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## MEMORANDUM

TO: Robert Fletcher, San Diego Gas & Electric

FROM: Melissa Busby, Busby Biological Services, Inc.

DATE: October 29, 2014

RE: Response to Data Request 106: Provide a habitat assessment for willowy monardella (Mv; *Monardella viminea*).

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The California Public Utilities Commission (CPUC) has identified data needs for the proposed San Diego Gas & Electric Company (SDG&E) Sycamore to Peñasquitos 230 Kilovolt Transmission Line Project (Proposed Project), Application No. 14-04-011. Data Request 106 states the following:

***“Provide a habitat assessment for willowy monardella (Mv; Monardella viminea).***

*The [Proponent's Environmental Assessment (PEA)] indicates that Mv has very low potential to occur; however, the [California Natural Diversity Database (CNDDDB)] shows locations in drainages that extend into a 1-mile buffer around the alignment.*

*A habitat assessment for this species needs to be completed to identify areas where the species has potential to occur in the [Biological Survey Area (BSA)] based on appropriate habitat requirements for this species. Provide [Geographic Information Systems (GIS)] data of the potential Mv habitat areas based on a field assessment and a write-up of how the habitat assessment was completed.”*

To respond to this data request, Busby Biological Services, Inc. (BBS) and Rocks Biological Consulting, Inc. (RBC) have:

- analyzed the available data for willowy monardella; and
- conducted a focused habitat assessment within the BSA to map areas of suitable habitat.

This memorandum provides a brief description of willowy monardella followed by a summary of the methods and results for this task. This information is intended to supplement the information provided in the Biological Technical Report (BTR) prepared for the Proposed Project (BBS 2014a). For additional information pertaining to the biological resources associated with the Proposed Project, please refer to the BTR.

## **WILLOWY MONARDELLA – SPECIES INFORMATION**

Willow monardella is a federally listed endangered species, a state-listed endangered species, a California Rare Plant Rank (CRPR) 1B.1 species, and an *SDG&E Subregional NCCP*-covered, narrow endemic species. It is an aromatic perennial herb or subshrub that, where present, is observable year round. This species is found at elevations from 150 to 850 feet above mean sea level on the sandy bottoms and banks of alluvial, ephemeral washes in chaparral, coastal sage scrub, and riparian habitats in canyons where surface water flows for usually less than 48 hours after a rain event (U.S. Fish and Wildlife Service [USFWS] 2012, California Native Plant Society [CNPS] 2014).

Willow monardella is known from only eight extant populations in three watersheds north of Kearny Mesa in San Diego County (Figure 1). Six of these extant occurrences occur in drainages east and south of the eastern portion of the BSA on Marine Corps Air Station, (MCAS) Miramar; one of these extant occurrences occurs east of the BSA in Sycamore Canyon Open Space Preserve, which is managed by the County of San Diego; and the other extant occurrence occurs south of the western portion of the BSA in Lopez Canyon.

Willow monardella is threatened by habitat destruction and modification caused by development, hydrological alterations, road construction and maintenance, vehicle activity, and nonnative plant species and possibly also threatened by erosion and alteration of fire regimes (CNPS 2014). As a result of this habitat destruction, this species was state-listed as endangered in 1979 (CNPS 2014) and federally listed as endangered in 1998. At the time of its federal listing, this species was known from 20 extant occurrences, but by 2012 the number had been reduced to only 8 extant occurrences.

## **METHODS**

To evaluate the potential for willow monardella to occur within the BSA, a literature and database review was performed, the special status-plant species survey summary report prepared for the Proposed Project (BBS 2014b) was reviewed, a focused habitat assessment was conducted in the areas that were not previously surveyed, and a focused drainage assessment was completed. The methods for each of these are described in detail below.

### **Literature & Database Review**

A literature review for willow monardella was conducted to supplement the information provided in the BTR (BBS 2014a). In addition, historical occurrence databases (e.g., CNDDDB, SanGIS, SDG&E's internal Sunrise Powerlink) were searched and other references were consulted to better understand the historical location data and distribution of this species in San Diego County.

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## **Special-Status Plant Species Surveys Conducted for the Proposed Project**

Focused special-status plant species surveys were conducted for the Proposed Project by walking meandering transects throughout the BSA, which includes (1) a 500-foot-wide survey corridor along the approximately 16.5-mile alignment, (2) the existing Sycamore Canyon and Peñasquitos Substations, and (3) the proposed Sycamore and Stowe construction yards. These surveys included three survey rounds – one in fall 2013, one in early spring 2014, and one in late spring 2014.

Willow monardella, which is a perennial species that is observable year round, was included in the target species list for the focused special-status plant species surveys conducted for the Proposed Project. All drainages were assessed during the special-status plant species surveys for potentially suitable habitat by highly qualified botanists who are familiar with this species and its phenology. Suitable habitat for willow monardella included drainages with sandy bottoms and banks of alluvial washes in chaparral, coastal sage scrub, and riparian habitats in canyons where surface water flows are ephemeral in nature, usually stopping less than 48 hours after a rain event. Marginally suitable habitat for willow monardella included drainages having at least some, but not all, of these constituent habitat elements.

## **Focused Habitat Assessment in Areas Not Yet Surveyed**

A focused habitat assessment for special-status plant species was conducted in fall 2014 to evaluate the areas that are part of the Proposed Project but that were not included in the original BSA and, thus, were not surveyed during the previous efforts. During these focused habitat assessments, the new survey areas were assessed for their potential to support special-status plant species with a potential to occur within the BSA, including willow monardella.

## **Focused Drainage Assessment**

Potentially suitable drainages located within the BSA were surveyed during fall 2013, early spring 2014, and late spring 2014, and were revisited during fall 2014 to critically review their conditions and their potential to support willow monardella. Suitable habitats were mapped in the field using aerial imagery of the BSA (1 inch = 200 feet) and handheld Global Positioning Systems (GPS) units. Suitable habitat areas were digitized using Google™ Earth based on field notes and waypoints collected in the field.

## **RESULTS**

The results of the literature and database review, special status-plant species survey summary report review, focused habitat assessment in the areas not yet surveyed, and focused vernal pool evaluation are provided, below.

### **Literature & Database Review**

The results of the detailed literature and database review were used to prepare the willow monardella species information provided above. The closest known natural extant occurrence to the BSA is CNDDDB occurrence 21, which is approximately 1 mile east of the eastern portion of the BSA (Figure 1) on MCAS Miramar. Additional occurrences located within approximately 5 miles of the BSA include CNDDDB occurrences 8, 12, 24, 26, and 27 on MCAS Miramar; occurrence 29 in Sycamore Canyon Open Space Preserve; and occurrence 1 in Lopez Canyon.

### **Focused Special-Status Plant Species Surveys Conducted for the Proposed Project**

Botanists identified marginally suitable habitat in three alluvial drainages in the eastern portion of the BSA (Figure 2). Botanists thoroughly searched these marginally suitable habitats during the fall 2013, early spring 2014, and late spring 2014 and surveyed these areas again in fall 2014 during the habitat mapping. Willow monardella was not observed during any of these surveys.

### **Focused Habitat Assessment in Areas Not Yet Surveyed**

Botanists did not identify any additional suitable or marginally suitable habitat for willow monardella during the fall 2014 assessment of areas not previously surveyed.

### **Focused Drainage Assessment**

The entire BSA was reviewed for potential suitable or marginally suitable willow monardella habitats by botanists familiar with the species. The three marginally suitable areas identified during the fall 2013, early spring 2014, and late spring 2014 remain the only marginally suitable habitats in the BSA. These areas were revisited in fall 2014, and photographs of these areas are included, below, and indicated on Figure 2. Drainages are discussed from west to east and described as west (Photograph 1), center (Photograph 2), and east drainages (Photograph 3).

Photograph 1, below, shows the west drainage. This drainage has a few open areas, but it does not receive ephemeral flows as evidenced by the establishment of upland vegetation within the drainage. Flow regimes have been altered by development and upstream flood control. This drainage lacks sandy alluvium required by willow monardella. Furthermore, willow monardella was not observed during thorough searches in fall 2013, early and late spring 2014, and fall 2014.



**Photograph 1: West Drainage**

Photograph 2, below, shows the center drainage. This drainage has a few open areas, but the flow regimes have been altered by development and upstream flood control. This drainage lacks sandy alluvium required by willowy monardella. Furthermore, willowy monardella was not observed during thorough searches in fall 2013, early and late spring 2014, and fall 2014.



**Photograph 2:** Center Drainage

Photograph 3, below, shows the east drainage. This drainage is open and likely receives ephemeral flows, despite alteration by upstream development. Cobble alluvium is present; however, the drainage lacks sandy alluvium required by willow monardella. Furthermore, willow monardella was not observed during thorough searches in fall 2013, early and late spring 2014, and fall 2014.



**Photograph 3: East Drainage**

## **DISCUSSION**

Willow monardella was originally described as having a very low potential to occur within the BSA because it is known to occur within close proximity to the BSA (Figure 1) and there is marginally suitable habitat within the BSA. However, this species is a perennial species that is observable year round but was not observed during any of the focused special-status plant species surveys conducted for the Proposed Project, including those conducted in fall 2013 and spring 2014 as well as the focused habitat assessment conducted in fall 2014.

The results of the focused habitat assessment conducted in the fall 2014 provide additional data to support our conclusion that only very marginal suitable willow monardella habitat occurs within the BSA, because these drainages have altered flood regimes and lack suitable sandy alluvium required by willow monardella. While there is a very low potential that this species could colonize the drainages within the BSA, it is unlikely to happen before implementation of the Proposed Project.

Based on the results of the focused special-status plant species surveys and focused habitat assessment conducted for the Proposed Project, the probability for the willow monardella to occur within the BSA has been reduced from “very low” to “not expected”. Therefore, no impacts to this species are anticipated from implementation of the Proposed Project, and no species-specific avoidance, minimization, or mitigation measures would be

required for willowy monardella. However, because willowy monardella is an *SDG&E Subregional NCCP*-covered, narrow endemic species, SDG&E is required to confer with USFWS and California Department of Fish and Wildlife (CDFW) prior to impacting this species. Therefore, if willowy monardella were observed within the BSA during future survey efforts, SDG&E would avoid impacts to this species because it, and SDG&E would completely avoid impacts to this species. If impacts are unavoidable, SDG&E would confer with USFWS and CDFW to determine appropriate species-specific avoidance, minimization, and mitigation measures to assure the impacts to this species remain less than significant.

## REFERENCES

Busby Biological Services, Inc. (BBS)

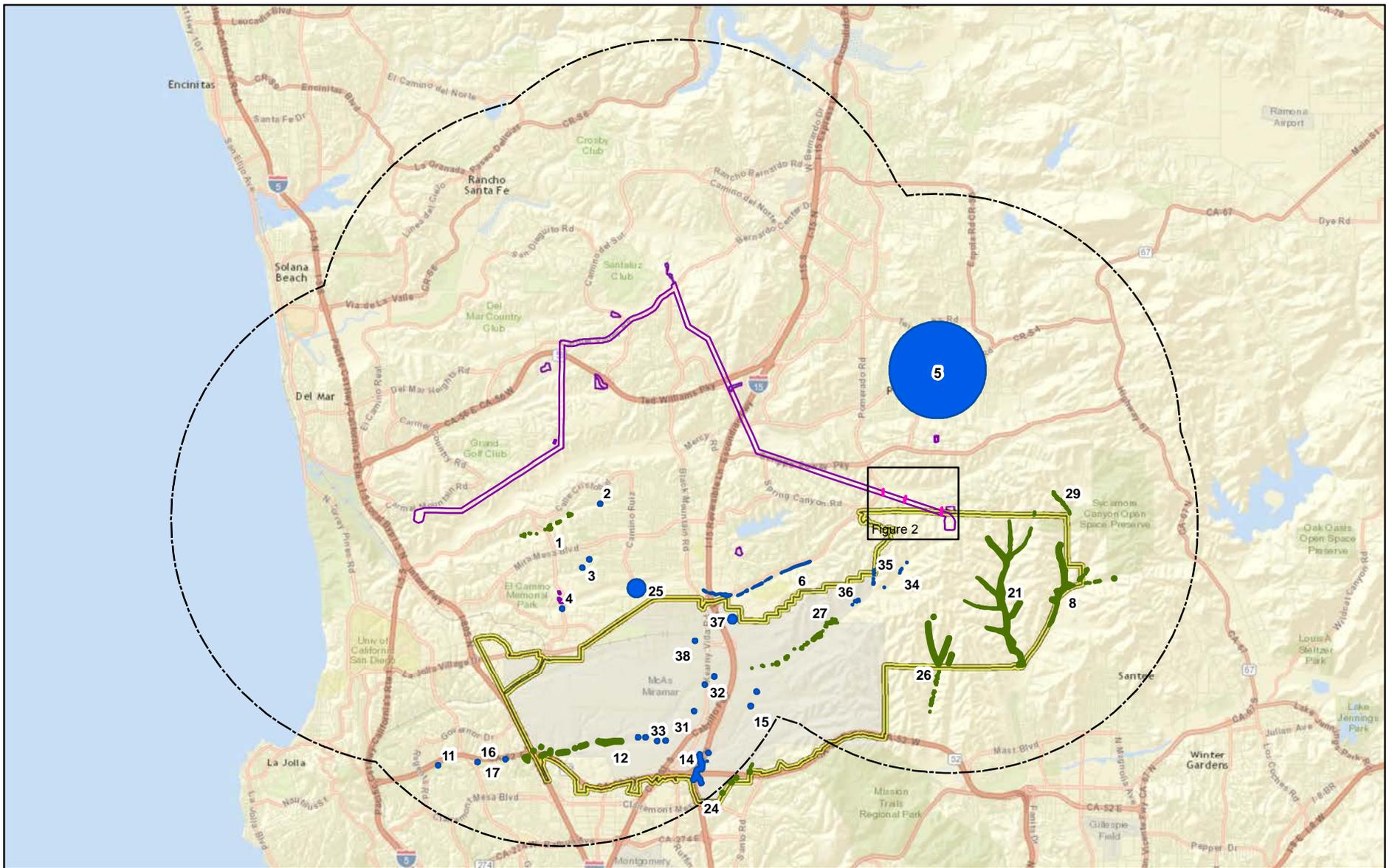
- 2014a Biological Technical Report for Sycamore to Peñasquitos 230 Kilovolt Transmission Line Project, City of San Diego, San Diego County, California. March 2014.
- 2014b Special-Status Plant Survey Summary Report for the Proposed San Diego Gas & Electric Company Sycamore to Peñasquitos 230 Kilovolt Transmission Line Project, San Diego County, California. June 2014.

California Native Plant Society (CNPS)

- 2014 Rare Plant Program. Inventory of Rare and Endangered Plants (online edition, v8-02). California Native Plant Society, Sacramento, CA. Website <http://www.rareplants.cnps.org> [accessed 20 October 2014].

U.S. Fish and Wildlife Service (USFWS)

- 2012 *Monardella viminea* (Willow Monardella). Carlsbad Fish and Wildlife Office, CA August 3. 2012. 9 pgs.



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## Sycamore to Peñasquitos 230 kV Transmission Line Project Historical *Monardella viminea* Locations

Figure 1

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- Marginally Suitable Habitat
- Extant CNDDB Occurrence
- Extirpated CNDDB Occurrence
- # CNDDB Occurrence Number
- BSA
- 5-Mile Buffer Around BSA
- MCAS Miramar





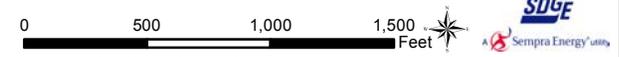
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**Sycamore to Peñasquitos 230 kV Transmission Line Project**  
 Marginally Suitable Habitat for *Monardella viminea* in BSA

**Figure 2**

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-  BSA
-  Marginally Suitable Habitat



Sources: CNDDb October 2014 Database, CA Dept. Fish and Wildlife; Source: Esri, DigitalGlobe, GeoEye, i-cubed, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community