MEMORANDUM

TO: Robert Fletcher, San Diego Gas & Electric

FROM: Melissa Busby, Busby Biological Services, Inc.

DATE: December 15, 2014

RE: Response to Data Request #3, Issue 26: Complete biological surveys in all areas of the Proposed Project that have not been surveyed for biological resources.

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 #3, Issue 26 states the following:

> ***"Complete biological surveys in all areas of the Proposed Project that have not been surveyed for biological resources.***
>
> *SDG&E's response to Data Request #2 was incomplete. There remain some project areas that have not been surveyed based on the revised project GIS and updated survey boundaries (See attachment 2). Additionally, supplemental surveys for rare plants and California gnatcatcher will need to be completed in Spring 2015 as indicated in the response provided. Provide specific dates when these pending submittals will be provided.*

To respond to this data request, Busby Biological Services, Inc. (BBS) conducted general biological surveys (i.e., vegetation mapping and habitat assessments) within the portions of the Biological Survey Area (BSA) that were added after the initial surveys of the original BSA were completed and after the surveys conducted in response to Data Request #2 were performed.

This memorandum provides a description of the methods and results used for the general biological surveys. 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.

METHODS

The methods used for the vegetation mapping and habitat assessments are described, below.

Vegetation Mapping Methods

Vegetation communities and land cover types within the portions of the BSA that are outside of previously surveyed areas were delineated by hand in the field using color aerial imagery with an approximately 1 inch equals 84-foot scale. Access roads that may be used during implementation of the Proposed Project were surveyed and included a 30-foot buffer from the center line of the road to capture both the road and an approximately 20-foot buffer along both sides of the road. Other areas – such as staging yards and stringing sites that are part of the Proposed Project footprint – were surveyed along with a 50-foot buffer around the potential impact area.

Biologists mapped the vegetation communities and land cover types by walking through the areas that were not previously surveyed and documented the dominant plant species within each of the vegetation communities and land cover types. After the field mapping was completed, biologists reviewed each map for consistency or errors, and the hand drawn vegetation community and land cover type boundaries were digitized in the office using Geographic Information Systems (GIS) software.

Vegetation community classifications are consistent with, or similar to, Holland (1986) and plant names largely follow Rebman and Simpson (2006), but updated names are included where applicable (Baldwin et. al 2012). Vegetation communities are identified according to the estimated percent cover of the combination of dominant plant species observed. Vegetation community classifications are based on a dominant species comprising approximately 50 percent or more of the total cover within the mapped unit relative to the list of dominant species for a given Holland vegetation community (e.g., grasslands must have approximately 50 percent cover of dominant grassland species to be mapped as that particular community). Mixed communities are identified where species comprising a second vegetation community are present at approximately 35 percent or higher percent cover and intermixed with the dominant vegetation community. When necessary, modifiers are added to certain vegetation classifications to describe a single species that dominates the vegetation class. For example, when a chaparral community is dominated by chamise (*Adenostoma fasciculatum*) rather than the mix of different shrubs, the community is identified as chamise chaparral rather than southern mixed chaparral.

Additionally, certain natural vegetation communities are given a disturbed modifier when they have evidence of disturbance such as clearing, agricultural use, off-road vehicle damage, or illegal trash disposal. These areas are generally characterized by a highly reduced and fragmented vegetative cover and may support a high percentage of nonnative grasses or ruderal species, particularly in the understory. This is notated on the vegetation maps as a "D" placed after the name or acronym of the habitat.

Habitat Assessments Methods

In addition to the vegetation mapping, BBS also conducted habitat assessments within the portions of the BSA and associated buffers that were not surveyed previously. These habitat assessments were intended to determine if the potential for occurrence of any of the previously discussed special-status species needed to be updated, if additional special-status species needed to be added to the lists of special-status species with a potential to occur within the BSA, and/or if additional focused special-status species surveys may be required to assess potential impacts that are anticipated to occur from implementation of the Proposed Project.

RESULTS

The results of the vegetation mapping and habitat assessments are described, below.

Vegetation Mapping Results

Biologists mapped vegetation communities and land cover types in the newly added areas of the BSA between late November and mid December 2014. No additional vegetation communities or land cover types were identified within the portions of the BSA assessed as part of this survey effort, and the descriptions of the vegetation communities and land cover types remain consistent with those presented in the BTR (BBS 2014a).

With the addition of new access roads, staging areas, stringing sites, and other new work areas, the BSA is now approximately 1,214.79 acres. This includes the original BSA that is presented in the BTR (BBS 2014a) as well as all of the newly added staging yards, access roads, Encina Hub, Mira Mesa Hub, and other work areas and their associated survey buffers (i.e., 20 feet for roads and 50 feet for other types of work areas).

Table 1, below, provides a breakdown of this acreage into the 25 different vegetation community and land cover type categories. For a detailed description of each vegetation community, please refer to the BTR that was prepared for the original BSA (BBS 2014).

Table 1. Vegetation Communities and Land Cover Types within the BSA

NCCP Vegetation Community	Holland Vegetation Community/Land Cover Type	Approx. Acreage
Coastal Sage Scrub	Diegan Coastal Sage Scrub	188.39
	Diegan Coastal Sage Scrub – Disturbed	42.39
	Coastal Sage Scrub – Revegetated	63.63
Coastal Sage/Chaparral Mix	Coastal Sage – Chaparral Scrub	11.19
Chaparral	Chamise Chaparral	79.42
	Chamise Chaparral - Disturbed	5.74
	Southern Mixed Chaparral	100.61
	Southern Mixed Chaparral – Disturbed	13.63
	Scrub Oak Chaparral	81.54
Grassland	Native Grassland	10.97
	Nonnative Grassland	91.71
Alkali Marsh	Alkali Marsh – Revegetated	0.29
Freshwater Marsh	Freshwater Marsh	0.49
Inland Water	San Diego Mesa Vernal Pool	0.10
	Open Water*	0.92
Riparian Scrub	Southern Riparian Scrub	1.72
	Mulefat Scrub	1.77
	Southern Willow Scrub	3.41
	Tamarisk Scrub	0.40
Coast Live Oak Riparian Forest	Southern Coast Live Oak Riparian Forest	2.86
Eucalyptus Forest	Eucalyptus Woodland*	5.14
Disturbed Habitat	Disturbed Habitat*	56.62
N/A	Developed Lands*	290.63
	Ornamental*	94.03
	Bare Ground*	67.19
	TOTAL	1,214.79**

*This classification does not have a Holland Code. **Total reflects actual total without rounding error.

Habitat Assessments Results

The habitat assessments conducted in the portions of the BSA that were not previously surveyed and the associated buffer areas indicate that additional special-status species surveys may be required to assess potential impacts that are anticipated to occur from implementation of the Proposed Project. Suitable habitat for both special-status plant species and special-status wildlife species was identified during these surveys. However, no additional special-status species that were not covered in the BTR have the potential to occur within the BSA, and the potential for occurrence for all of the special-status species did not change based on the habitat assessments in these areas (BBS 2014a and BBS 2014b).

DISCUSSION

No focused special-status species surveys were conducted in the portions of the BSA and buffer areas that were surveyed and assessed as part of the general biological surveys described above. Based on the results of the vegetation mapping and habitat assessments conducted in these areas, we anticipate that focused special-status plant species surveys, coastal California gnatcatcher surveys, and burrowing owl surveys will be required. In addition, a focused wetland assessment will be performed within the areas of the BSA that have not been assessed for wetlands, and a wetland delineation will be performed, if needed. Each of these surveys will be conducted in 2014 or 2015, and the results will be presented in survey summary memorandums/reports for each individual task. No other focused special-status species surveys are anticipated for the Proposed Project.

REFERENECES

Baldwin, B. G., D. H. Goldman, D. J. Keil, R. Patterson, T. J. Rosatti, and D. H. Wilken, editors.

2012 *The Jepson manual: vascular plants of California, second edition*. University of California Press, Berkeley.

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.

Rebman, J.P. and M.G. Simpson

2006 *Checklist of the Vascular Plants of San Diego County*, 4th Edition. San Diego. Natural History Museum, San Diego, California.