA Guidelines, §§15091(b) and 15093; *Village Laguna of Laguna Beach, Inc. v. Board of Supervisors* (1982) 134 Cal. App. 3d 1022 (finding must be stated and supported by substantial evidence, and accompanied by an explanation of how the evidence supports the finding).

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Thus, the CPUC is required to trace the "analytic route" from raw evidence to its conclusions. 11 Cal. 3d at 515, 113 Cal.Rptr. at 841. As highlighted by the California Supreme Court, these findings requirements will mean the lead agency will "draw legally relevant subconclusions supportive of its ultimate decision" that would "facilitate orderly analysis and minimize the likelihood that the agency will randomly leap from evidence to conclusions." 11 Cal. 3d at 516. Findings cannot simply contain bare conclusions. See CEQA Guideline Section 15091. *Rio Vista Farm Bureau Ctr. v. County of Solano* (1992) 5 Cal. App. 4th 351, 373; *Sacramento Old City Ass'n v. City Council* (1991) 229 Cal. App. 3d 1011, 1034; *Resource Defense Fund v. LAFCO* (1987) 191 Cal. App. 3d 886; *Citizens for Quality Growth v. City of Mt. Shasta* (1988) 198 Cal. App. 3d 433, 440; *Village Laguna of Laguna Beach, Inc. v. Board of Supervisors* (1982) 134 Cal.App. 3d 1022, 185 Cal.Rptr. 41. Findings can be supported by and incorporate by reference those facts found in the EIR or other documents in the record. However, this assumes that such facts exist in the record. Explicit written findings on an issue may be required when the record does not actually show the reason for the lead agency's action. See *Resource Defense Fund v. LAFCO* (1987) 191 Cal.App.3d 886, 236 Cal.Rptr. 794. See *CEB's Practice Under the California Environmental Quality Act*, V. 1, Ch. 17, Sections 17.22-17.28 (Rev. Nov. 2005).

At page ES-4 of the Executive Summary, the DEIR states that the Project would give rise to "50 significant, unmitigatable impacts." Most troubling among these, as stated at page ES-25, "because total construction GHG [greenhouse gas] emissions exceed the GHG reductions achieved due to avoided power plant emissions over 40 years of transmission line operation, the Proposed Project would cause an overall net increase in GHG emissions and a significant climate change impact." For a Project that has been sold to the public by the proponent as necessary to increase our reliance on renewable energy sources that reduce GHG emissions, this is a devastating conclusion. It calls into grave question the Project's environmental value, even if one assumes that the Project will lead to greatly increased use of renewable generation sources.

I see nothing in the DEIR that would suggest that overriding considerations would, or could, support approval of the Project despite this serious environmental harm, to say nothing of dozens of others. Indeed, the importance of this effect is underscored by the fact that California law, the Global Warming Solutions Act, AB 32, commits the state to a goal of an 80% reduction in GHG emissions by 2050 – exactly corresponding to the life of the proposed Project. It is difficult to imagine overriding considerations so powerful that they could justify knowingly moving California farther from this legislatively mandated goal. Certainly the DEIR reveals none. Unless such facts emerge in a manner that is not apparent in the DEIR, the law would potentially preclude Project approval as currently proposed.

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**II. The DEIR Ignores an Obvious Foreseeable Expansion of the Project, Resulting in Unlawful "Piecemealing."**

It is fundamental law under CEQA that environmental analysis must consider not only the proposed Project as identified by its proponent, but also the "whole of the action" including any "future expansion" that is "a reasonably foreseeable consequence of the initial project" that will "likely change the scope or nature of the initial project or its environmental effects." *Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal. 3d 376, and *McQueen v. Board of Directors of the Mid-peninsula Regional Open Space District* (6<sup>th</sup> Dist. 1988) 202 Cal. App. 3d 1136, 1143; *see also* Remy & Thomas' *Guide to CEQA* (11<sup>th</sup> Ed. 2007) at 92-93; *and see* CEQA § 21065 and CEQA Guidelines §15378.

The proponent's application expressly states an intention that the Project will lead to a 500 kV "Full Loop" into Southern California Edison territory. See SDG&E August 4, 2006 Application, p. VI-4 ("The Full Loop would complete the 500kv loop through Southern California, connecting SCE's 500kV Palo Verde-Devers-Valley-Serrano system to SWPL.") As witness Bill Powers has observed in his Phase II testimony, "the Full Loop described by SDG&E is missing one piece, an interconnection between the Sunrise Powerlink's Central substation near Lake Henshaw and the LEAPS 500 kV substation on Camp Pendleton's northern boundary." Bill Powers, March 12, 2008 Phase II Testimony for Powers Engineering, p. 15. Given that the Full Loop is a stated intention of the Project's proponent, it can hardly be doubted that the interconnection that Mr. Powers describes is a "reasonably foreseeable" future expansion of the Project. The DEIR acknowledges the foreseeability of this expansion at page B-31, but fails to analyze it within the "whole of the action." It is obvious that this foreseeable expansion would add environmental impacts beyond those of the Project as proposed. Even if not analyzed as a part of the Project, they should, at a minimum, have been analyzed as "cumulative impacts." *Arviv Enterprises, Inc. v. South Valley Area Planning Commission* (2002) 101 Cal. App. 4<sup>th</sup> 1333; *see also* CEQA Guideline §§15064 and 15130. There is no reason to believe that the interconnection to SCE territory would, by itself, increase the use of renewables. However, construction of such a connection would likely produce GHG emissions in a manner similar to those resulting from the proposed Project. In all likelihood, then, the disturbing negative impact of the Project on overall GHG emissions over the Project's life, described in Section I of this comment letter, would be exacerbated by the interconnection to SCE. The DEIR's failure to analyze this possibility is a significant defect. *See also* CEQA Guidelines §§15082, 15121 and 15124.

In addition, the reasonably foreseeable consequence of the Project, with these additional transmission lines, is a potential environmental impact on or to the La Jolla Indian Reservation. Neither consultation with representatives of the La Jolla Indian Reservation nor analysis of these potential direct or cumulative impacts is reflected in the DEIR. *See* Bill Powers, March 12, 2008 Phase II Testimony, pp. 18, 20 and 21. *See* CEQA §§21104 and 21153, and CEQA Guidelines §§15064.5(d) and 15129.

So.....

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**III. The DEIR Fails to Adequately Address an Aggressive, In-Basin Solar Rooftop Initiative.**

As the ALJ reportedly recognized on the first day of testimony in Phase II, the March 27, 2008 application of Southern California Edison in Case No. A-08-03-015 demonstrated the viability of large scale deployment of solar rooftop installations in urbanized areas. Such installations would promote reliability, cost efficiency, and the use of renewables – three purported goals of the proposed Project – but would not require major transmission expansions like the proposed Project, and thus would likely involve few of the Project’s dozens of unmitigatable impacts. Despite this potential, evidenced by both the recent SCE application and the testimony of Bill Powers, the DEIR’s “New In-Area Renewable Generation Alternative,” presented at §E.5, fails to capture the very real possibility of hundreds of megawatts of rooftop solar installations in the San Diego load center, focusing instead on the possible deployment of a questionable solar technology near Borrego Springs. The failure of the DEIR to consider a large scale, in-basin solar deployment is a significant defect because it underestimates the potential for such a plan to achieve the proposed Project’s goals while minimizing environmental impacts. Under CEQA, the Project alternatives that must be considered “shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects.” CEQA Guidelines §15126.6.

**IV. The DEIR Fails to Adequately Analyze and Consider the Need for Reasonably Feasible Mitigation.**

Many of the DEIR’s conclusions that certain impacts have been mitigated, or that other mitigation is infeasible, are not supported by the record. Furthermore, other reasonably feasible mitigation has yet to be fully explored. I refer the CPUC to the various comments in the record prepared by experts in their field to demonstrate why further analysis and clarification on the mitigation proposed is critical to a determination of the adequacy of the proposed Project and alternatives. Mitigation should consider reasonable and feasible on-site mitigation measures as well as appropriate off-site measures. See CEQA Guidelines §§15091, 15097 and 15126.4. For example, the Greenhouse Gas Emission impacts associated with the proposed project and its cumulative effect needed to be more fully analyzed. This would and should have included an analysis of the impacts associated with the Full Loop and the impacts associated with sources of energy generation.

The proposed project’s carbon dioxide emissions (both direct, indirect and cumulative) should be adequately quantified in order to determine appropriate on-site and off-site mitigation. For example, the project mitigation does not adequately address, where feasible, GHG indirect or cumulative impacts from sources of energy generation such as coal generation, other fossil fuels, liquefied natural gas and solar troughs. Solar troughs, for instance, require a substantial water supply which in turn will require substantial energy consumption to get the water to the solar thermal plant. See Bill Powers March 12, 2008 Phase II Direct Testimony pp. 3 and 4. Such energy reliance is a potential consequence of the Project as proposed. The GHG reduction

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benefits of the proposed Project should be compared against the GHG increases associated with the proposed Project, in order to analyze the net effect and feasible mitigation. *See Bill Powers San Diego Smart Energy 2020*. If, after analyzing and requiring all reasonable and feasible on-site mitigation measures for avoiding or reducing greenhouse gas-related impacts, the CPUC determines that additional mitigation is required, then the CPUC should consider additional off-site mitigation. Examples of off-site mitigation might include, after appropriate analysis, funding off-site mitigation projects (e.g., other alternative energy projects, or energy or water audits for existing projects) that will reduce carbon emissions; conducting an audit of SDG&E's other existing operations and agreeing to retrofit; or, purchasing carbon "credits" from another entity that will undertake mitigation. *See Office of the California Attorney General Global Warming Measures* at page 4, Updated: 3/11/08. For an example of concerns and recommendations raised by the California Attorney General on recent projects relating to GHG, see Attorney General Comments on the Chevron Energy and Hydrogen Renewal Project and Draft Environmental Impact Report (Project No. 1101974; SCH# 2005072117), dated July 9, 2007 and March 6, 2008; Attorney General Comments on the Great Valley Ethanol Final Environmental Impact Report, Hanford, Kings County, dated February 19, 2008; and, Attorney General Comments on the Notice of Preparation of EIR For American Ethanol Inc. Com Ethanol Plant, dated January 28, 2008.

**V. Conclusion**

The DEIR, despite the shortcomings outlined in these comments, reaches numerous important conclusions and raises and analyzes countless important issues. Most important, it concludes that the proposed Project ranks nearly at the bottom of the various alternatives in terms of environmental impacts. Further, it suggests nothing that would justify approval of this apparently environmentally inferior proposal in spite of the environmental harms identified. If anything, as discussed here, the DEIR may underestimate the environmental superiority of at least some alternatives. In light of this, it seems likely that, absent major new revelations, the Project cannot be approved as currently proposed.

In a March 25, 2008 letter, I expressed my concern to SDG&E over its apparently imminent failure (stated in a recent SEC filing) to meet state requirements to include 20% renewables in its generation portfolio by 2010. SDG&E, as a franchised utility, owes the City a contractual duty to comply with all applicable laws regarding the use of its facilities in City right-of-way. The City has, for years, been critical of SDG&E's exclusive reliance on transmission expansions as a means of increasing use of renewables.

Based upon substantial evidence in the DEIR's administrative record, including these comments, it is evident a fair argument can be and has been made that significant impacts may occur that have not yet been adequately evaluated. As a consequence, the DEIR, including the scope of the proposed project, other project alternatives and mitigation, should be amended and recirculated to reflect additional analysis and evidence. *See CEQA Guidelines Section 15065 and 15088.5.*

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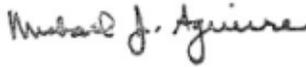
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April 11, 2008

Thank you for considering these comments.

Sincerely yours,

MICHAEL J. AGUIRRE, City Attorney

By   
Michael J. Aguirre  
City Attorney

MJA:MPC:sc

## Condemnation of Property

G0014-16

The California Public Utilities Commission has not satisfied requirements to condemn lands for SDG&E's Sunrise Powerlink, based on its own regulations and in accordance with the California Environmental Quality Act, and due to San Diego Gas and Electric's opposition to provide just compensation and an interest in allowing a carcinogenic health damages and significant losses of life to be promoted over a large region without medical examination or CPUC review, all in opposition to the expressed public interests, the rights of people not to endure life threatening endangerment, loss of home or property without full and equivalent replacement and just compensation, and in spite of known nondamaging alternatives that have not been reviewed by the CPUC nor its consultants, as is required.

The following is an excerpt from the CPUC manual on condemnations, as follows:

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### **HOW DOES THE COMMISSION DETERMINE WHETHER THE CONDEMNATION OF PROPERTY BY A UTILITY IS IN THE PUBLIC INTEREST?**

G0014-16 cont.

#### **1. The Two Legal Standards for Determining Whether the Condemnation of Property is in the Public Interest – “Provider of Last Resort” and “The Four Part Test”.**

Under SB 177, for the Commission to find that a proposed condemnation of property by a public utility is in the public interest, one of the following two standards must be met, either:

##### **A. “Provider of Last Resort”.**

The condemnation must be necessary to provide utility service to an unserved area as a provider of last resort, when there are no competing offers to provide service from facility based carriers. Or:

##### **B. “The Four Part Test”.**

The public utility must show all of the following:

- a. The public interest and necessity require the proposed project; and
- b. The property to be condemned by the public utility is necessary for the proposed project; and
- c. The public benefit of condemning the property outweighs the hardship to the property owner; and
- d. The proposed project is located in a manner most compatible with the greatest public good and the least private injury.

Items B.a through B.d use legal terms. These terms are similar to those used in certain sections of the State Eminent Domain Law. The Commission will determine whether the standards contained in Items B.a through B.d have been met based on the facts in each case and the applicable law.

However, the following information is presented to help public utilities, property owners, and other parties prepare to address Items B.a through B.d at the hearing:\*

\* This general information has been prepared by Commission staff and is based on

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Legislative Committee Comments to certain sections of the State Eminent Domain Law and court decisions interpreting the State Eminent Domain Law. It is possible, however, that the Commission or the courts will interpret the requirements of SB 177 differently, based on its specific language and legislative history, or the facts of a particular case. Again, persons seeking advice regarding a particular case should consult an attorney.

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### **2. Explanation of the Four-Part Test**

#### **A. The Public Interest And Necessity Require The Proposed Project**

This requirement may be interpreted to mean that in order for the public utility to condemn the property to offer competitive services, the public utility's project, including its operations at the property in offering the competitive services, must contribute to the "good" of the community. In making this determination, the Commission may consider a number of factors including, but not limited to:

- The social and economic effects of the public utility's project, including its use of the property for offering competitive services in the area, such as the following examples:
- Is the utility service already provided adequate to serve the community?
- Would having an additional provider of the utility service benefit the community in any way (such as a broader selection of services, better customer service, the addition of new jobs, lower prices due to competition, etc.)?
- Would the competitive services to be provided by the public utility be available to the community as a whole, a number of persons in the community, or only a few persons?
- The environmental effects of the public utility's project, including its use of the property for offering competitive services.
- The effect of the public utility's project, including its use of the property for offering competitive services, on the appearance of the property, neighboring properties, and the community.

#### **B. The Property Proposed To Be Condemned By The Public Utility Is Necessary For The Proposed Project**

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This requirement may be interpreted to mean that the public utility must prove that it has a real need to condemn the property to provide competitive services. In order for the property to be necessary for the provision of competitive services, the property must be suitable as the site for the public utility's use in offering the services.

The public utility should also show that it is necessary to condemn the particular interest in the property that the public utility is attempting to acquire, such as outright ownership, a lease, or an easement, to offer the services.

For example, public utilities, property owners, and other parties may wish to address issues such as:

- Is there a reasonable way for the public utility to provide competitive service without condemning the property (such as using existing facilities, selecting another site, etc.)?
- Is the property to be condemned suitable for use by the public utility in offering the competitive services, in view of its location, topography, existing buildings, environmental conditions, etc.?
- Could the public utility condemn less property and still provide the competitive services?
- Could the public utility condemn a lesser interest in the property (such as an easement rather than outright ownership) and still provide the competitive services?
- Is the public utility attempting to condemn the property in order to meet current or future needs for the competitive service?
- If the public utility is attempting to condemn the property in order to meet future needs for service, when is the need expected to arise?
- If the public utility is attempting to condemn the property in order to meet future needs for service, is there evidence that a new or increased need for this service will arise in the future? (For example, will there be a new or increased need for service based on planned growth in the community, etc.?)

### **C. The Public Benefit Of Acquiring The Property By Eminent Domain Outweighs The Hardship To The Owner Of The Property**

Under this requirement, the Commission will weigh the evidence presented at the hearing to determine whether the benefit to the public that would result from the

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public utility's condemnation of the property in order to offer competitive services is greater than the hardship to the property owner.

For example, at the hearing, public utilities and property owners may wish to address issues such as:

- Would the condemnation of the property for use by the public utility in providing competitive service result in any benefit to the public (such as increased or better service, lower prices due to competition, the addition of new jobs, etc.)?
- What problems (if any) would the property owner face if the property were condemned?
- Would the public utility's condemnation and use of part of the property interfere with the property owner's use and enjoyment of the rest of the property?
- Would the public utility's condemnation of the property require the property owner to relocate a home or business located on the property?

**D. The Proposed Project Is Located In A Manner Most Compatible With The Greatest Public Good And The Least Private Injury**

To satisfy this requirement, a public utility may need to analyze several possible sites for the public utility's operations in offering the competitive services. In order for the public utility to be able to condemn property, the public utility's project, including its operations in offering competitive services, must be located on a site that will benefit the public the most, and cause the property owner the least possible harm.

The public utility's choice of the property to be condemned may be considered correct unless the condemnation and use of another property by the public utility would result in a greater or equal benefit to the public and less harm to the property owner. However, the public utility may not be required to select another property if the condemnation and use of the other property in offering competitive services would result in less benefit to the public.

For example, at the hearing, public utilities and property owners may wish to address issues such as:

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- The cost of the various properties considered for acquisition (if the cost of the property will affect the cost of service to the public)
- The convenience of the various properties considered as the site for use by the public utility and (if the site will be used by customers) the public
- The environmental effects of the public utility's use of the various properties considered for acquisition
- The effect of the public utility's use of the various properties considered for acquisition on the appearance of the properties, the neighborhoods, and the community
- Are there other properties in the area that would be better sites for the public utility's use in offering the competitive services than the property that the public utility is seeking to acquire?
- If yes, how would the public utility's possible condemnation and use of one of the other properties benefit the public, as compared to the property that the public utility is attempting to condemn?

[http://docs.cpuc.ca.gov/Word\\_Pdf/sb\\_177/manual\\_sb177.pdf](http://docs.cpuc.ca.gov/Word_Pdf/sb_177/manual_sb177.pdf)

G0014-16 cont.

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G0014-17

## Jacumba region Rare & Endangered Plants

Within the USGS Jacumba Topo Quad, Southeast San Diego County

open	save	scientific	common	family	CNPS
	<input type="checkbox"/>	<u><a href="#">Astragalus douglasii</a></u> var. <u><a href="#">perstrictus</a></u>	Jacumba milk-vetch	Fabaceae	List 1B.2
	<input type="checkbox"/>	<u><a href="#">Avena compacta</a></u> 	California ayenia	Sterculiaceae	List 2.3
	<input type="checkbox"/>	<u><a href="#">Berberis fremontii</a></u> 	Fremont barberry	Berberidaceae	List 3
	<input type="checkbox"/>	<u><a href="#">Deinandra floribunda</a></u>	Tecate tarplant	Asteraceae	List 1B.2
	<input type="checkbox"/>	<u><a href="#">Dieteria asteroides</a></u> var. <u><a href="#">lagunensis</a></u>	Mount Laguna aster	Asteraceae	List 2.1
	<input type="checkbox"/>	<u><a href="#">Geraea viscida</a></u> 	sticky geraea	Asteraceae	List 2.3
	<input type="checkbox"/>	<u><a href="#">Hulsea mexicana</a></u>	Mexican hulsea	Asteraceae	List 2.3
	<input type="checkbox"/>	<u><a href="#">Ipomopsis tenuifolia</a></u> 	slender-leaved ipomopsis	Polemoniaceae	List 2.3
	<input type="checkbox"/>	<u><a href="#">Linanthus bellus</a></u> 	desert beauty	Polemoniaceae	List 2.3
	<input type="checkbox"/>	<u><a href="#">Lotus haydonii</a></u> 	pygmy lotus	Fabaceae	List 1B.3
	<input type="checkbox"/>	<u><a href="#">Lupinus excubitus</a></u> var. <u><a href="#">medius</a></u> 	Mountain Springs bush lupine	Fabaceae	List 1B.3
	<input type="checkbox"/>	<u><a href="#">Senecio aphanactis</a></u> 	chaparral ragwort	Asteraceae	List 2.2
	<input type="checkbox"/>	<u><a href="#">Tetracoccus dioicus</a></u> 	Parry's tetracoccus	Euphorbiaceae	List 1B.2

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**ECOLOGICAL REPORT**

scientific	family	life form	blooming	communities	elevation	CNPS
<u><i>Astragalus douglasii</i></u> var. <u><i>perstrictus</i></u>	Fabaceae	perennial herb	Apr-Jun	•Chaparral (Chprl) •Cismontane woodland (CmWld) •Pinyon and juniper woodland (PJWld) •Riparian scrub (RpScr) •Valley and foothill grassland (VFGrs)/rocky	900 - 1370 meters	List 1B.2
<u><i>Avenia compacta</i></u>	Sterculiaceae	perennial herb	Mar-Apr	•Mojavean desert scrub (MDSscr) •Sonoran desert scrub (SDScr)/rocky	150 - 1095 meters	List 2.3
<u><i>Berberis fremontii</i></u>	Berberidaceae	perennial evergreen shrub	Apr-Jun	•Chaparral (Chprl) •Joshua tree "woodland" (JTWld) •Pinyon and juniper woodland (PJWld)/rocky	840 - 1850 meters	List 3
<u><i>Deinandra floribunda</i></u>	Asteraceae	annual herb	Aug-Oct	•Chaparral (Chprl) •Coastal scrub (CoScr)	70 - 1220 meters	List 1B.2
<u><i>Dieteria asteroides</i></u> var. <u><i>lagunensis</i></u>	Asteraceae	perennial herb	Jul-Aug	•Cismontane woodland (CmWld) •Lower montane coniferous forest (LCFRs)	800 - 2400 meters	List 2.1
<u><i>Geraea viscida</i></u>	Asteraceae	perennial herb	May-Jun	•Chaparral (Chprl)(often in disturbed areas)	450 - 1700 meters	List 2.3
<u><i>Hulsea mexicana</i></u>	Asteraceae	annual/perennial herb	Apr-Jun	•Chaparral (Chprl)(volcanic, often on burns or disturbed areas)	1200 - 1200 meters	List 2.3
<u><i>Ipomopsis tenuifolia</i></u>	Polemoniaceae	perennial herb	Mar-May	•Chaparral (Chprl) •Pinyon and juniper woodland (PJWld) •Sonoran desert scrub (SDScr)/gravelly or rocky	100 - 1200 meters	List 2.3
<u><i>Linanthus bellus</i></u>	Polemoniaceae	annual herb	Apr-May	•Chaparral (Chprl)(sandy)	1000 - 1400 meters	List 2.3
<u><i>Lotus haydonii</i></u>	Fabaceae	perennial herb	Jan-Jun	•Pinyon and juniper woodland (PJWld) •Sonoran desert	520 - 1200 meters	List 1B.3

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<u>Lupinus excubitus</u> var. <u>medius</u>	Fabaceae	perennial shrub	Mar-May	scrub (SDScr)/rocky •Pinyon and juniper woodland (PJWld) •Sonoran desert scrub (SDScr)	425 - 1370 meters	List 1B.3
<u>Senecio aphanactis</u>	Asteraceae	annual herb	Jan-Apr	•Chaparral (Chprl) •Cismontane woodland (CmWld) •Coastal scrub (CoScr)/sometimes alkaline	15 - 800 meters	List 2.2
<u>Tetradococcus dioicus</u>	Euphorbiaceae	perennial deciduous shrub	Apr-May	•Chaparral (Chprl) •Coastal scrub (CoScr)	165 - 1000 meters	List 1B.2

<http://cnps.web.aplus.net/cgi-bin/inv/inventory.cgi/BrowseAZ?name=quad>

<http://cnps.web.aplus.net/cgi-bin/inv/inventory.cgi/Search?search=%2b%22Jacumba%20%280078%29%203211662%22>

**Jacumba milk-vetch**, *Astragalus douglasii* var. *perstrictus*, Rare, threatened or endangered, in Southeast San Diego County and slightly into Baja, and within the Jacumba Topo Quad



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Sunrise A.06-08-010

**California *Ayenia compacta***, Rare, threatened or endangered, in Eastern San Diego County and within the Jacumba Topo Quad  
[http://calphotos.berkeley.edu/cgi/img\\_query?where-anno=1&rel-taxon=eq&where-taxon=Ayenia+compacta](http://calphotos.berkeley.edu/cgi/img_query?where-anno=1&rel-taxon=eq&where-taxon=Ayenia+compacta)

G0014-17 cont.



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Southeastern communities

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Comment Set G0014, cont.  
California Botanical Habitat

Sunrise A.06-08-010



G0014-17 cont.

Comment Set G0014, cont.  
California Botanical Habitat

Sunrise A.06-08-010

**Freemont barberry**, *Berberis fremontii*, rare evergreen shrub, in Jacumba and Live Oak Springs Topo Quad areas

G0014-17 cont.

