SDG&E February 21, 2012 Response A. 11-10-015 Mira Sorrento Project PTC Energy Division Data Request 01 Dated February 3, 2012 SDGE-ED-001: Q 1

Question #1

SDG&E Response to Q4.3c:

The disturbed habitat designation was based on percent cover of non-native grasses, which was less than 50 percent. The determination is based upon a visual estimate by the field biologists. This mapping is also consistent with the original biological technical report prepared by Essex Environmental (2003). There are components of non-native grasslands, as noted in the species list. However, based on the evaluation from the field visit, the preponderance of the habitat type (i.e., more than 50%) is disturbed habitat.

Data Request: Please provide transect data documenting that the site is 50 percent forbs. Without transect data, the vegetation will be analyzed as non-native grassland and not disturbed habitat. Portions of the mapped area appear to have a higher percentage of grass and some areas a high percentage of weedy forbs. The City of San Diego has mapped the area as non-native grassland.

SDG&E Response:

A vegetation transect survey was completed by RECON on February 16, 2012. The results of the transect survey are provided in the attached letter report. The transect survey shows that the habitat is accurately labeled as disturbed based on the high percentage of weedy forbs.

1927 Fifth Avenue San Diego, CA 92101 P 619.308.9333 F 619.308.9334 www.recon-us.com 525 W. Wetmore Rd., Ste 111 Tucson, AZ 85705 P 520.325.9977 F 520.293.3051 1504 West Fifth Street Austin, TX 78703 P 512.478.0858 F 512.474.1849 2027 Preisker Lane, Unit G Santa Maria, CA 93454 P 619.308.9333 F 619.308.9334



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February 21, 2012

Mr. Alex Jewell Environmental Analyst RBF Consulting 9755 Clairemont Mesa Blvd., Suite 100 San Diego, CA 92124-1324

Reference: Results of the 2012 Transects for San Diego Gas & Electric's Mira Sorrento Substation Project (RECON Number 4938)

Dear Mr. Jewell:

This letter serves as an amendment to the biological technical report prepared by RECON Environmental, Inc. (RECON 2010) for the Mira Sorrento Substation Project, which is located in the community of Mira Mesa in the city of San Diego. In response to the California Public Utilities Commission's (CPUC) request in the Determination of Completeness letter dated February 3, 2012, RECON surveyed vegetation transects in order to confirm the designation of disturbed habitat within the Mira Sorrento Substation Project area, as presented on the vegetation map in the 2010 biological technical report (RECON 2010). The methods, results, and final mapping determination are provided herein.

Methods

On February 16, 2012, RECON biologists Brenna Ogg and Kayo Valenti surveyed the disturbed habitat as mapped in the 2010 biological technical report (RECON 2010). The largest stand of disturbed habitat was sampled using the point-intercept transect monitoring method to estimate percent cover of grasses and non-native forb species. This method uses a 50-meter-long transect centered in a 50-meter by 5-meter plot. Vegetation was sampled by the point method at every 0.5-meter interval along three 50-meter transect lines to determine species and cover. The percent cover was determined by dividing the number of intercepts of grasses or non-native forbs by the total number of sample points. All plant species observed within the 50-meter by 5-meter plot were also recorded. Transect locations are provided on Figure 1.

Due to the small size of the remaining polygons identified as disturbed habitat, no transects were surveyed for these areas. The percent cover of grasses and non-native forbs was determined by visual estimates.

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Results

Overall non-native grass cover within the largest stand of disturbed habitat ranged between 6 and 40 percent, with an average of 21 percent. Overall non-native forb cover within the disturbed habitat ranged between 88 and 91 percent, with an average of 89 percent. The common non-native grass species encountered during point-intercept sampling were rattail fescue (*Vulpia myuros*) and red brome (*Bromus madritensis* ssp. *rubens*). Dominant non-native forb species included Italian thistle (*Carduus pycnocephalus*) and black mustard (*Brassica nigra*). Other species encountered in low numbers during point-intercept sampling included bristly ox-tongue (*Helminthotheca echioides*) and red-stemmed filaree (*Erodium cicutarium*), Additional plant species observed in low density within the 50-meter by 5-meter plots included fennel (*Foeniculum vulgare*), California geranium (*Geranium californicum*), wild oat (*Avena* sp.), poison hemlock (*Conium maculatum*), and coyote brush (*Baccharis pilularis*). Photographs 1 through 3 show south-facing views of each transect.

While no transects were placed within the smaller polygons identified as disturbed habitat, visual estimates of vegetative cover confirmed that these areas were similar in composition to the larger polygon surveyed. Photograph 4 provides an east-facing view of the easternmost disturbed habitat polygon. This area was typical of the remaining disturbed habitat polygons, within which nonnative forb species dominated, and few to no non-native grasses were observed.

Conclusion

Based on the results of the vegetation transect survey described above, the disturbed habitat vegetation mapping provided in the 2010 biological technical report accurately reflects the current condition of the project survey area. The areas mapped as disturbed habitat support well over 50 percent cover of forbs and less than 50 percent cover of grasses. No non-native grassland was identified within the project survey area.

If you have any questions concerning the contents of this letter, please contact me.

Sincerely,

Brenna Ogg Associate Biologist

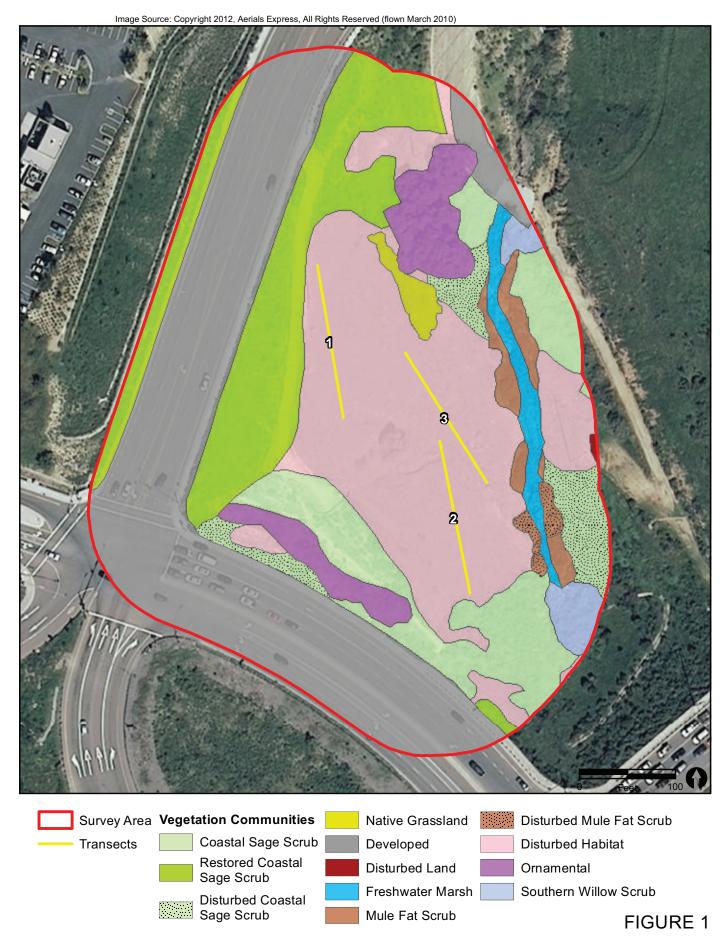
Brenna & Off

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References

RECON

2010 Biological Technical Report for the Mira Sorrento Substation Project, City of San Diego, California. RECON Number 4938. June 4.





Existing Biological Resources and Transect Locations within the Mira Sorrento Substation Project Survey Area



PHOTOGRAPH 1
Facing South from the Start of Transect 1, February 16, 2012



PHOTOGRAPH 2 Facing South from the Start of Transect 2, February 16, 2012





PHOTOGRAPH 3 Facing South from the Start of Transect 3, February 16, 2012



PHOTOGRAPH 4
Disturbed Habitat within Eastern Portion of the
Survey Area, Facing East, February 16, 2012

