2018 FOCUSED PLANT SURVEY RESULTS FOR THE TL 649 WOOD-TO-STEEL POLE REPLACEMENT PROJECT

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2018 Focused Plant Survey Results for the TL 649 Wood-to-Steel Pole Replacement Project Cities of San Diego and Chula Vista, California

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SECTION 1.0 – PROJECT DESCRIPTION

SDG&E proposes the TL 649 Wood-to-Steel Pole Replacement project (Proposed Project) in an effort to fire-harden existing facilities in SDG&E's service territory. SDG&E proposes to replace wood poles with steel poles along the existing 69-kilovolt (kV) single-circuit power line. Installation of steel poles will minimize damages to utilities in the event of a fire, thereby increasing system reliability, decreasing routine maintenance needs, and increasing the life span of both the poles and the entire line.

Specifically, SDG&E proposes to conduct the following activities as part of the Proposed Project:

- Replace approximately 118 existing wood power line and interset distribution line poles with galvanized steel structures. Of the 118 replacement structures, approximately 21 poles will require a pier foundation, approximately 7 will require a micropile foundation, and the remaining 90 will be directly buried.
- Reroute approximately 130 feet of existing underground distribution lines.
- Remove approximately 15 existing wood poles.
- Install approximately two new steel poles.
- Conduct overhead work on one existing pole.
- Transfer existing power line conductors to the new steel poles.
- Replace the existing distribution conductors with new aluminum conductor steel-reinforced (ACSR) distribution conductors.

1.1 PROJECT LOCATION

This segment of TL 649 is located in the Cities of San Diego and Chula Vista, California (State), as well as unincorporated San Diego County (County) (Figure 1). The Proposed Project extends east from Black Coral Way and Sea Lavender Way in the City of San Diego for approximately 5.0 miles; then travels south for approximately 2.0 miles to just north of Otay Mesa Road in unincorporated San Diego County. Over this distance, TL 649 traverses private and public lands, including lands owned by the County of San Diego, the City of Chula Vista, the State of California, and SDG&E.

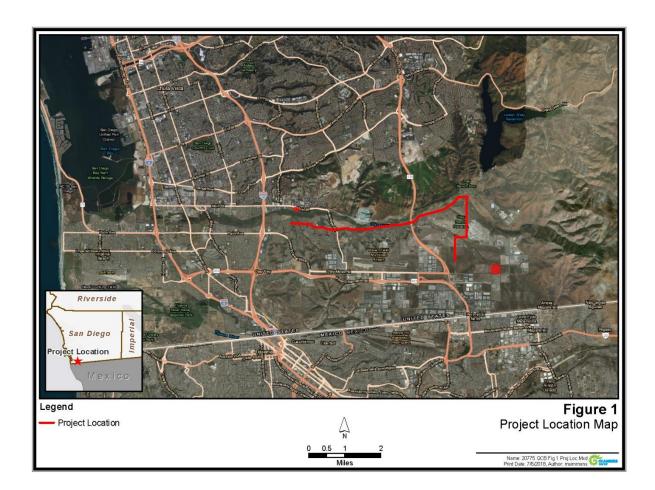


Figure 1. Project Location Map

1.2 2018 SURVEY AREA LOCATION

The following paragraphs describe surveys that were conducted within the Biological Survey Area (BSA) for the Proposed Project. The BSA covers the Proposed Project area (i.e., the physical limits of all proposed work areas) and also includes a 300-foot buffer (150 feet on each side of the transmission centerline), a 10-foot buffer along both sides of access roads, and a 50-foot buffer around staging yards and other work areas in order to account for minor shifts in work areas where potential indirect effects to biological resources could occur.

1.3 PURPOSE OF THE SURVEYS

The purpose of the 2018 botanical surveys was: 1) to update the existing vegetation communities maps based on current conditions and revised engineering design, and 2) to update the 2014 focused plant surveys with any new occurrences of special-status plant species, particularly within the Proposed Project work areas per BIO-1 of the Mitigation Monitoring and Reporting Plan (MMRP) for the Project. Understanding the constraints within their work areas and any potential mitigation necessary will assist SDG&E with final design of their project and biological monitoring needs.

1.4 VEGETATION TYPES

There were 35 vegetation communities and 2 additional unvegetated areas identified within the BSA in 2018 (Table 1). Vegetation community names, to the greatest extent possible, follow the *Manual of California Vegetation*, *Second Edition* (MCVII, Sawyer et al. 2009). Vegetation types were originally mapped by Chambers Group biologists in 2014 and updated in 2018 (Table 1 and Appendix A). Descriptions of the communities can be found in the Biological Technical Report for the project (Chambers Group 2015).

Table 1. TL649 Wood-To-Steel Project Vegetation Communities

Vegetation Communities				
Annual Brome Grassland	Lemonade Berry Stand			
Arroyo Willow-Mulefat Woodland	Mulefat Thickets			
Black Willow Forest	Mulefat Thickets-Restoration			
Broom Baccharis Scrub	Pale Spike Rush Marshes			
Disturbed Broom Baccharis Scrub	Purple Needlegrass Grassland			
California Bulrush Marsh	Disturbed Purple Needlegrass Grassland			
California Sagebrush-California Buckwheat Scrub	San Diego Mesa Claypan Vernal Pool			
Disturbed California Sagebrush-California	Disturbed San Diego Mesa Claypan			
Buckwheat Scrub	Vernal Pools			
Castor Bean Thickets	San Diego Mesa Claypan Vernal Pool Native Grassland Mix			
Coast Prickly Pear Scrub	Singlewhorl Burrobush-Broom Baccharis Scrub			
Coast Prickly Pear Scrub-Restoration	Singlewhorl Burrobush Scrub			
Disturbed Coast Prickly Pear Scrub	Spiny Rush Marsh-Restoration			
Creeping Ryegrass Grassland	Tamarisk Thickets			
Disturbed	Tecate Cypress Stands			
Fremont Cottonwood Forest	Upland Mustard-Fennel Alliance			
Giant Reed Breaks	Upland Mustards			
Landscape/Ornamental	Vegetated Rip-Rap Channel			
Lemonade Berry - California Sagebrush- California Buckwheat Scrub				
Other Areas				
Urban and Developed	Bare Ground			

SECTION 2.0 – METHODS

The surveys focused on plant species within the following four designations: 1) Federally threatened and federally endangered (FT and FE), 2) California state listed threatened and state endangered (CT and CE), 3) SDG&E's Subregional Natural Community Conservation Plan and Habitat Conservation Plan (NCCP/HCP), and 4) California Rare Plant Rank (CRPR) 1, 2, 3, and 4. Plants with a rare plant rank of 1 and 2 are, in general, subject to CEQA Guidelines Section 15380(b) criteria, and adverse effects to these species may be considered significant. Impacts to plants that have a rare plant rank of 3 or 4 are also considered during CEQA review, although because these species are typically not as rare as those with ranks of 1 or 2, impacts on them are less frequently considered potentially significant. The surveys were conducted in accordance with the California Department of Fish and Wildlife (CDFW) *Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Natural Communities* (CDFW 2000) and the California Native Plant Society's (CNPS) Botanical Survey Guidelines (CNPS 2001).

A list of special-status plant species was developed for the Proposed Project by reviewing the results of various database searches for special-status plant species reported within 5 miles of the BSA. The focused plant surveys were conducted in two rounds by Chambers Group botanists Clark Austin, Natalie Borchardt, Caesara Brungraber, Heather Clayton, Travis Cooper, Brian Cropper, John Dicus, Melanie Dicus, Dave Fleitner, Maya Mazon, Kaelin McAtee, Margie Mulligan, and Andrew Pigniolo. The 2018 survey dates were April 23-24, 26-27, and 30; and June 11-13, and 25-27, 2018.

During the focused plant surveys, the botanists both visually scanned and walked meandering transects through the entire BSA for the presence of special-status plant species. When a special-status plant species was observed, a waypoint was taken with a handheld Global Positioning System (GPS) device that recorded the plant's location. Where vegetation was very dense on steep slopes or behind fenced areas (e.g., Donovan State Prison), documentation of some species was accomplished through the use of binoculars and marking of the species' location on a field map that was later digitized and incorporated into the Geographic Information System (GIS) database.

The surveys included all areas identified by SDG&E as potential work areas and associated rights-of-way in both 2014 and 2018. Additional surveys were conducted in 2015 by Blackhawk Environmental, but were only relegated to areas associated with installation of an underground zinc ribbon for cathodic corrosion protection of the gas pipeline beneath the powerline. Table 3 includes counts for those perennial species observed in 2014 and 2015 as well as additional individuals observed in 2018. Botanists checked populations of perennial species observed in 2014 to verify presence of those populations in 2018. If additional individuals were observed, these were counted and recorded. No retractions were made to the 2014 dataset except within an identified work area if perennial species were no longer present at the time of the 2018 surveys.

Due to the ephemeral nature of herbaceous annual species and bulbiferous species, only those special-status individuals of annual species observed in 2018 are presented in Table 3. Absence of a previously observed herbaceous individual in 2014 or 2015 does not preclude its presence in 2018 even if it was not again observed. Rainfall in 2018 was below average as is shown in Table 2 (NOAA 2018). As in 2014, the below average precipitation and above average temperatures in 2018 may have reduced the occurrences of special-status plants during the surveys (e.g., the density of annual species such as Otay tarplant may have been lower than historically recorded during times of above-average rainfall). Many plants will go into early dormancy without sufficient water; during dormancy, the plants often forego producing flowers and may not be evident. It is presumed that herbaceous species, if observed in 2014 or 2015, may still be

present in the seed bank or below ground (e.g., *Bloomeria clevelandii*) in 2018 and they have the potential to flower in future years under sufficient rainfall conditions.

Table 2: Weather Conditions of Chula Vista (April-August 2018)

Month (2018)	Total Precipitation (inches)	Weather Conditions & Storm Events
April	0.05	No storm events. Above average temperatures.
May	0.20	No storm events. Above average temperatures.
June	none	No storm events. Above average temperatures.
July	none	No storm events. Above average temperatures.
August	none	No storm events. Above average temperatures.

All plant species observed during the focused surveys are included in Appendix B. Plants of uncertain identity were collected and subsequently identified from keys, descriptions, and illustrations in *The Jepson Manual: Vascular Plants of California, Second Edition* (Baldwin et al. 2012) and *A Flora of Southern California* (Munz 1974). Plant nomenclature follows that of the *Checklist of the Vascular Plants of San Diego County, Fifth Edition* (Rebman and Simpson 2014) and Baldwin et al. (2012), where appropriate.

SECTION 3.0 – RESULTS

A total of 404 plant species, including 225 native species and 179 non-native species, were observed within the BSA during the 2014, 2015 and 2018 surveys (Appendix B). Twenty-seven special-status species were observed during the 2014, 2015 and 2018 surveys (Table 3), where three are federal- and/or state-listed as endangered species. Two special-status species were only observed during a separate survey effort along a portion of the alignment for the zinc ribbon project in 2015, but these species were not again observed in 2018. This may have occurred due to below average rainfall totals during the 2018 growing season.

The surveys were conducted during the appropriate blooming period for all target species. No other federal- and/or state-listed endangered or threatened or otherwise sensitive plant species were observed during the surveys. Point and polygon data from 2014, 2015 and 2018 are shown on the focused plant survey results maps (Appendix C). Representative photographs of the special-status plant species observed during the 2018 surveys are included in Appendix D.

Table 3. Special-Status Plant Species Observed

Scientific Name	Common Name	Blooming Period	Status*	Number of Individuals Observed
Adolphia californica	spineshrub	December to March	CRPR 2B.1	34
Ambrosia chenopodiifolia	San Diego bur-sage	April to June	CRPR 2B.1	282
Ambrosia monogyra	leafy burrobush	August to November	CRPR 2B.2	2,088
Arctostaphylos otayensis	Otay manzanita	January to April	CRPR 1B.2	1
Artemisia palmeri	Palmer's sagewort	May to September	CRPR 4.2	31
Atriplex pacifica	South Coast saltbush	March to October	CRPR 1B.2	16
Bahiopsis [Viguiera] laciniata	San Diego sunflower	February to August	CRPR 4.3	2,000
Bergerocactus emoryi	golden-club cactus	May to June	CRPR 2B.2	303
Bloomeria clevelandii	San Diego goldenstar	April to May	CRPR 1B.1, NCCP- Covered	327
Ceanothus otayensis	Otay-lilac	January to April	CRPR 1B.2	1
Convolvulus simulans	small-flower bindweed	March to July	CRPR 4.2	10

Scientific Name	Common Name	Blooming Period	Status*	Number of Individuals Observed
Deinandra conjugens	Otay tarplant	May to June	FT, CE, CRPR 1B.1, NCCP- Covered	735
Dicranostegia orcuttiana	Orcutt's bird's-beak	April to July	CRPR 2B.1	25
Dudleya variegata^	variegated dudleya	April to June	CRPR 1B.2, NCCP- Covered	265
Eryngium aristulatum var. parishii	San Diego button-celery	April to June	FE, CE, CRPR 1B.1, NCCP- Covered	12
Euphorbia misera	cliff spurge	December to August	CRPR 2B.2	38
Ferocactus viridescens	coast barrel cactus	May to June	CRPR 2B.1, NCCP- Covered	646
Hesperocyparis forbesii	Tecate cypress	N/A (conifer)	CRPR 1B.1, NCCP- Covered	1,429
Harpagonella palmeri	Palmer's grapplinghook	March to May	CRPR 4.2, NCCP- Covered	1
Holocarpha virgata subsp. elongata	graceful tarplant	May to November	CRPR 4.2	807
Isocoma menziesii var. decumbens	decumbent goldenbush	April to November	CRPR 1B.2	1,619
Iva hayesiana	San Diego marsh-elder	April to October	CRPR 2B.2	1,434
Juncus acutus subsp. Ieopoldii	southwestern spiny rush	May to June	CRPR 4.2	145
Myosurus minimus subsp. apus	little mousetail	March to June	CRPR 3.1, NCCP- Covered	1,230
Rosa minutifolia	small-leaf rose	January to June	CE, CRPR 2B.1, NCCP- Covered	43
Salvia munzii	Munz's sage	February to April	CRPR 2B.2	2,139

Scientific Name	Common Name	Blooming Period	Status*	Number of Individuals Observed
Selaginella cinerascens	mesa spike-moss	N/A	CRPR 4.1	rhizomatous habit, >1,000

^{^:} Observed during 2015 surveys conducted for the zinc ribbon project only; none observed during 2014 or 2018 rare plant survey efforts.

^{*:} Federal or State (California) Listed FE = Federally Endangered; FT = Federally Threatened; CT = State Threatened; CE = State Endangered; California Rare Plant Rank (CRPR) 1A = Plants presumed extinct in California; 1B = Plants Rare and Endangered in California and throughout their range; 2 = Plants Rare, Threatened, or Endangered in California but more common elsewhere in their range; 3 = Plants about which we need more information; a review list; 4 = Plants of limited distribution; a watch list (CRPR 4 species are not generally identified in the literature and database review. However, if a CRPR 4 species was observed during the focused plant surveys, this species was documented.) CRPR Extensions 0.1 = Seriously endangered in California (greater than 80 percent of occurrences threatened/high degree and immediacy of threat); 0.2 = Fairly endangered in California (20 to 80 percent occurrences threatened); 0.3 = Not very endangered in California (less than 20 percent of occurrences threatened). NCCP-Covered = species conserved by SDG&E's Subregional Natural Community Conservation Plan and Habitat Conservation Plan (NCCP/HCP) through the California Department of Fish and Wildlife.

SECTION 4.0 – SPECIAL-STATUS PLANT SPECIES

The following paragraphs describe characteristics of those special-status plant species, arranged alphabetically by scientific name, that were observed in 2014, 2015 and/or 2018.

4.1 SPECIES DESCRIPTIONS

4.1.1 Spineshrub

Spineshrub (*Adolphia californica*) is a CRPR 2B.1 species. This perennial deciduous shrub blooms between December and March. It grows in clay soils in chaparral, coastal scrub, and valley and foothill grassland habitats from 30 to 1,320 feet in elevation. The range of this species includes southwestern San Diego County and Baja California where it is threatened by urbanization, road construction, non-native plants, development and grazing (CNPS 2018).

Spineshrub was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.2 San Diego bur-sage

San Diego bur-sage (*Ambrosia chenopodiifolia*) is a CRPR 2B.1 species. This perennial shrub blooms between April and June. It grows in coastal scrub habitats from 165 to 465 feet in elevation. This species is only found in southwestern San Diego county and Baja California, where this species is known from fewer than 15 occurrences in California and is threatened by development (CNPS 2018).

San Diego bur-sage was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.3 Leafy burrobush

Leafy burrobush (*Ambrosia monogyra*) is a CRPR 2B.2 species. This perennial shrub blooms between August and November. It grows on sandy soils in chaparral and Sonoran Desert scrub habitats from 30 to 1,500 feet in elevation. The range of this species includes Riverside, San Bernardino, and San Diego Counties; and Arizona, Baja California, New Mexico, Nevada, Sonora, and Texas. This species is threatened by development (CNPS 2018).

Leafy burrobush was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.4 Otay manzanita

Otay manzanita (*Arctostaphylos otayensis*) is a CRPR 1B.2 species. This perennial evergreen shrub blooms between January and April. It grows metavolcanic in chaparral habitats or cismontane woodlands from 825 to 5,100 feet in elevation. This species is only known in San Diego County where it is threatened by development and frequent wildfires (CNPS 2018).

Otay manzanita was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.5 Palmer's sagewort

Palmer's sagewort (*Artemisia palmeri*) is a CRPR 4.2 species. This perennial deciduous shrub blooms between May and September and grows in sandy, mesic soils in chaparral, coastal scrub, riparian forest, riparian scrub, and riparian woodland habitats from 45 to 2,745 feet in elevation. This species is only found in San Diego County and Baja California where it is threatened by development and flood control projects, and possibly by non-native plants (CNPS 2018).

Palmer's sagewort was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.6 South coast saltbush

South coast saltbush (*Atriplex pacifica*) is a CRPR 1B.2 species. This annual herb blooms between March and October and grows in coastal bluff scrub, coastal dunes, coastal scrub, and playas up to 460 feet in elevation. The range of this species includes Los Angeles, Orange, Riverside, Santa Barbara, San Diego, and Ventura Counties; and Anacapa, San Clemente, Santa Catalina, Santa Cruz, San Nicolas and Santa Rosa Islands. This species is considered rare throughout its range and many known occurrences have been extirpated. It is threatened by urbanization on the mainland (CNPS 2018).

South coast saltbush was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.7 San Diego sunflower

San Diego sunflower (*Bahiopsis* [*Viguiera*] *laciniata*) is a CRPR 4.3 species. This perennial shrub blooms between February and June and with enough rainfall will bloom into August as well. It grows in chaparral and coastal scrub habitats from 180 to 1,500 feet in elevation. This species is only found in San Diego county where it is threatened by urbanization and development (CNPS 2018).

San Diego sunflower was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.8 Golden-club cactus

Golden-club cactus (*Bergerocactus emoryi*) is a CRPR 2B.2 species. This perennial stem succulent blooms between May and June. It grows in sandy soils in closed-cone coniferous forests, chaparral and coastal scrub habitats from up to 1,185 feet in elevation. The range of this species includes Los Angeles and San Diego Counties, and San Clemente and Santa Catalina Islands. This species is threatened by development, horticultural collecting, and feral goats (CNPS 2018).

Golden-club cactus was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.9 <u>San Diego goldenstar</u>

San Diego goldenstar (*Bloomeria clevelandii*) is a CRPR 1B.1, NCCP-covered species. This perennial bulb blooms between April and May. It grows in clay soils in chaparral, coastal scrub, valley and foothill grassland, and vernal pool habitats from 150 to 1,395 feet in elevation. The range of this species includes

Riverside and San Diego Counties; and Baja California. This species is threatened by urbanization, road construction, vehicles, non-native plants, and illegal dumping (CNPS 2018).

San Diego goldenstar was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.10 Otay-lilac

Otay-lilac (*Ceanothus otayensis*) is a CRPR 1B.2 species and is believed to be a hybrid between two other species of native lilac, *C. crassifolius* and *C. greggii* var. *perplexans*. This perennial evergreen shrub blooms between January and April. It grows in metavolcanic or gabbroic soils in chaparral habitats from 1,800 to 3,300 feet in elevation. This species is only known in San Diego County and Baja California in the San Miguel and Otay mountains where this species is threatened by alteration of fire regimes, and possibly by Border Patrol activities (CNPS 2018).

Otay-lilac was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.11 Small-flower bindweed

Small-flower bindweed (*Convolvulus simulans*) is a CRPR 4.2 species. This annual herb blooms between March and July and grows in clay, serpentine soils in chaparral, coastal scrub, and valley and foothill grassland habitats from 90 to 2,220 feet in elevation. The range of this species includes Contra Costa, Fresno, Kern, Los Angeles, Orange, Riverside, Santa Barbara, San Benito, San Diego, San Joaquin, San Luis Obispo, and Stanislaus Counties; and San Clemente, Santa Catalina, and Santa Cruz Islands. This species is threatened by development and vehicles and possibly by non-native plants (CNPS 2018).

Small-flower bindweed was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.12 Otay tarplant

Otay tarplant (*Deinandra* [*Hemizonia*] *conjugens*) is a federal threatened, state endangered, CRPR 1B.1, and NCCP-covered species. This annual herb flowers between May and June and grows in clay soils in coastal scrub, and valley and foothills grassland habitats between 75 and 900 feet. This species is only known in San Diego County and Baja California where it is threatened by development, agriculture, vehicles, illegal dumping, foot traffic, non-native plants, habitat disturbance, and Border Patrol activities. Possibly threatened by landfill construction (CNPS 2018).

Otay tarplant was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.13 Orcutt's bird's-beak

Orcutt's bird's-beak (*Dicranostegia orcuttiana*) is a CRPR 2B.1 species. This hemiparasitic annual herb blooms between April and July. It grows in coastal scrub habitats from 30 to 1,050 feet in elevation. This species is only known in San Diego County and Baja California where this species is seriously threatened by urbanization and by trail widening and non-native plants (CNPS 2018).

Orcutt's bird's-beak was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.14 Variegated dudleya

Variegated dudleya (*Dudleya variegata*) is a CRPR 1B.2 and NCCP-covered species. This perennial herb blooms from April through June. This species grows in heavy clay soils within chaparral, cismontane woodland, coastal scrub, valley and foothill grassland, and vernal pool habitats at elevations between 10 and 1,900 feet in elevation. This species is threatened by development and grazing and possibly threatened by competition with non-native plants (CNPS 2018).

Variegated dudleya was only observed within the BSA during the 2015 survey effort and not observed in 2018. It is included in Table 3 and with specific locations shown on Appendix C.

4.1.15 San Diego button-celery

San Diego button-celery (*Eryngium aristulatum* var. *parishii*) is a federal and state endangered, CRPR 1B.1, NCCP-covered species. This annual (sometimes biennial or perennial) herb blooms between April and June. It grows in disturbed areas in mesic soils in coastal scrub, valley and foothill grassland, and vernal pool habitats from 60 to 1,860 feet in elevation. The range of this species includes Los Angeles, Orange, Riverside, and San Diego Counties. This species is threatened by agriculture, urbanization, road maintenance, grazing, vehicles, illegal dumping, non-native plants, and foot traffic (CNPS 2018).

San Diego button-celery was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.16 Cliff spurge

Cliff spurge (*Euphorbia misera*) is a CRPR 2B.2 species. This perennial shrub blooms between December and August. It grows on rocky soils in coastal bluff scrub, coastal scrub, and Mojavean desert scrub habitats from 30 to 1,500 feet in elevation. The range of this species includes Los Angeles, Orange, Riverside, San Diego, and Santa Barbara Counties; San Clemente, Santa Catalina, and Santa Cruz Islands; and Baja California and Guadalupe Island. This species is threatened by development and non-native plants (CNPS 2018).

Cliff spurge was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.17 Coast barrel cactus

Coast barrel cactus (*Ferocactus viridescens*) is a CRPR 2B.1, NCCP-covered species. This perennial stem succulent flowers between May and June. It grows in chaparral, coastal scrub, and valley and foothill grassland habitats at elevations up to 1,500 feet. This species is only found in southwestern San Diego County and Baja California where it is threatened by urbanization, vehicles, horticultural collecting, agriculture and non-native plants (CNPS 2018).

Coast barrel cactus was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.18 <u>Tecate cypress</u>

Tecate cypress (*Hesperocyparis forbesii*) is a CRPR 1B.1, NCCP-covered species. This perennial evergreen tree produces pollen/cones in April and grows in clay, gabbroic or metavolcanic soils in closed-cone coniferous forest and chaparral habitats from 240 to 4,500 feet in elevation. The range of this species includes Orange, Riverside, and San Diego Counties; and Baja California. This species is threatened by alteration of fire regimes, mining, and development (CNPS 2018).

Tecate cypress was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.19 Graceful tarplant

Graceful tarplant (*Holocarpha virgata* subsp. *elongata*) is a CRPR 4.2 species. This annual herb blooms between May to November and grows in chaparral, cismontane woodland, coastal scrub, and valley and foothill grassland habitats from 180 to 3,300 feet in elevation. The range of this species includes Orange, Riverside, and San Diego Counties where it is threatened by development (CNPS 2018).

Graceful tarplant was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.20 Decumbent goldenbush

Decumbent goldenbush (*Isocoma menziesii* var. *decumbens*) is a CRPR 1B.2 species. This perennial shrub blooms between April and November. It grows in disturbed areas in sandy soils in chaparral and coastal scrub habitats from 30 to 405 feet in elevation. The range of this species includes Los Angeles, Orange, and San Diego Counties; and San Clemente and Santa Catalina Islands. This species is threatened by development and non-native plants (CNPS 2018).

Decumbent goldenbush was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.21 San Diego marsh-elder

San Diego marsh-elder (*Iva hayesiana*) is a CRPR 2B.2 species. This subshrub flowers between April and October. It grows in marsh, swamp, and playa habitats from 30 to 1,500 feet in elevation. This species is only known in San Diego County and Baja California where it is threatened by waterway channelization, coastal development, vehicles, and non-native plants (CNPS 2018).

San Diego marsh-elder was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.22 <u>Southwestern spiny rush</u>

Southwestern spiny rush (*Juncus acutus* subsp. *leopoldii*) is a CRPR 4.2 species. This perennial rhizomatous herb blooms between May and June and grows in mesic soils in coastal dune, meadow and alkaline seep, and marsh and swamp habitats from 9 to 1,800 feet in elevation. The range of this species includes Los Angeles, Orange, Santa Barbara, San Diego, San Luis Obispo, and Ventura Counties; as well as in Arizona,

Baja California, Georgia, Nevada, and South America. This species is threatened by urbanization and flood control (CNPS 2018).

Southwestern spiny rush was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.23 Little mousetail

Little mousetail (*Myosurus minimus* subsp. *apus*) is a CRPR 3.1, NCCP-covered species. This annual herb blooms between March and June. It grows in valley and foothill grassland, alkaline vernal pool, wet field, streambank, and lake shore habitats from 60 to 1,920 feet in elevation. The range of this species includes Alameda, Contra Costa, Colusa, Lake, Merced, Riverside, San Bernardino, San Diego, Solano, Tulare, Yolo Counties. This species is reduced by vernal pool habitat loss; threatened by vehicles, grazing, development, and agriculture (CNPS 2018).

Little mousetail was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.24 Palmer's grapplinghook

Palmer's grapplinghook (*Harpagonella palmeri*) is a CRPR 4.2 and NCCP-covered species. This annual herb blooms between March and May. It is typically found in clay soils in open areas within chaparral, coastal scrub, and valley and foothill grasslands at elevations less than 3,000 feet (CNPS 2018).

Palmer's grapplinghook was observed within the BSA during the 2014 survey effort and not observed in 2018. It is included in Table 3 and with specific locations shown on Appendix C.

4.1.25 Small-leaf rose

Small-leaf rose (*Rosa minutifolia*) is a state listed as endangered, CRPR 2B.1, and an NCCP-covered species. This perennial deciduous shrub blooms between January and June and grows in chaparral and coastal scrub habitats from 450 to 480 feet in elevation. There is only one known occurrence outside Baja California, located in Otay Mesa, San Diego County, transplanted in 1997 for mitigation. The species is threatened by development, motorized vehicles, and non-native plants (CNPS 2018).

Small-leaved rose was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.26 <u>Munz's sage</u>

Munz's sage (*Salvia munzii*) is a CRPR 2B.2 species. This perennial evergreen shrub blooms between February and April. It grows in chaparral and coastal scrub habitats from 345 to 3,195 feet in elevation. This species is only known in San Diego County and Baja California where this species is threatened by development, and possibly by non-native plants and illegal dumping (CNPS 2018).

Munz's sage was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.1.27 Mesa spike-moss

Mesa spike-moss (*Selaginella cinerascens*) is a CRPR 4.1 species. This perennial rhizomatous fern produces cones with reproductive spores during winter rains. It grows in red clay soils in chaparral and coastal scrub habitats from 60 to 1,920 feet in elevation. The range of this species includes Orange, Riverside, and San Diego Counties where it is threatened by development (CNPS 2018).

Mesa spike-moss was observed growing within the BSA as documented in Table 3 and with specific locations shown on Appendix C.

4.2 PROJECT AVOIDANCE AND MINIMIZATION MEASURES

Multiple proposed work areas (e.g., poles, string sites) are within close proximity to mapped points or polygons of special-status plant species. These include:

- Page 4: Pole Location 7 2014 results for *Convolvulus simulans* (CRPR 4.2)
- Page 5: Pole Location 15 2018 results for *Bahiopsis laciniata* (CRPR 4.2)
- Page 10: Pole Location 43 2018 results for Ambrosia monogyra (CRPR 2B.2)
- Page 11: Pole Location 46 2014 results for Ambrosia monogyra (CRPR 2B.2)
- Page 13: Pole Location 58 2014 results for Ambrosia monogyra (CRPR 2B.2), 2018 results for Bahiopsis laciniata (CRPR 4.2)
- Page 15: Pole Location 66 2018 results for *Bahiopsis laciniata* (CRPR 4.2)
- Page 16: Pole Location 69 2018 results for Holocarpha virgata subsp. elongata (CRPR 4.2)
- Page 17: Pole Location 71G and 70 2014 results for Salvia munzii (CRPR 2B.2)
- Page 18: Pole Location 77 2014 results for *Iva hayesiana* (CRPR 2B.2)
- Page 23: Pole Locations 97, 97.1, 98, 99, SS23, SS24 2014 results for Bahiopsis laciniata (CRPR 4.2)
- Page 24: Pole Location 103, SS25 New Restoration Area, 2018 results for Bahiopsis laciniata (CRPR 4.2), Deinandra conjugens (CRPR 1B.1), Isocoma menziesii var. decumbens (CRPR 1B.1)

Of these 11 identified work locations, only 6 are within close proximity to special-status plant species as identified as CRPR 1 and 2 species, and have been underlined above. Of these locations, only Otay tarplant (*Deinandra conjugens*) is a federal-listed threatened, state-listed endangered species and NCCP-covered species. This species is located within a New Caltrans Restoration Area. The string site SS25 will be modified and work activities will be contained within the existing access road. The limits of the stringing site will be flagged for avoidance; therefore, no impacts to this species or the restoration area are anticipated.

No other federal- or state-listed plant species were found within the proposed project impact areas. SDG&E plans to conduct additional pre-construction surveys, to monitor all construction activities within habitat, and to conduct a post-construction survey and prepare a report. If Otay tarplant is observed within the impact area at any time, and it is determined that impacts to Otay tarplant are unavoidable and occur during the proposed project, SDG&E will rely on the NCCP and will deduct credits from the NCCP impact and mitigation banks. If upon project completion, Otay tarplant has not been impacted, SDG&E will deduct credits from the LE-HCP impact and mitigation banks.

SDG&E's NCCP Operational Protocols will apply to all special-status plant species. Consistent with NCCP Operational Protocol 14 and BIO-5 of the MMRP, locations of special-status plants to be avoided will be flagged during construction. Additional NCCP Operational Protocols that will minimize inadvertent damage and destruction of special-status plants include restricting vehicles to existing roads when feasible, minimizing impacts by defining the disturbance areas, providing biological monitoring to assist crews in avoiding and minimizing impacts at sites with the potential for direct impacts, and designing the construction activities to avoid or minimize new disturbance and erosion. As such, impacts to special-status plant species are expected to be less-than-significant with the implementation of the NCCP Operational Protocols.

If avoidance of *Ambrosia monogyra* (CRPR 2B.2; pole location 43, 46, and 58), *Salvia munzii* (CRPR 2B.2; pole locations 71G and 70), *Iva hayesiana* (CRPR 2B.2; pole location 77), and *Isocoma menziesii* var. *decumbens* (CRPR 1B.1; pole location 103 and SS25) is not feasible, SDG&E shall implement MMRP measure BIO-6 to compensate for impacts on special-status plant species, as these plants are not NCCP or LE-HCP covered species. Where impacts to these special-status plant species are unavoidable, the impact shall be quantified and compensated through mitigation consistent with the measures established in the SDG&E LE-HCP and/or NCCP. Where salvage and relocation are demonstrated to be feasible and biologically preferred by the resource agencies, it shall be conducted pursuant to a CPUC- and CDFW-approved salvage and relocation plan that details the methods for salvage, stockpiling, and replanting, as well as the characteristics of the receiver sites. The salvage and relocation plan shall also define the monitoring strategy with a minimum of annual monitoring for five years or until success criteria are met. If the salvage and relocation fail to meet the established success criteria after five years, maintenance and monitoring shall extend beyond the five-year period until the criteria are met, or unless otherwise approved by the CPUC.

SECTION 5.0 – CONCLUSIONS

A total of 27 special-status plant species were observed within the BSA during the 2014 and 2018 surveys (Table 3) including 3 federal- and/or state-listed as endangered species and 16 additional species that are only designated as CRPR 1 or 2 species and which are considered special-status species. Plants with a rare plant rank of 1 and 2, in general, must comply with CEQA Guidelines Section 15380(b) criteria, and adverse effects to these species may be considered significant. Impacts to the 8 plant species that have a rare plant rank of 3 or 4 are also considered during CEQA review, although because these species are typically not as rare as those with ranks of 1 or 2, impacts to them are less frequently considered potentially significant. Impacts to species with a rare plant rank of 3 or 4 will be avoided to the greatest extent possible; however, as per BIO-6, no mitigation is required for impacts specifically to these plant species.

No impacts to the federal- or state-listed plants are anticipated. The following four special-status plant species with a rare plant rank of 1 or 2: *Ambrosia monogyra* (CRPR 2B.2), *Salvia munzii* (CRPR 2B.2), *Iva hayesiana* (CRPR 2B.2), and *Isocoma menziesii* var. *decumbens* (CRPR 1B.1) are within or in close proximity to work areas. No other special-status plant species were observed to occur within or in close proximity to work areas. All efforts will be made to avoid individual special-status plants as possible during Project activities. SDG&E's NCCP Operational Protocols will apply to all special-status plant species. Consistent with NCCP Operational Protocol 14 and BIO-5 of the MMRP, locations of special-status plants to be avoided will be flagged during construction, and biological monitoring will be necessary during ground-disturbing activities in the areas known to contain special-status plant species.

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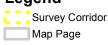
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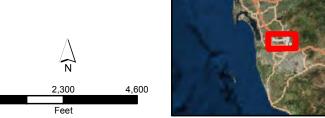
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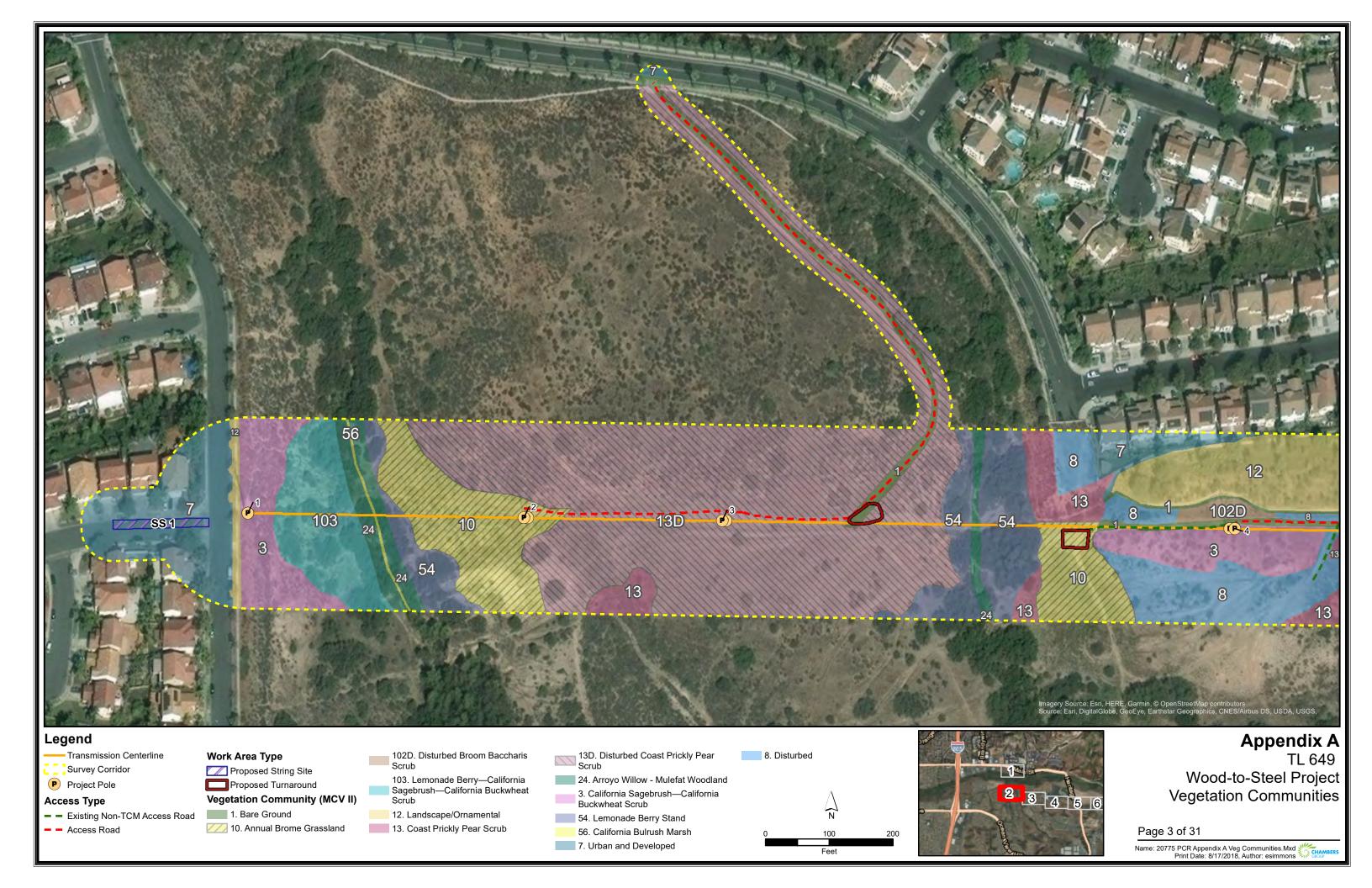
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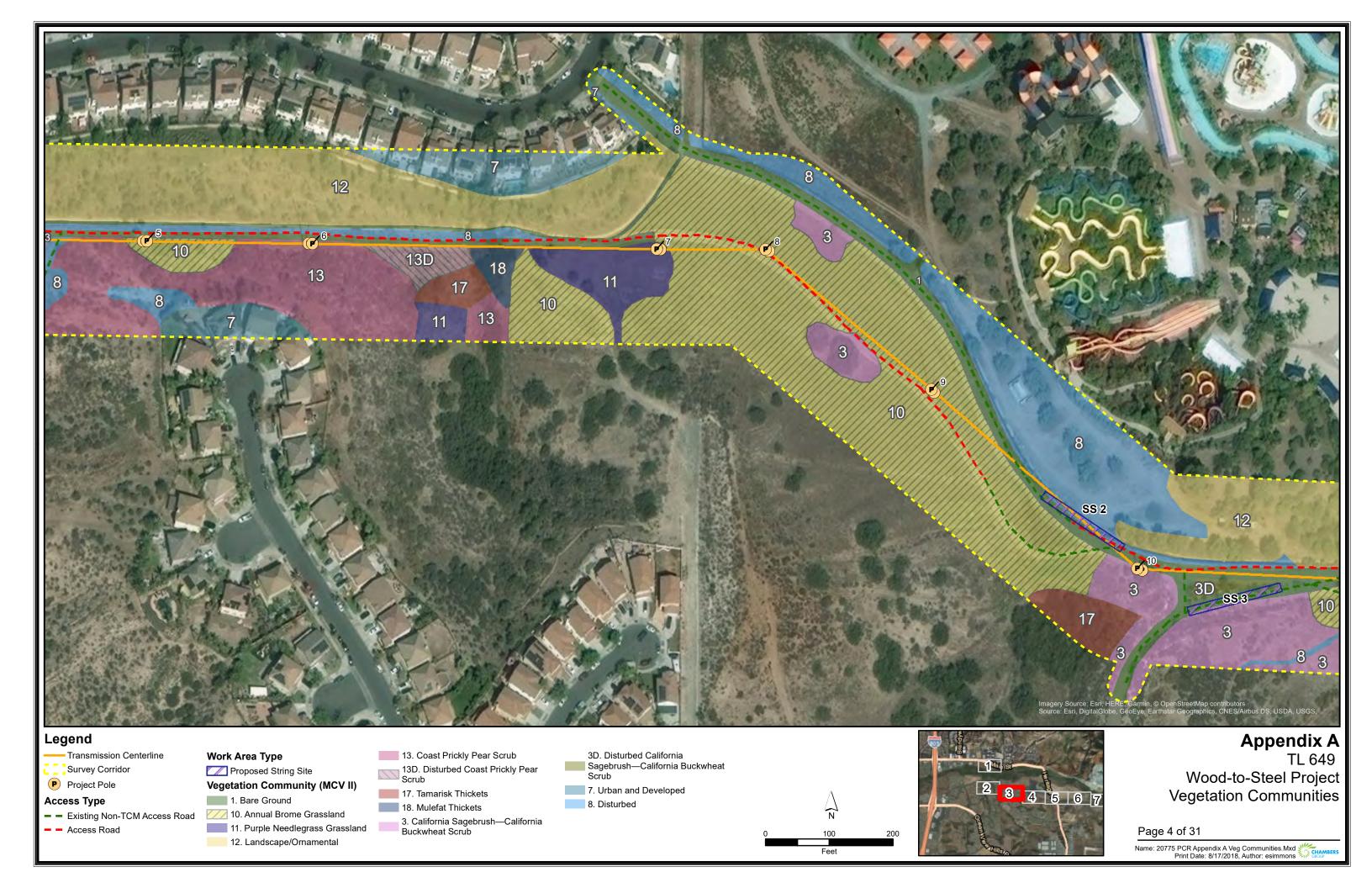


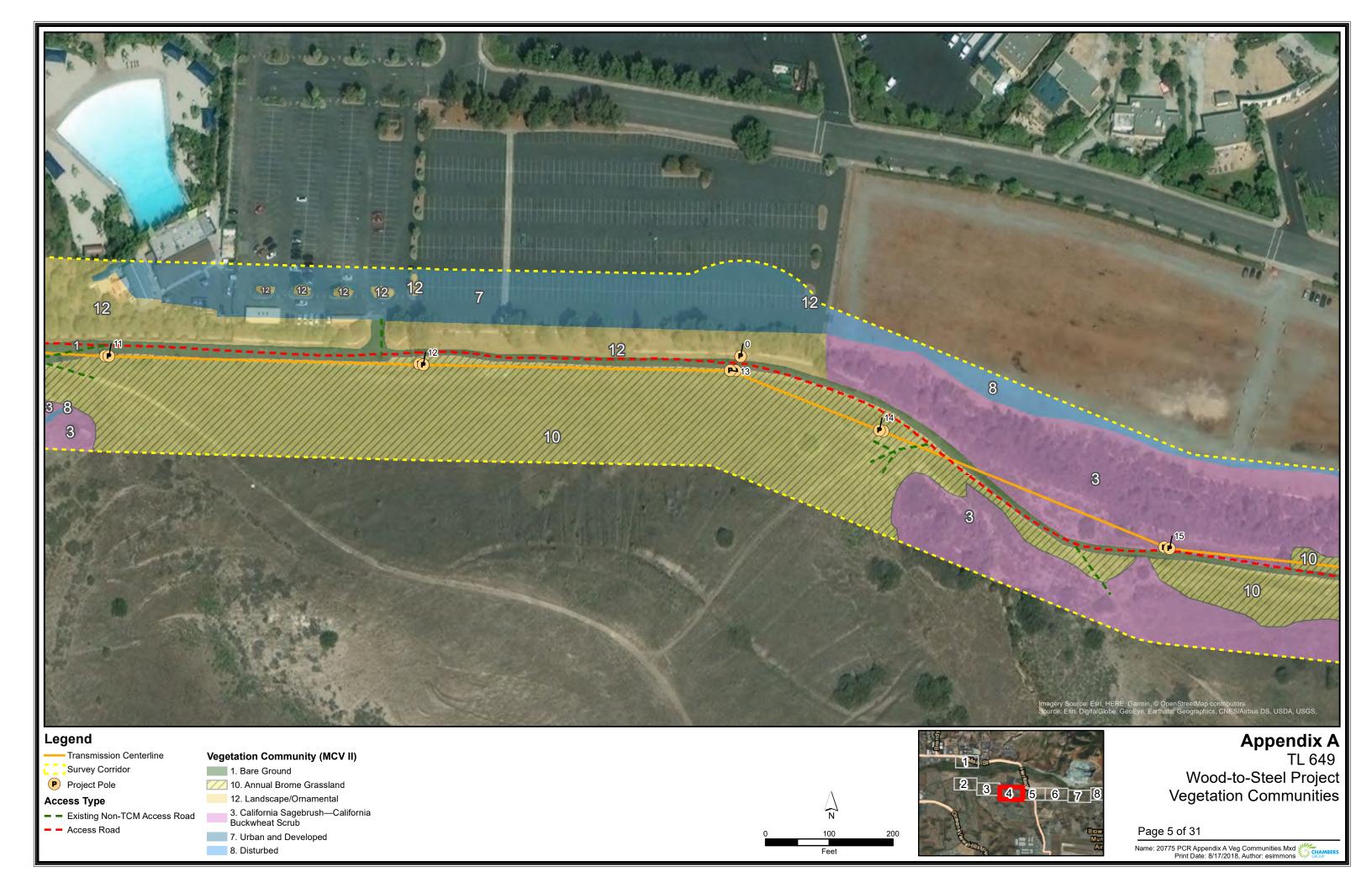
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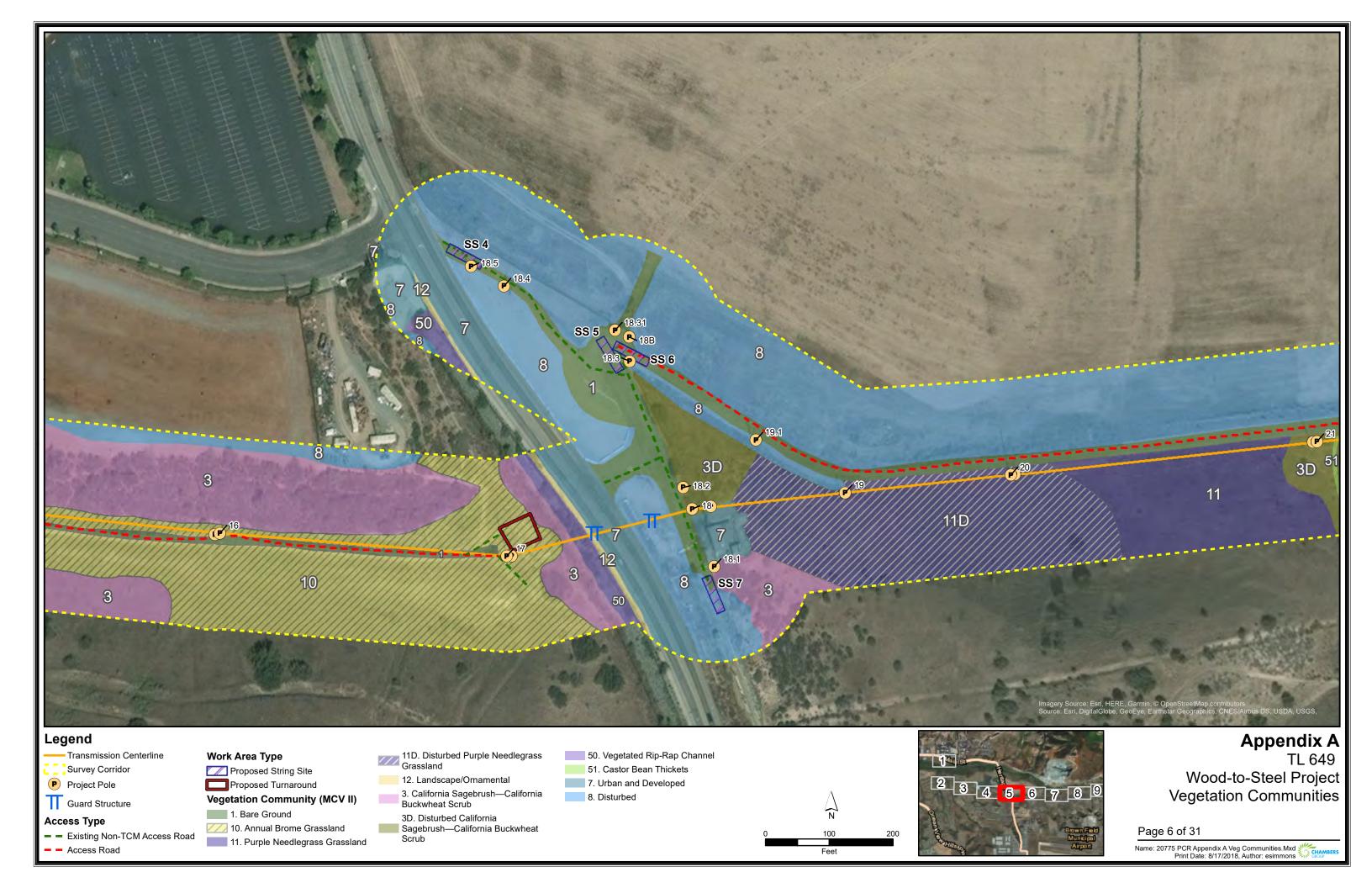
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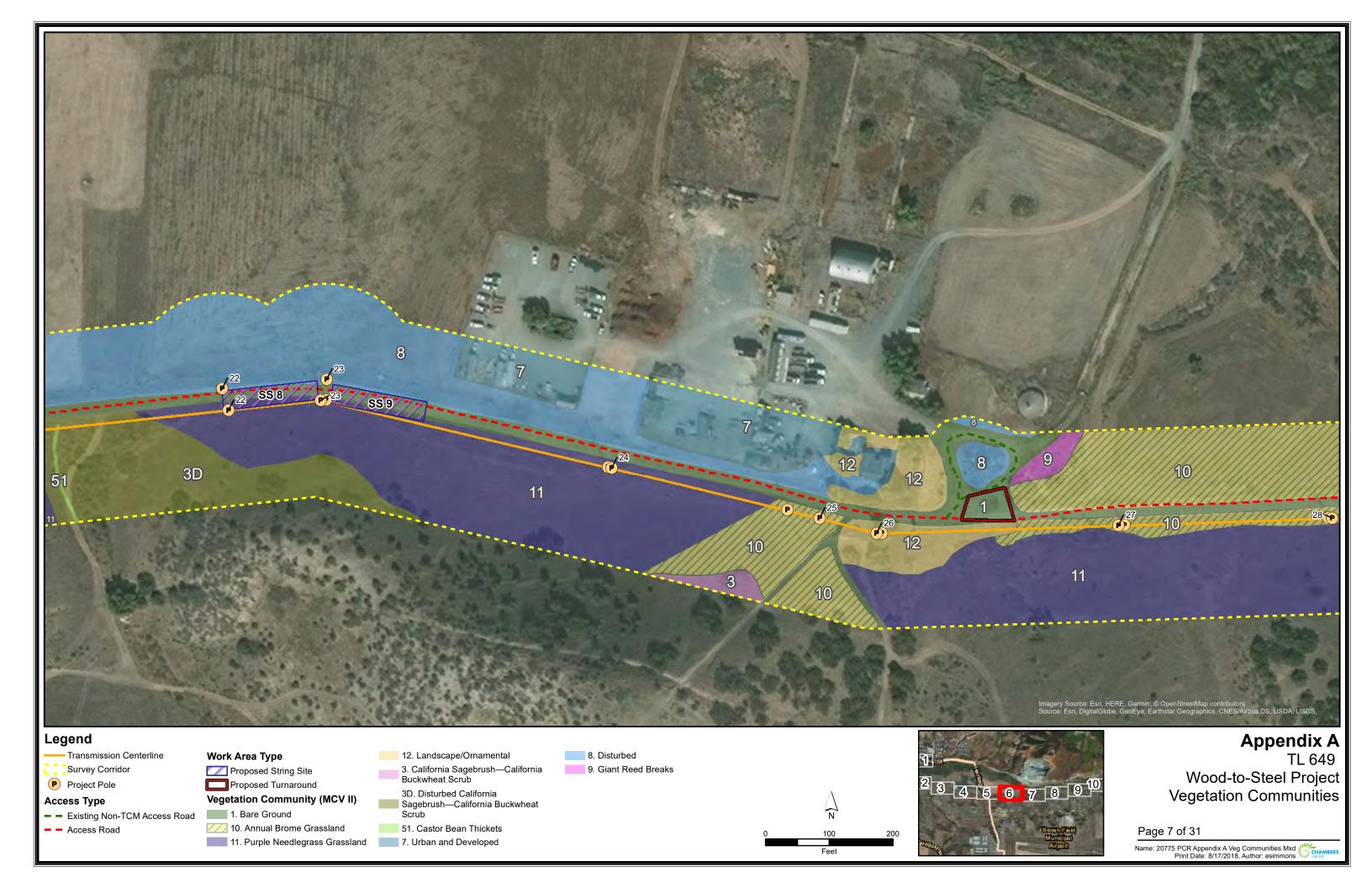
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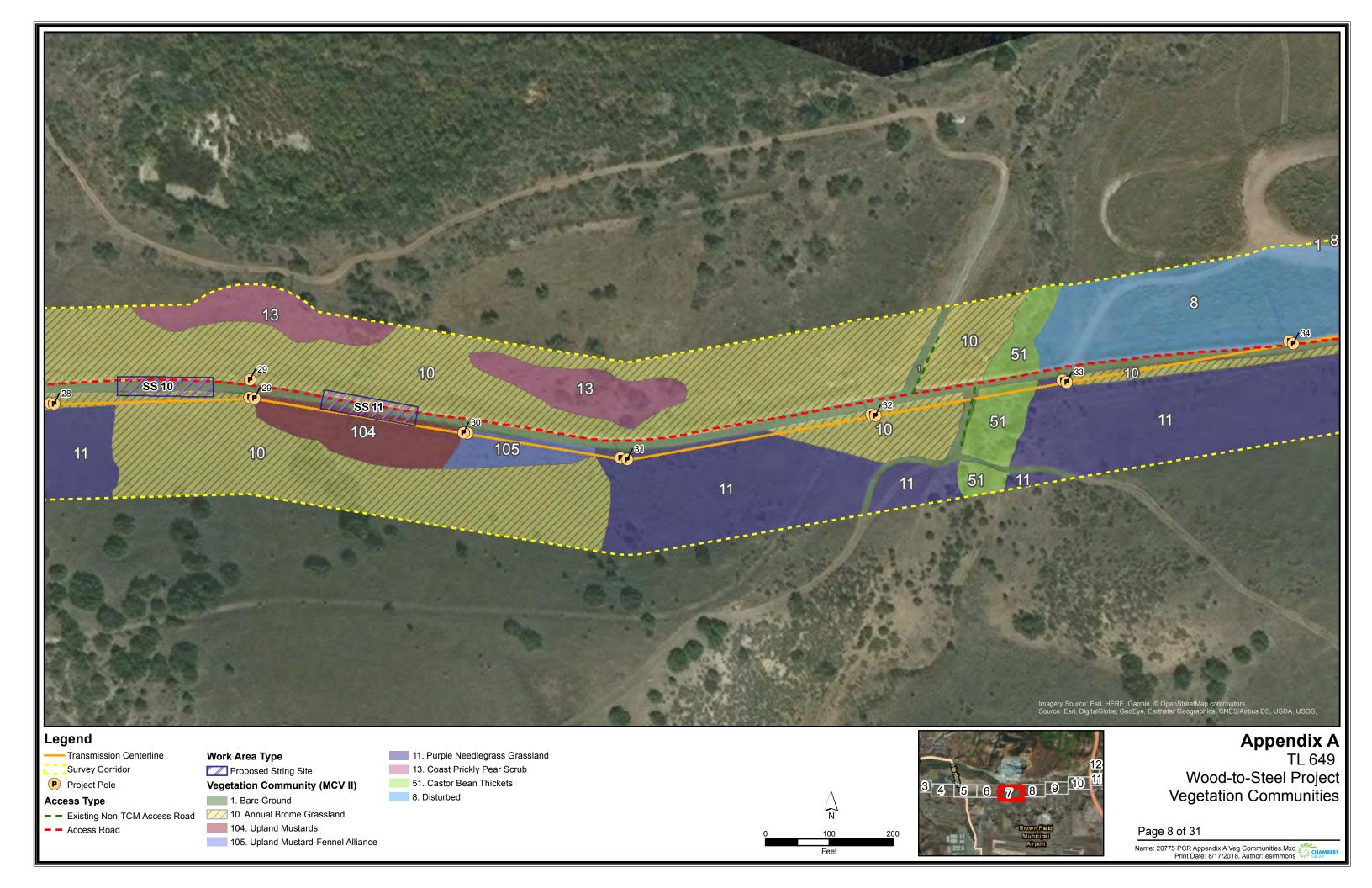


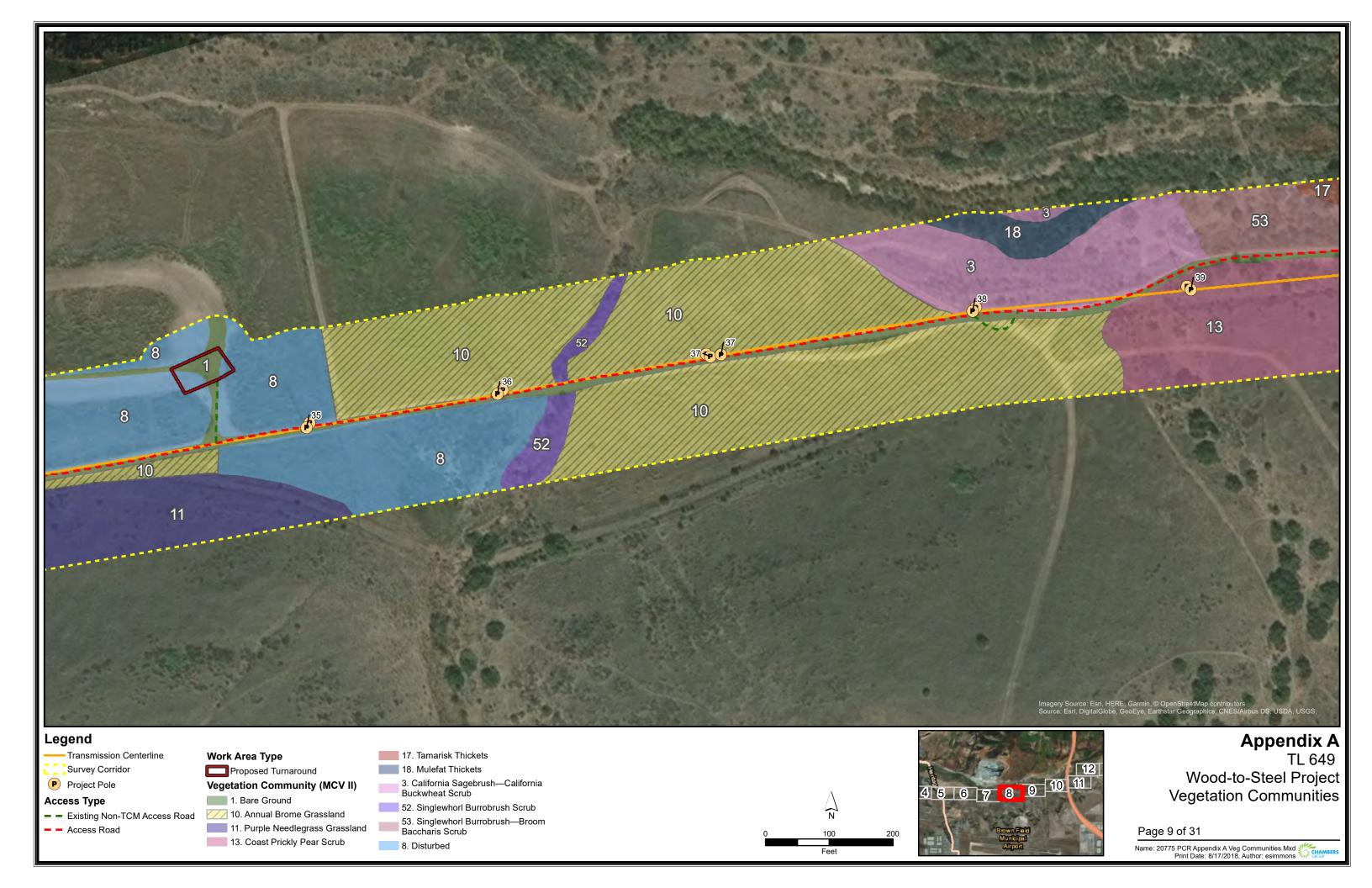


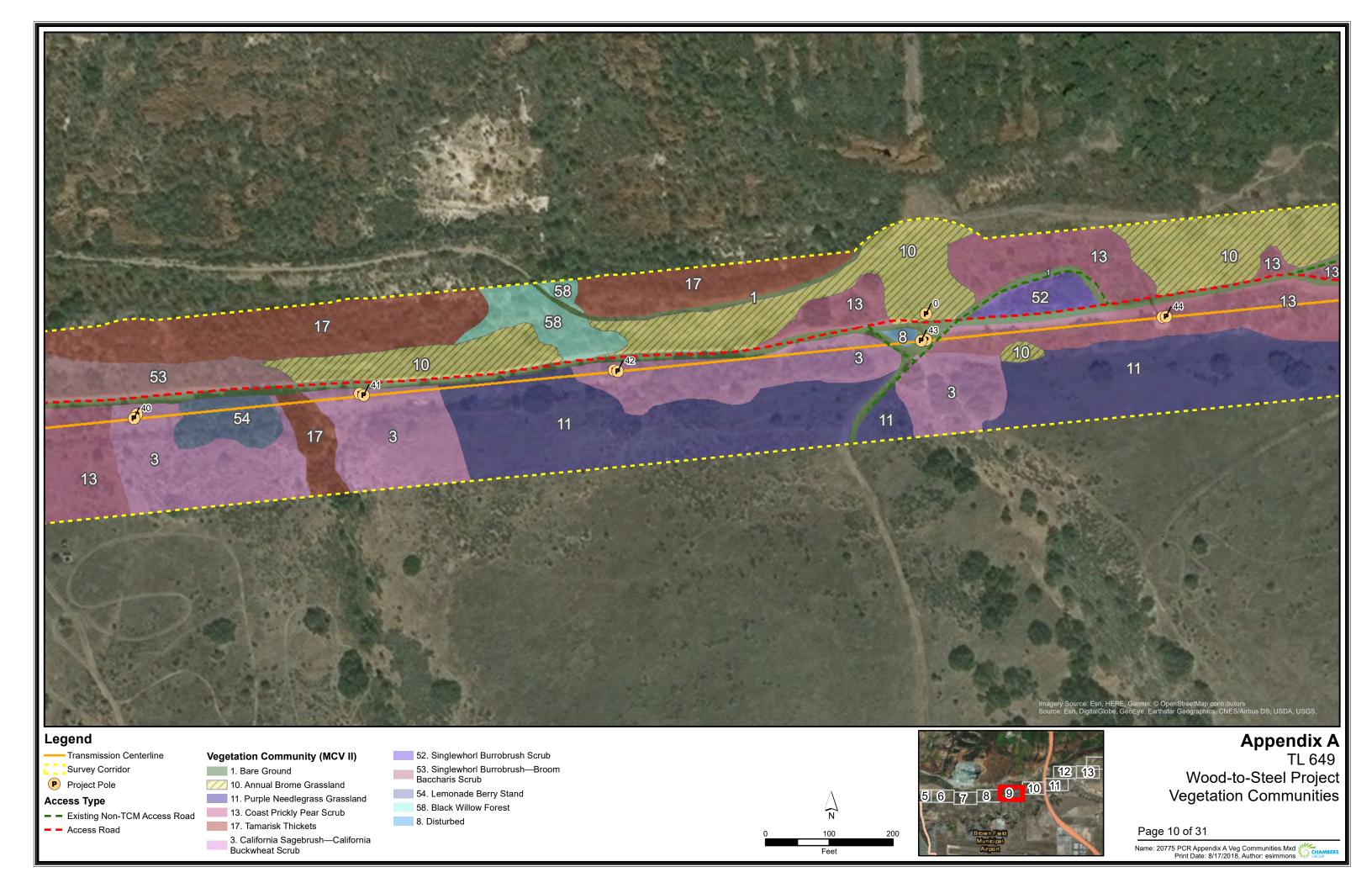


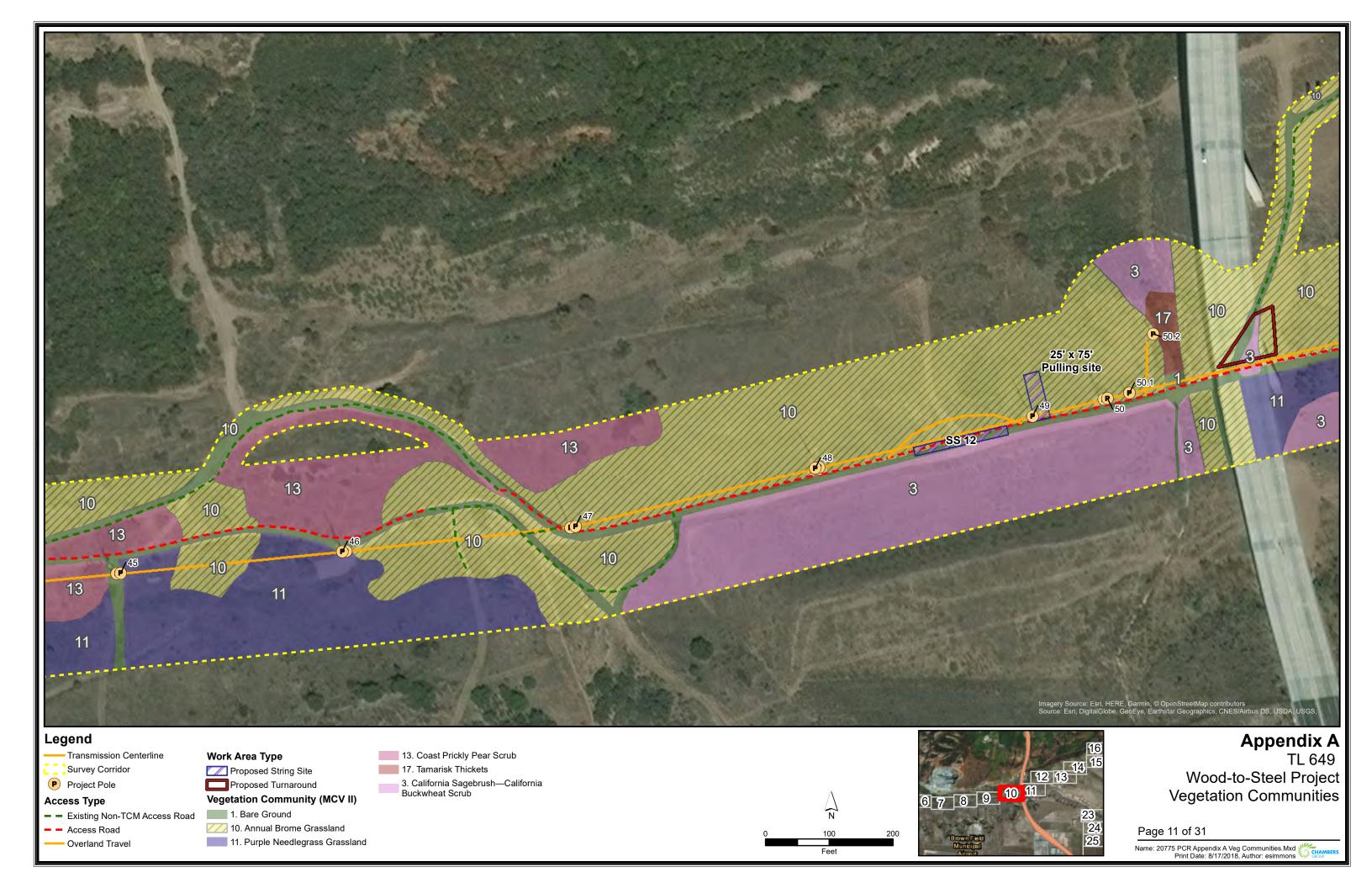


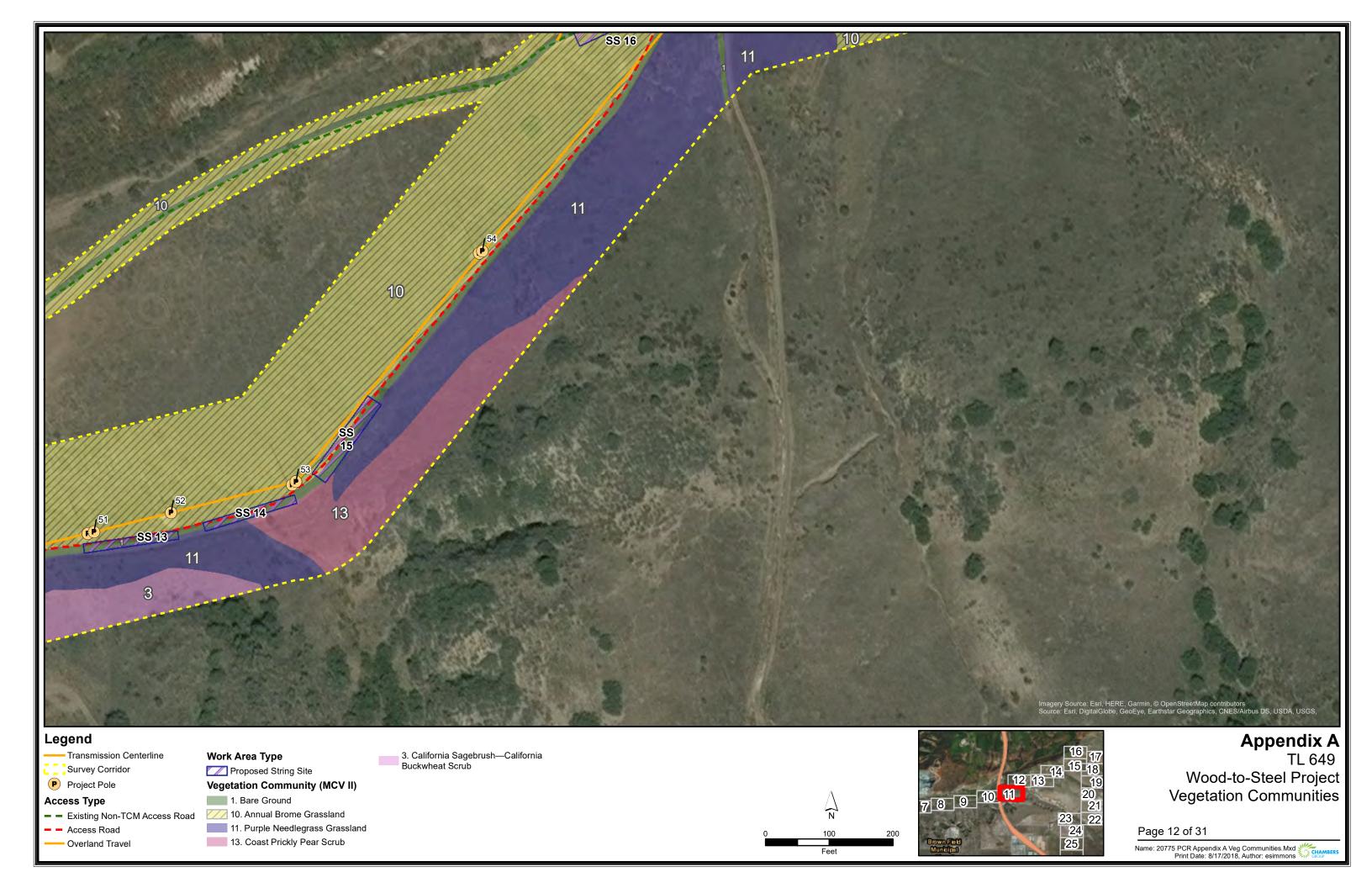


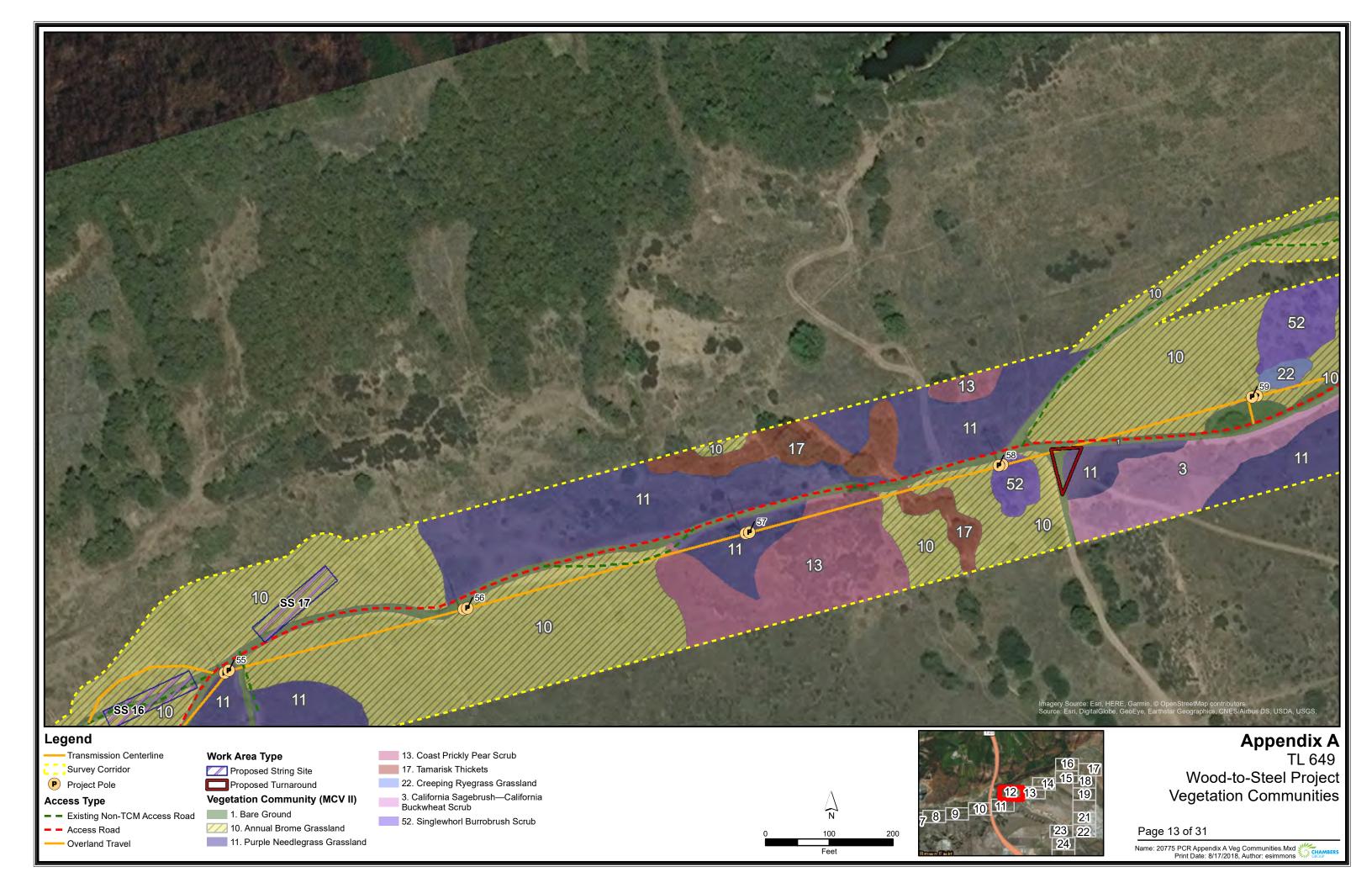


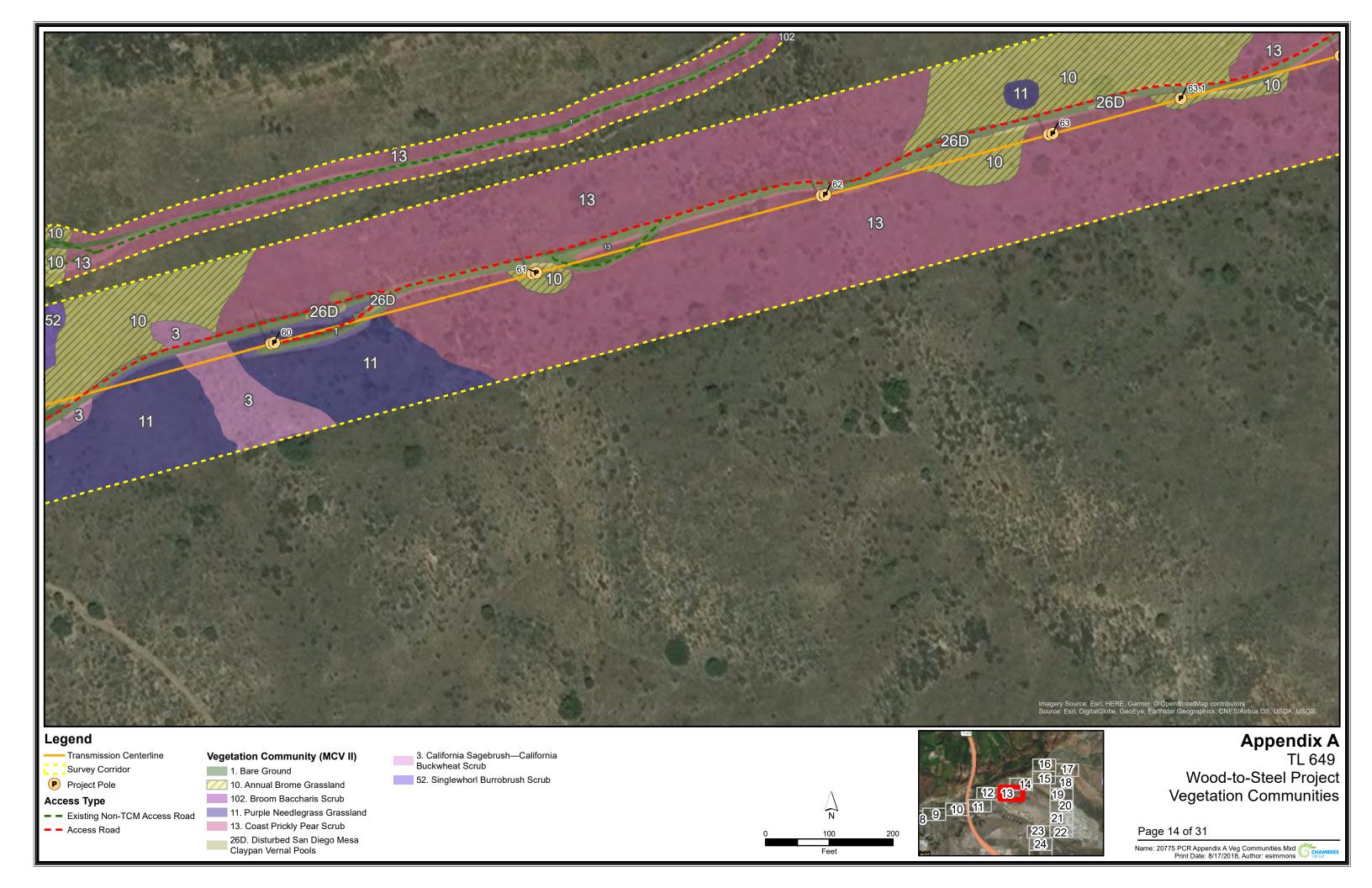


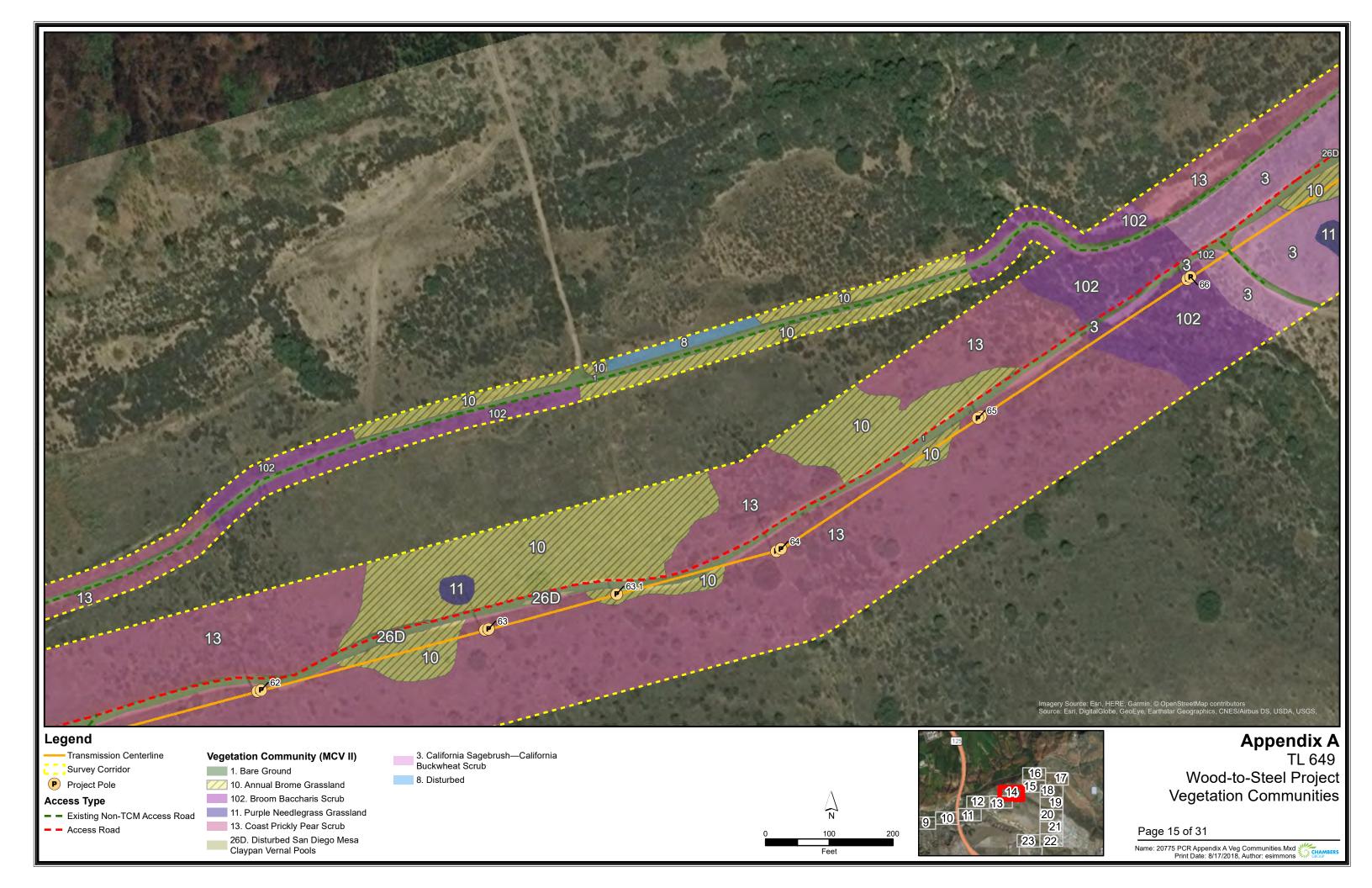


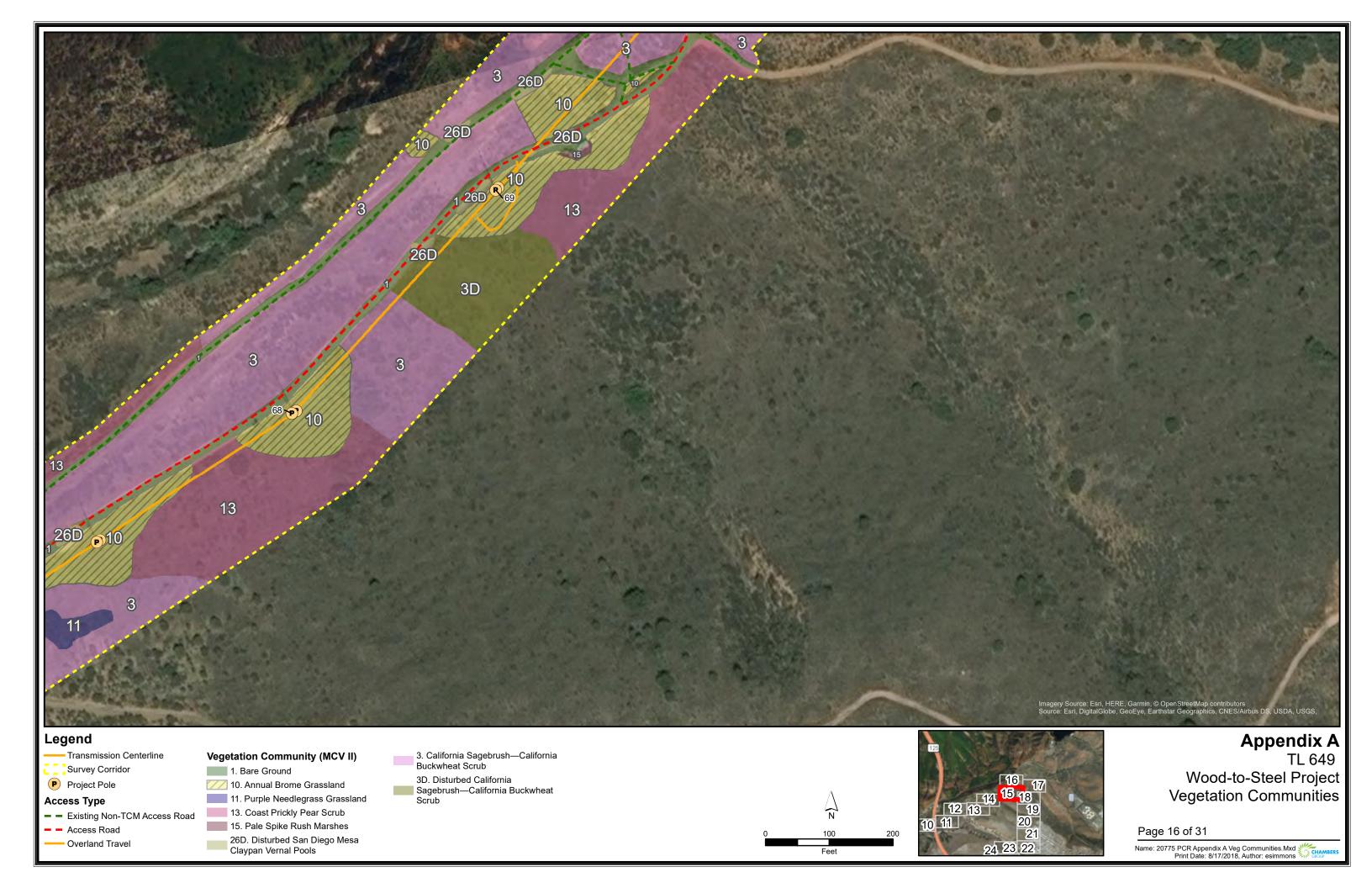


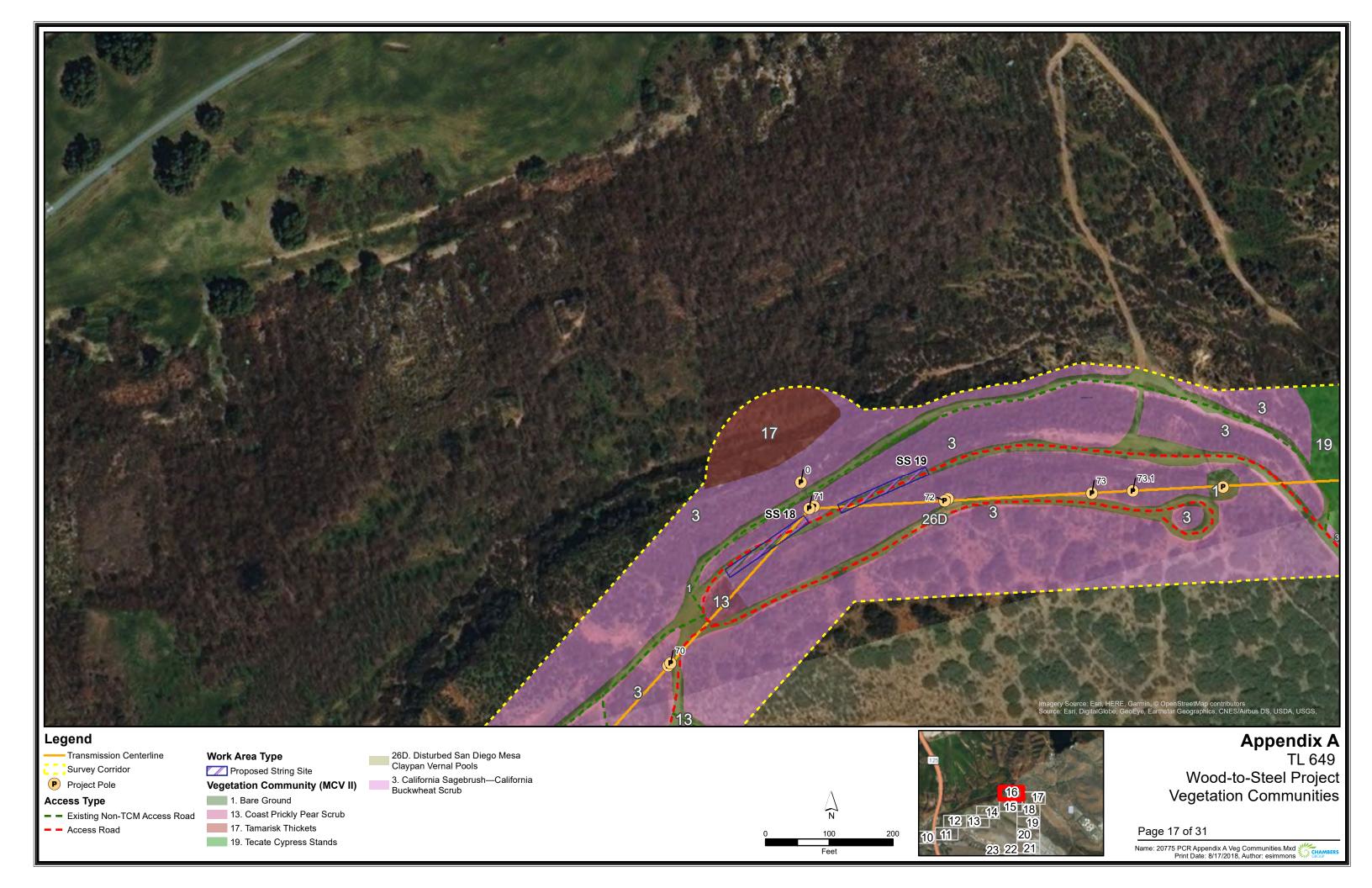


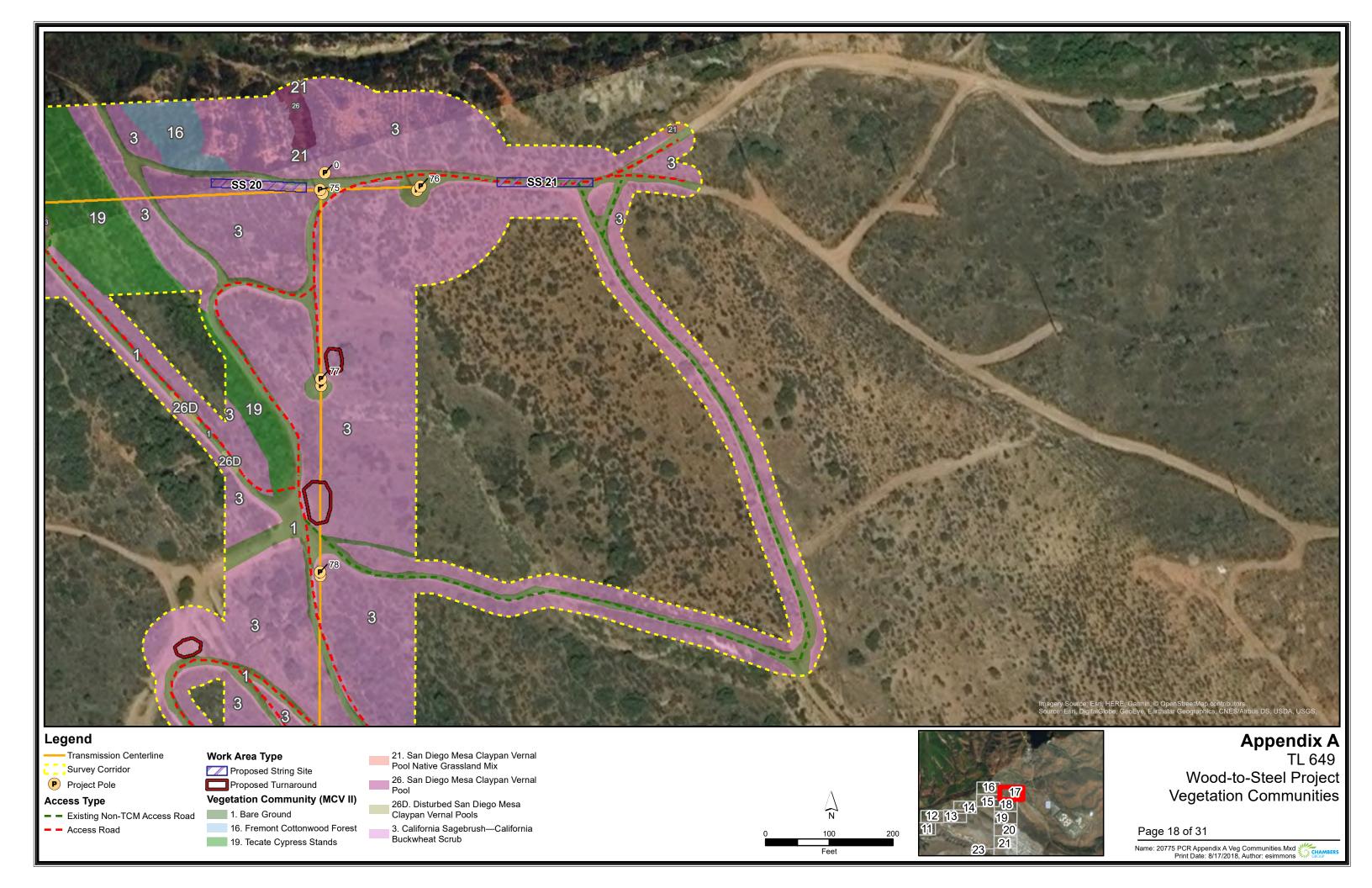


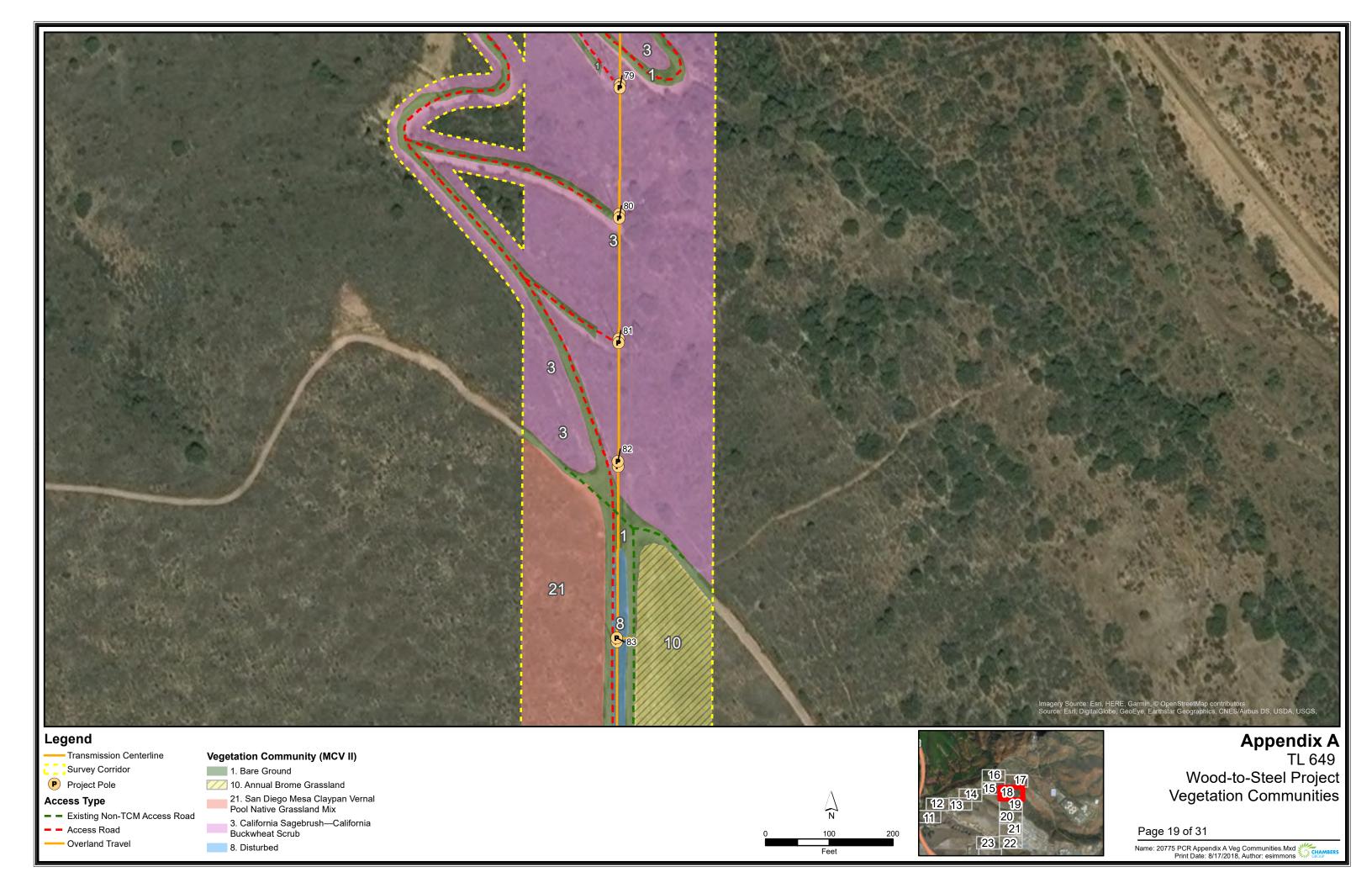


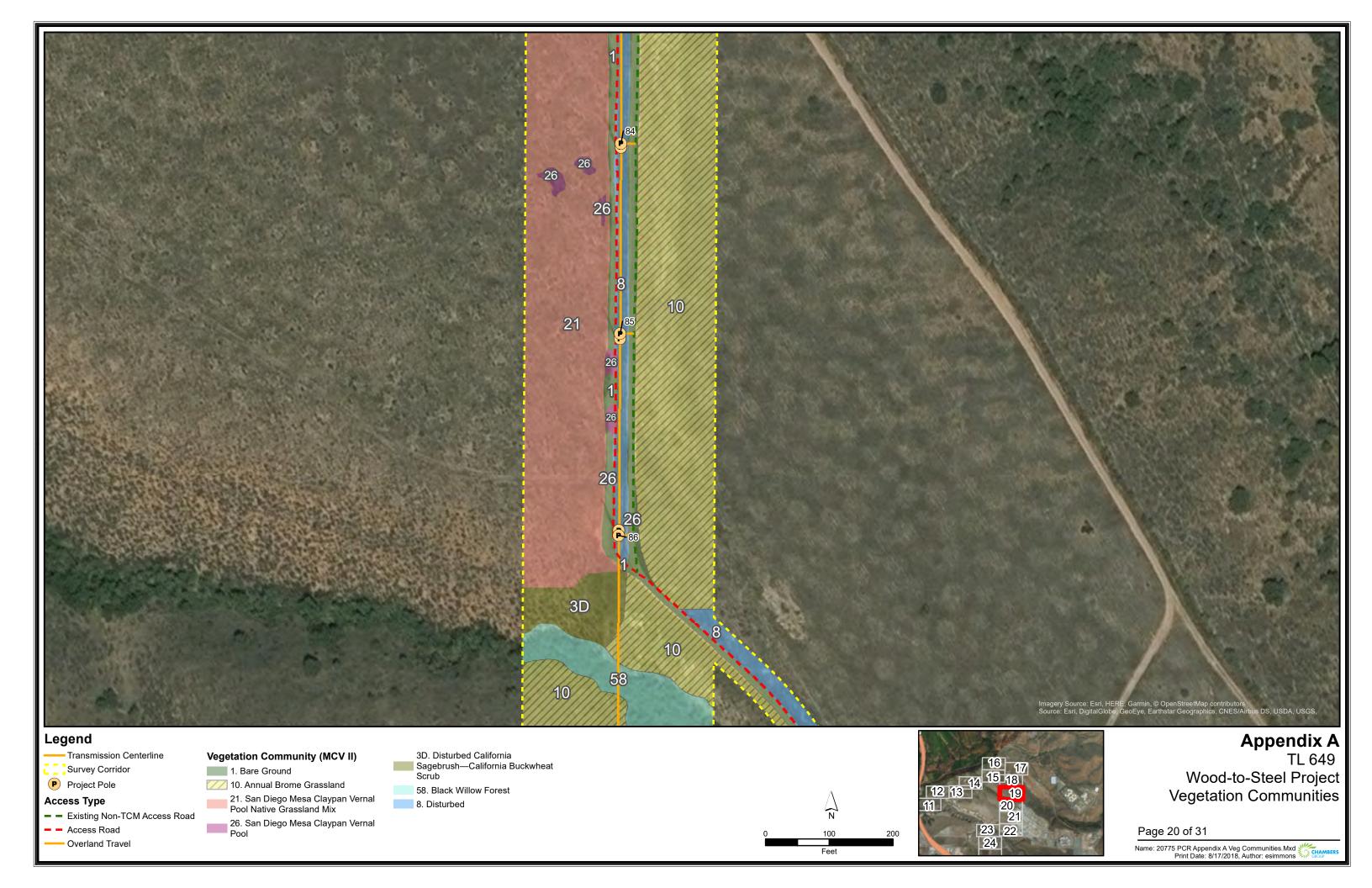


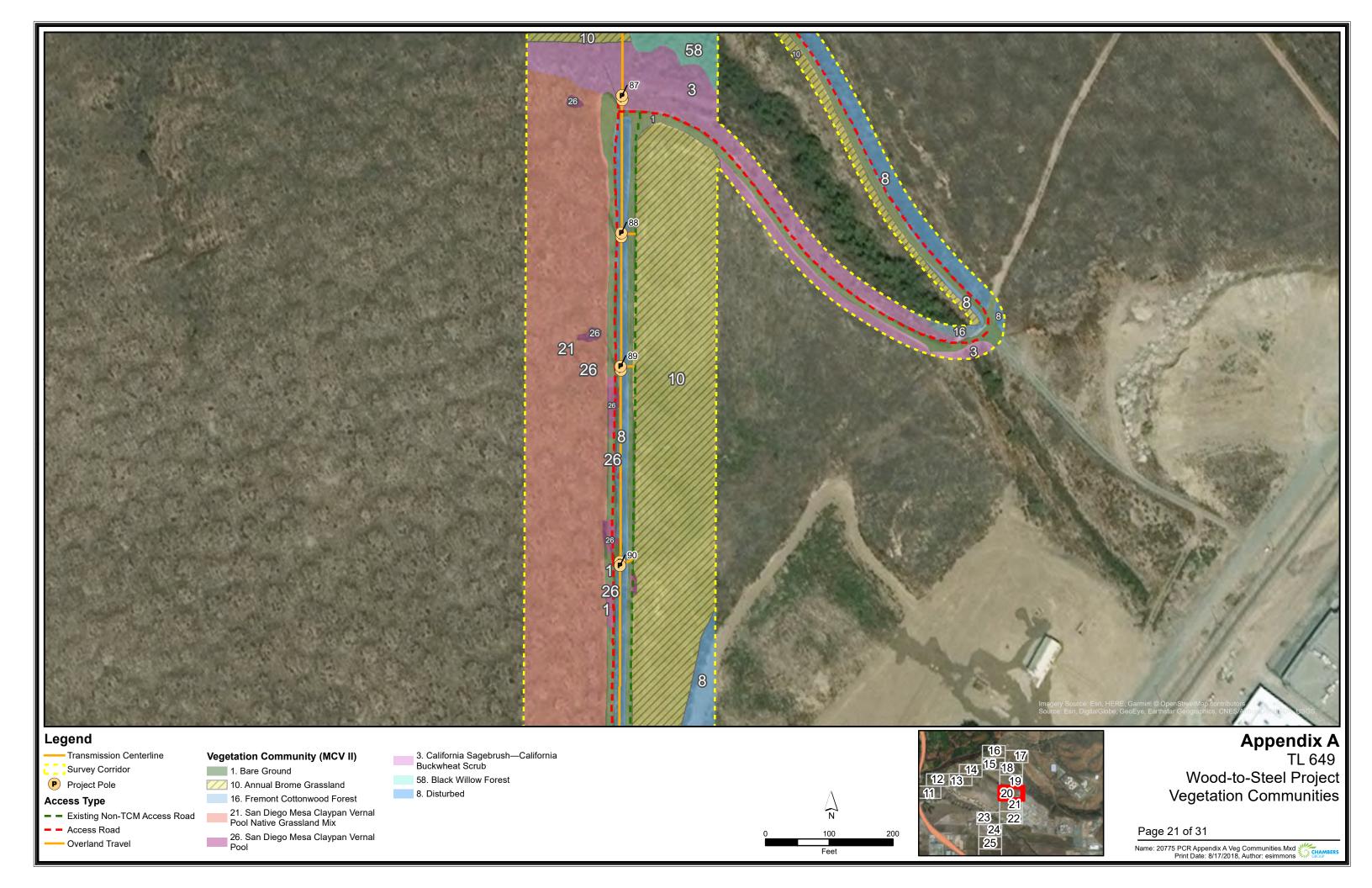


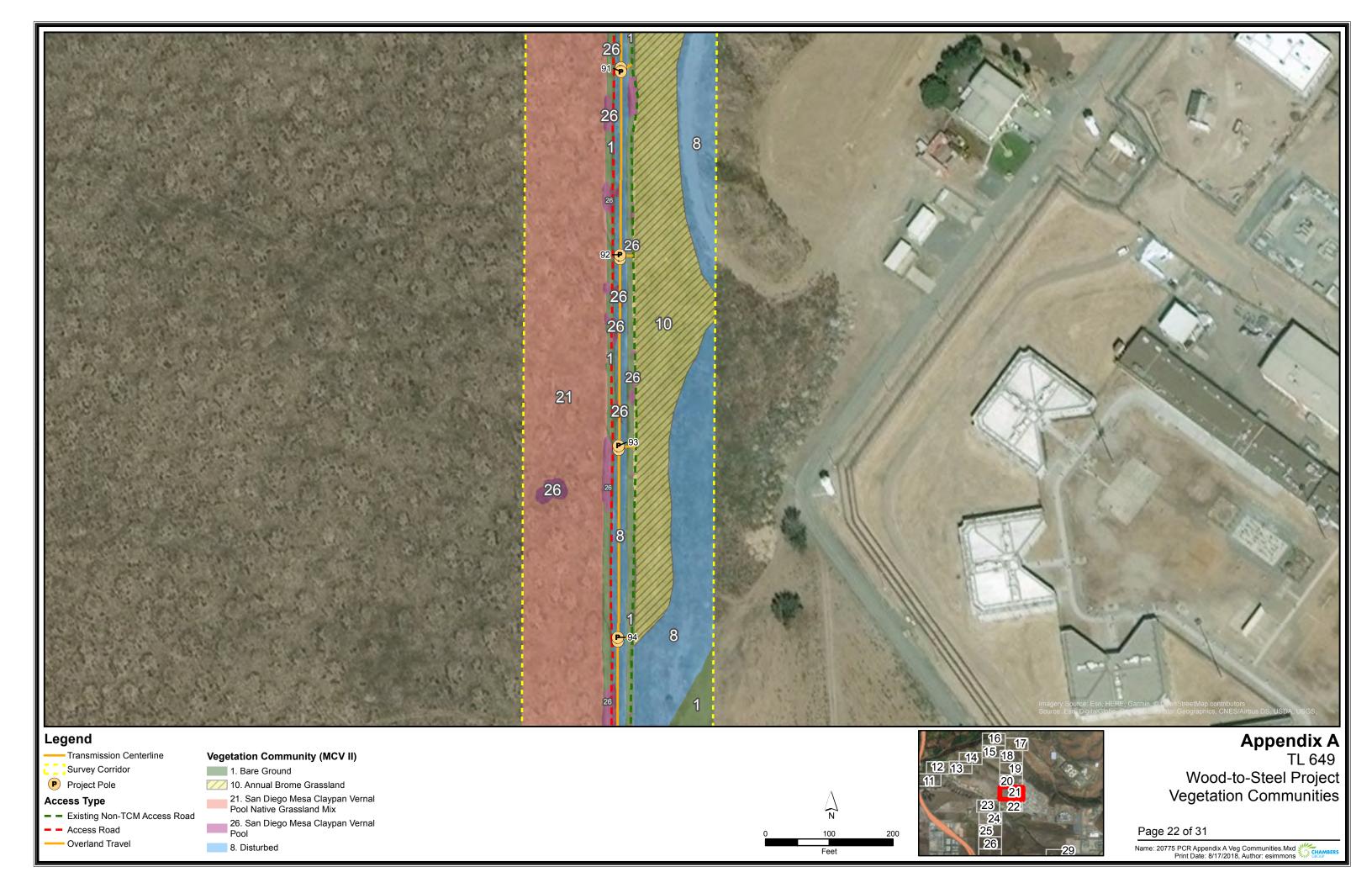


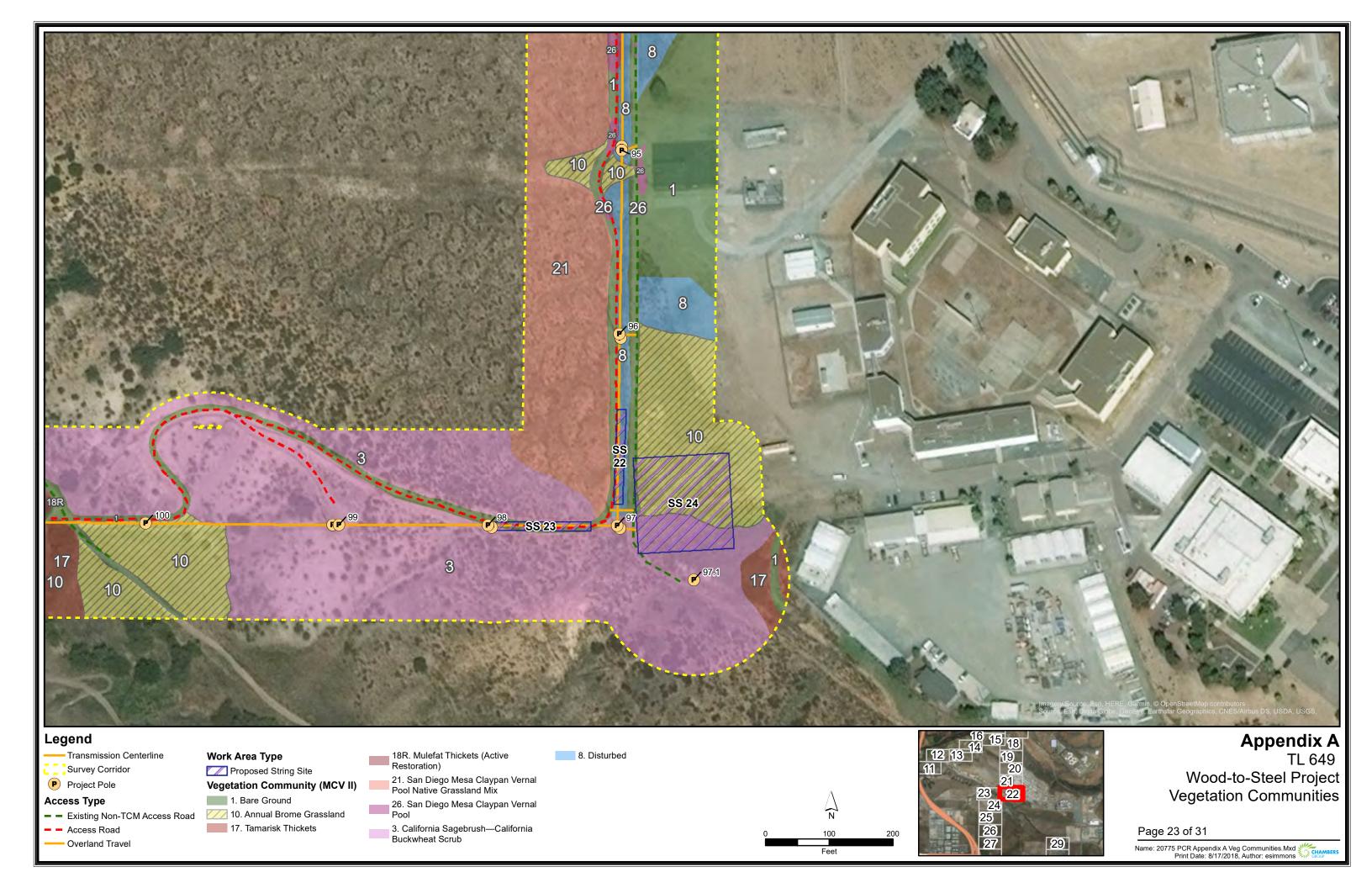


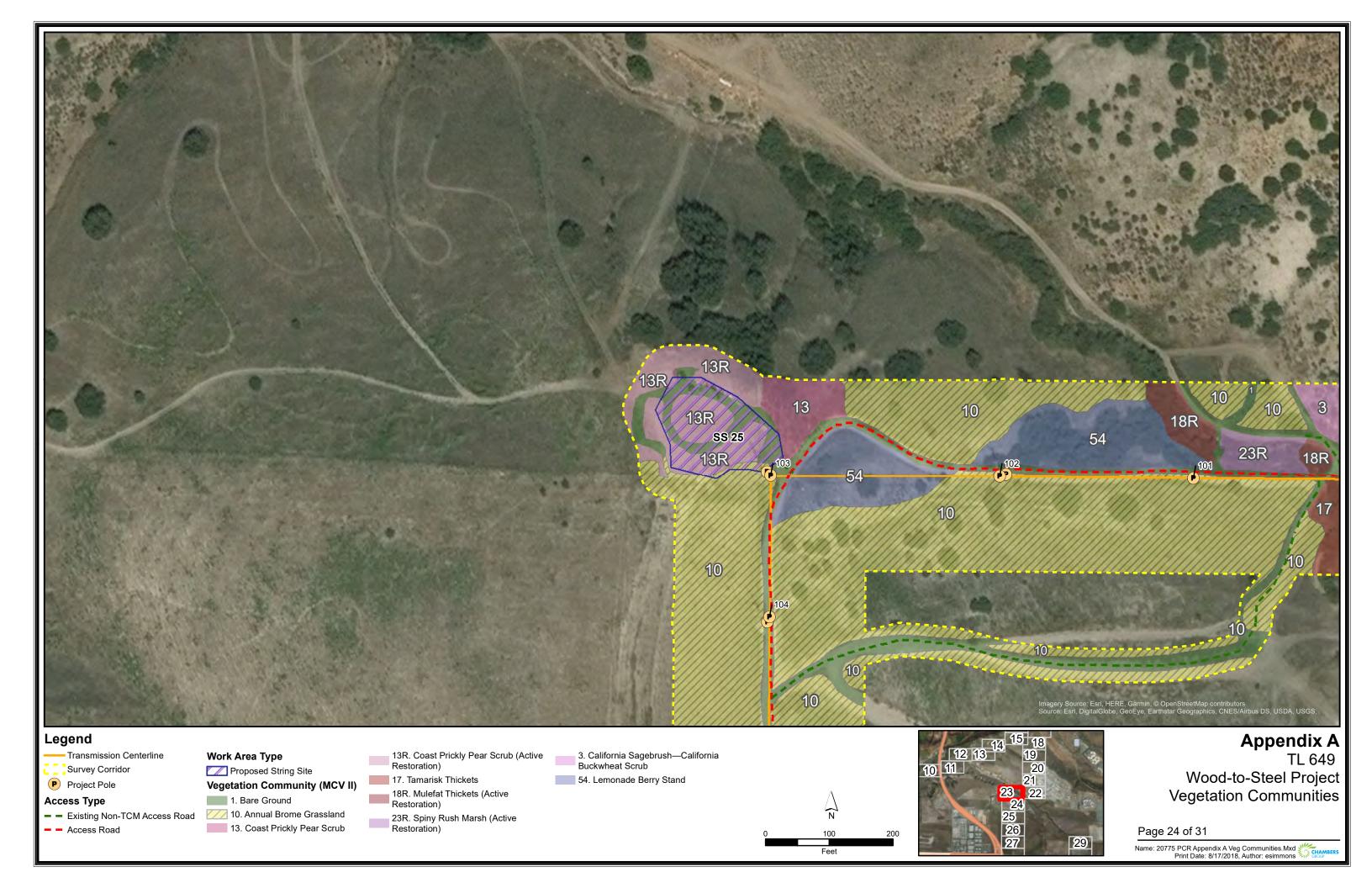


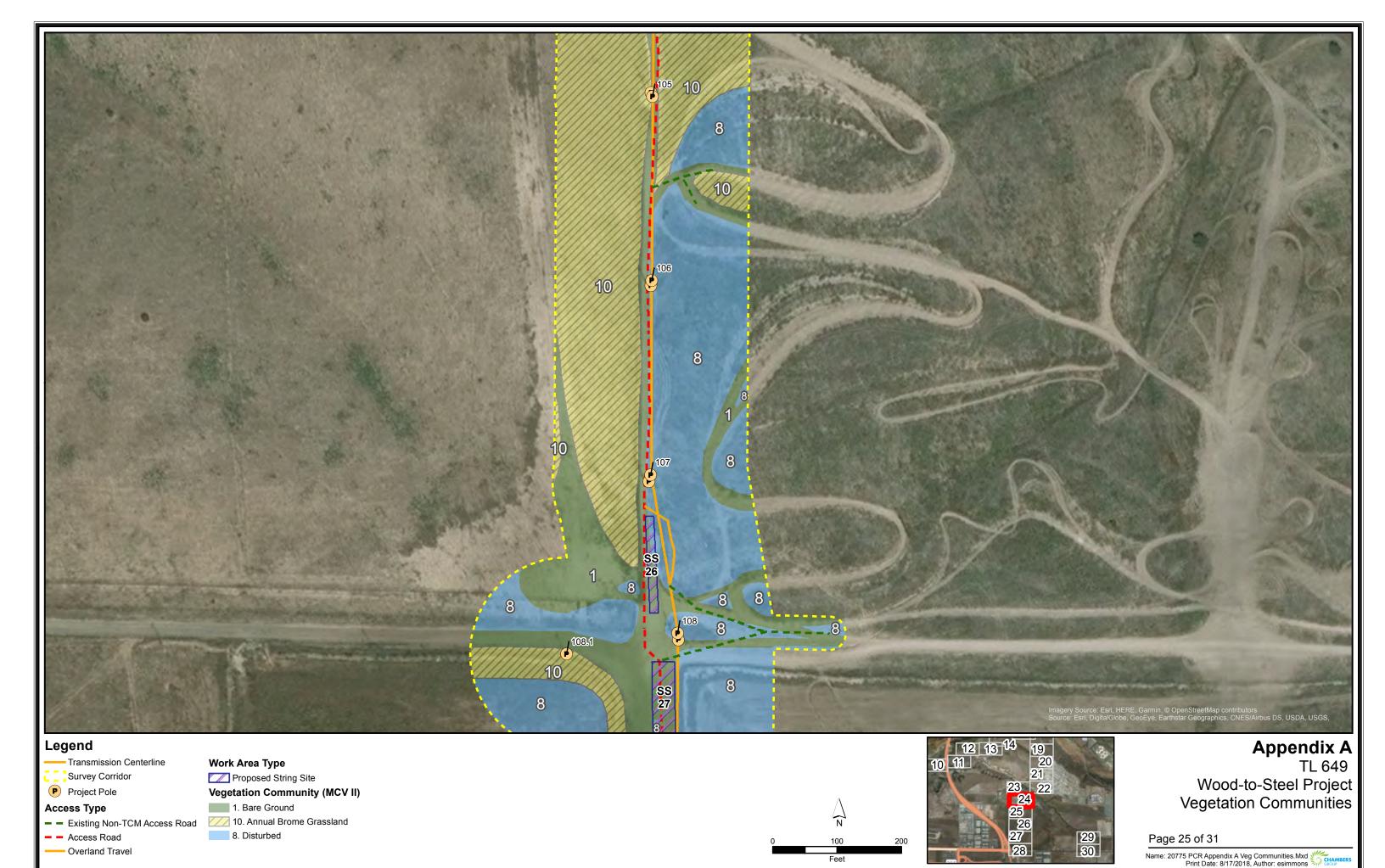


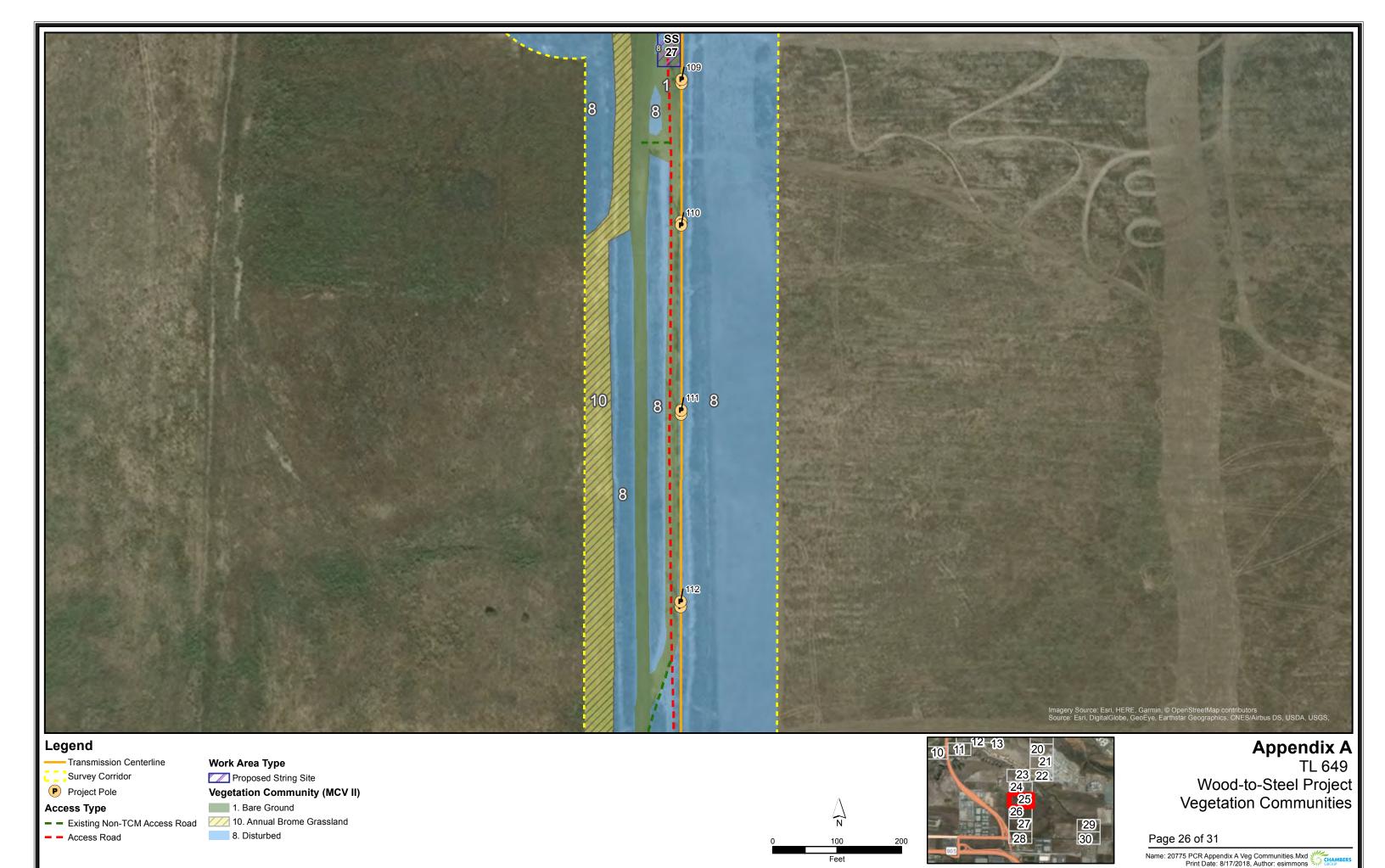


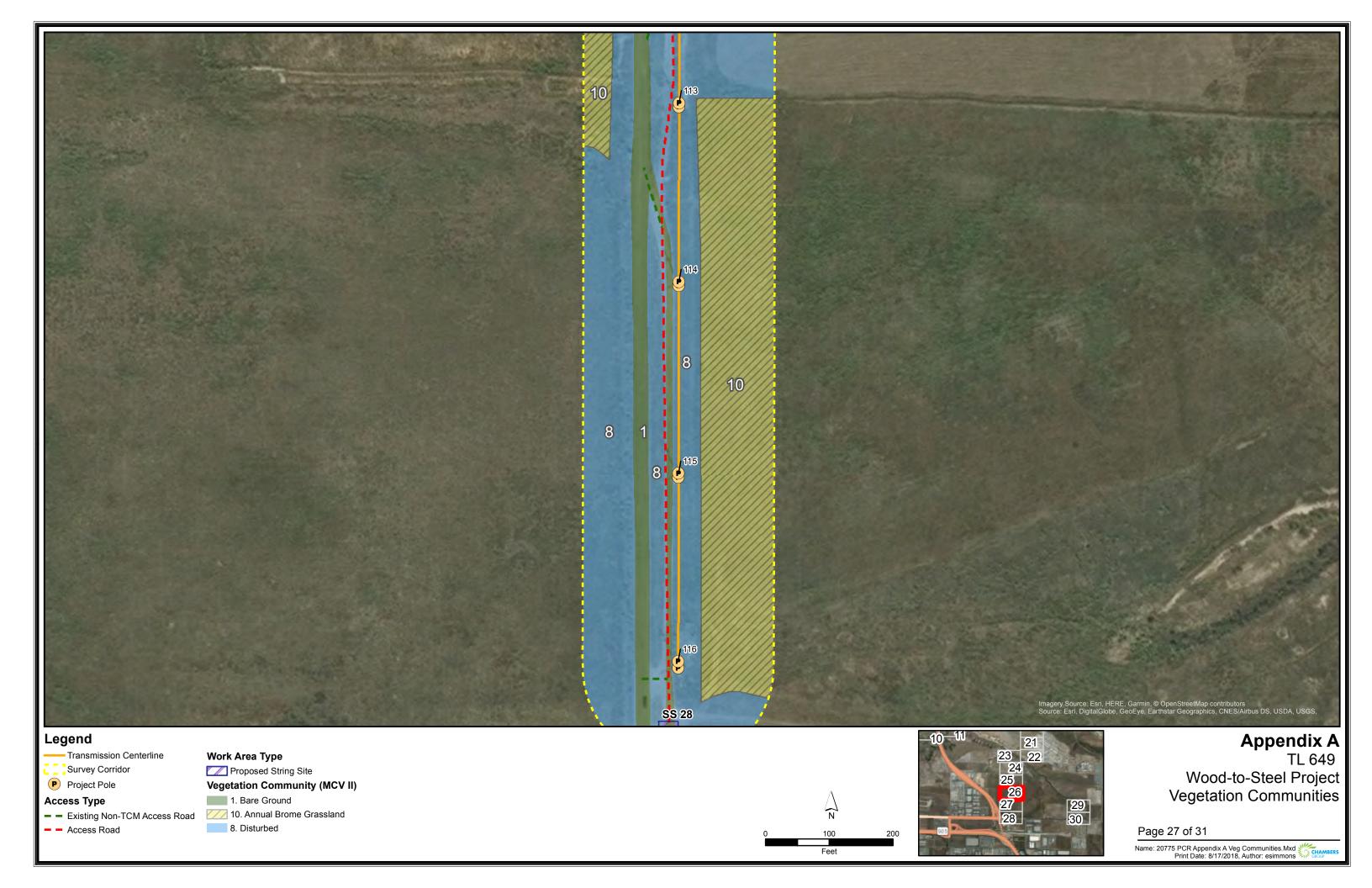


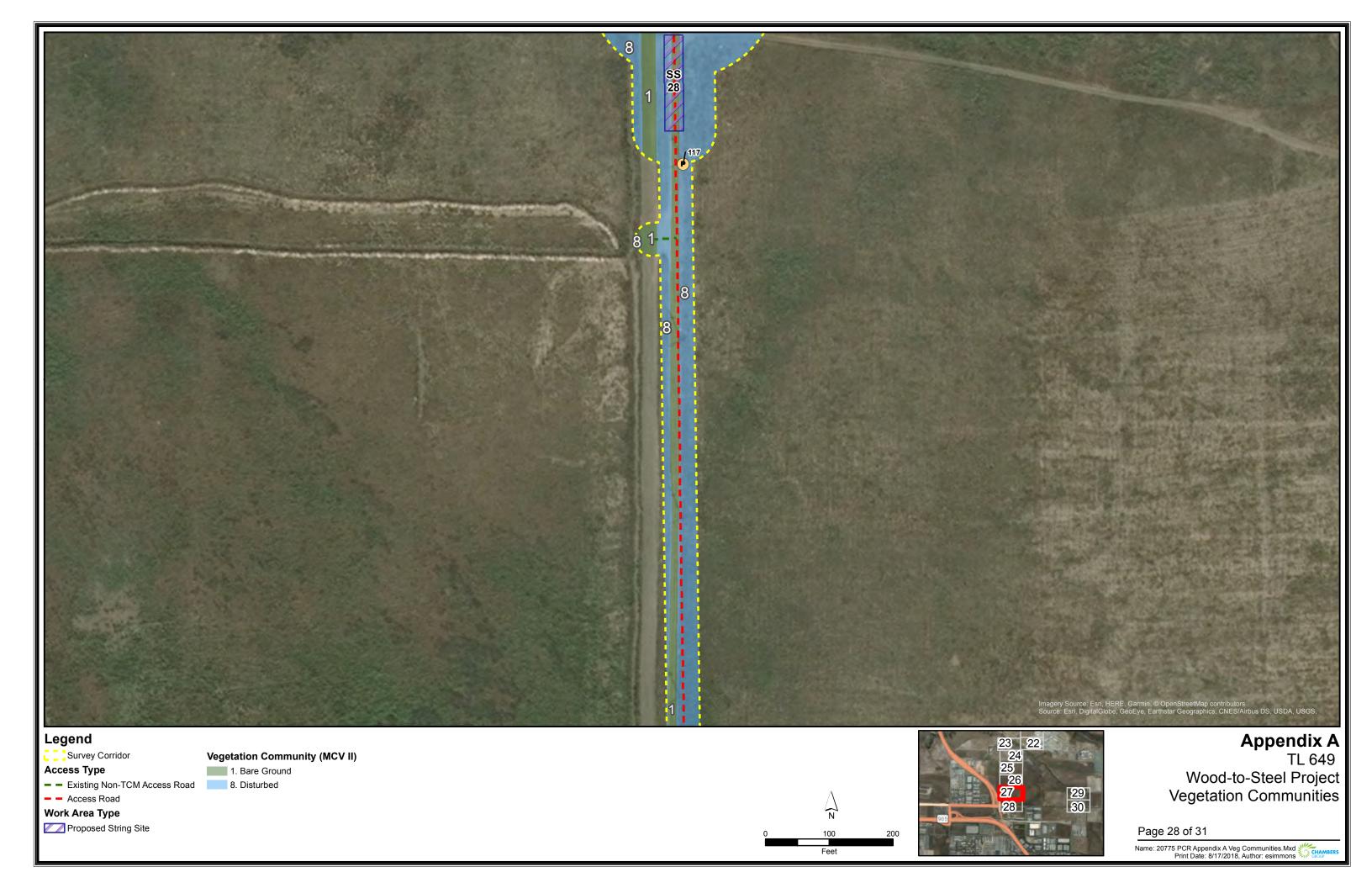


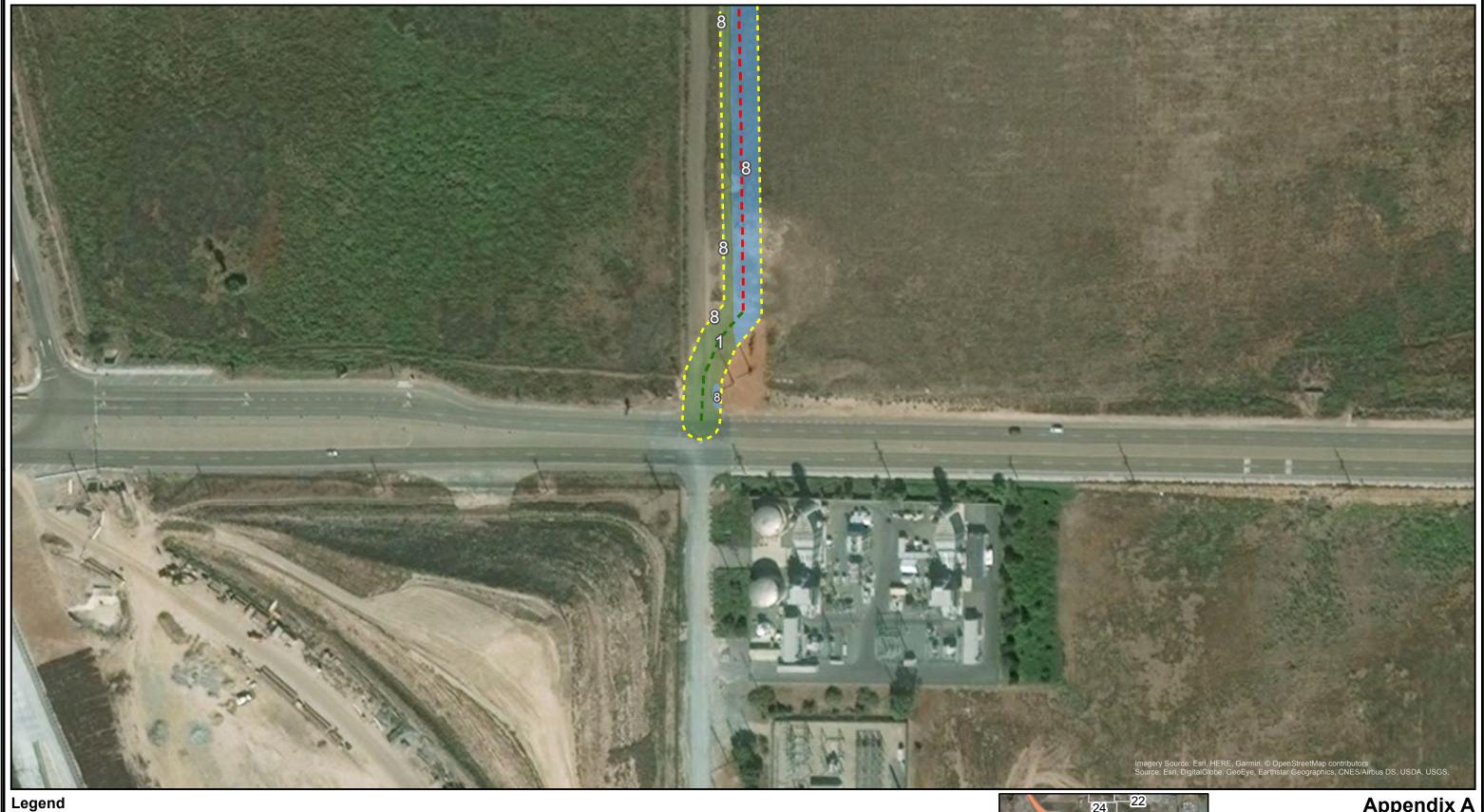












Survey Corridor

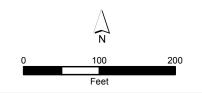
Access Type

- - Existing Non-TCM Access Road

- - Access Road

1. Bare Ground 8. Disturbed

Vegetation Community (MCV II)





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7. Urban and Developed

8. Disturbed

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APPENDIX B – PLANT SPECIES OBSERVED

Scientific Name	Common Name	2014	2018
LYCOPHYTES			
SELAGINELLACEAE	SPIKE-MOSS FAMILY	•	
Selaginella bigelovii	Bigelow's spike-moss	Х	Х
Selaginella cinerascens	mesa spike-moss	Х	Х
FERNS	•		
POLYPODIACEAE	POLYPODY FAMILY		
Polypodium californicum	California polypody	Х	
PTERIDACEAE	BRAKE FAMILY		
Pellaea mucronata var. mucronata	bird's foot cliff-brake	Х	
Pentagramma triangularis subsp. triangularis	California goldback fern	Х	Х
GYMNOSPERMS			
CUPRESSACEAE	CYPRESS FAMILY		
Cupressus sempervirens*	Italian cypress	Х	
Hesperocyparis forbesii	Tecate cypress	Х	Х
EPHEDRACEAE	EPHEDRA FAMILY		
Ephedra californica	desert tea	Х	Х
PINACEAE	PINE FAMILY		
Pinus halepensis+	Aleppo pine		Χ
MAGNOLIIDS			
SAURURACEAE	LIZARD'S-TAIL FAMILY		
Anemopsis californica	yerba mansa	Х	Х
ANGIOSPERMS (EUDICOTS)	•		
ADOXACEAE	MUSKROOT FAMILY		
Sambucus nigra subsp. caerulea	blue elderberry	Х	Х
AIZOACEAE	FIG-MARIGOLD FAMILY	_	
Aptenia cordifolia*	baby sun rose	Х	
Carpobrotus edulis*	hottentot-fig	Х	Х
Mesembryanthemum crystallinum*	crystalline iceplant	Х	Х
Mesembryanthemum nodiflorum*	slender-leaved iceplant	Х	Х
Sesuvium verrucosum	western sea-purslane	Х	Х
AMARANTHACEAE	AMARANTH FAMILY	•	-
Amaranthus albus*	tumbling pigweed	Х	Х
ANACARDIACEAE	SUMAC OR CASHEW FAMILY	•	-

Scientific Name	Common Name	2014	2018
Malosma laurina	laurel sumac	Χ	Х
Rhus integrifolia	lemonadeberry	Χ	Х
Rhus ovata	sugar bush	Х	Х
Schinus molle*	Peruvian pepper tree	Χ	Х
Schinus terebinthifolius+	Brazilian pepper tree	Χ	Х
Searsia lancea+	African sumac		Х
Toxicodendron diversilobum	poison oak	Х	Х
APIACEAE	CARROT FAMILY		
Apiastrum angustifolium	wild celery	Х	
Apium graveolens*	celery	Х	Х
Daucus pusillus	rattlesnake weed	Х	Х
Eryngium aristulatum var. parishii	San Diego button-celery	Х	Х
Foeniculum vulgare*	fennel	Х	Х
Lomatium dasycarpum	woolly-fruited lomatium	Х	
Lomatium lucidum	shiny lomatium	Х	
Sanicula arguta	sharp-toothed sanicle	Х	
Sanicula bipinnatifida	purple sanicle	Х	Х
Sanicula crassicaulis	Pacific sanicle	Х	Х
APOCYNACEAE	DOGBANE FAMILY		
Carissa macrocarpa+	natal plum	Χ	Х
Funastrum cynanchoides var. hartwegii	climbing milkweed	Х	Х
Nerium oleander+	oleander	Χ	Х
ASTERACEAE	SUNFLOWER FAMILY		
Achillea millefolium	California yarrow	Χ	Х
Ambrosia acanthicarpa	annual bur-sage	Χ	Х
Ambrosia chenopodiifolia	San Diego bur-sage	Х	Х
Ambrosia confertiflora	weak-leaved burweed	Х	Х
Ambrosia monogyra	leafy burrobush	Х	Х
Ambrosia psilostachya	western ragweed	Х	Х
Artemisia californica	California sagebrush	Х	Х
Artemisia douglasiana	mugwort	Х	Х
Artemisia dracunculus	tarragon	Х	
Artemisia palmeri	Palmer's sagewort	Х	Х
Baccharis pilularis	coyote brush	Х	Х
Baccharis salicifolia subsp. salicifolia	mule fat	Х	Х
Baccharis sarothroides	broom baccharis	Х	Х

Scientific Name	Common Name	2014	2018
Bahiopsis laciniata [Viguiera laciniata]	San Diego County viguiera	Х	Х
Bidens pilosa	common beggar-ticks	Х	
Brickellia californica	California brickellbush	Х	Х
Carduus pycnocephalus subsp. pycnocephalus*	Italian thistle	Х	Х
Centaurea melitensis*	tocalote	Χ	Х
Cirsium vulgare*	bull thistle	Х	Х
Corethrogyne filaginifolia	sand-aster	Х	Х
Cotula australis*	Australian brass-buttons	Х	
Cotula coronopifolia*	brass-buttons	Х	
Cynara cardunculus*	cardoon	Х	
Deinandra conjugens	Otay tarplant	Х	Х
Deinandra fasciculata	fascicled tarweed	Х	Х
Dittrichia graveolens*	stinkwort	Х	Х
Encelia californica	California bush sunflower	Х	Х
Ericameria brachylepis	boundary goldenbush	Х	Х
Erigeron bonariensis*	flax-leaved horseweed	Х	
Erigeron canadensis	horseweed	Х	
Eriophyllum confertiflorum var. confertiflorum	long-stem golden-yarrow	Х	Х
Gazania linearis*	treasure flower	Х	
Glebionis coronaria*	garland daisy	Х	Х
Grindelia camporum	gum-plant	Х	Х
Gutierrezia californica	california matchweed	Χ	Х
Hedypnois rhagadioloides*	crete hedypnois	Х	Х
Helminthotheca echioides*	bristly ox-tongue	Χ	Х
Hesperevax caulescens*	hogwallow starfish	Χ	
Heterotheca grandiflora	telegraph weed	Χ	Х
Holocarpha virgata subsp. elongata	graceful tarplant	Х	Х
Hypochaeris glabra*	smooth cat's-ear	Χ	Х
Hypochaeris radicata*	hairy cat's-ear	Χ	
Isocoma menziesii var. decumbens	decumbent goldenbush	Х	Х
Isocoma menziesii var. menziesii	spreading goldenbush	Х	Х
Isocoma menziesii var. vernonioides	Coastal goldenbush	Х	Х
Iva hayesiana	San Diego marsh-elder	Х	Х
Lactuca serriola*	prickly lettuce	Х	Х
Laennecia coulteri	Coulter's fleabane	Х	Х
Lasthenia gracilis	common goldfields	Х	Х

Scientific Name	Common Name	2014	2018
Logfia filaginoides	California fluffweed	Х	Х
Logfia gallica*	narrow-leaf filago	Х	Х
Matricaria discoidea*	common pineapple-weed	Х	Х
Oncosiphon piluliferum*	globe chamomile	Χ	Χ
Osmadenia tenella	southern rosinweed	Χ	Χ
Pluchea odorata var. odorata	salt marsh fleabane	Χ	
Pseudognaphalium biolettii	bicolored cudweed	Χ	Х
Pseudognaphalium californicum	California everlasting	Х	Х
Pseudognaphalium canescens	Wright's cudweed		Х
Pseudognaphalium luteoalbum*	everlasting cudweed	Χ	Х
Pseudognaphalium stramineum	cotton-batting plant	Х	
Psilocarphus brevissimus	woolly marbles	Х	
Senecio vulgaris*	common groundsel	Х	Х
Silybum marianum*	milk thistle	Х	Х
Sonchus asper subsp. asper*	prickly sow thistle	Х	Х
Sonchus oleraceus*	common sow thistle	Х	Х
Stylocline gnaphaloides	everlasting nest straw	Х	Х
Taraxacum officinale*	common dandelion	Х	
Uropappus lindleyi	silver puff	Х	Х
Xanthium strumarium	cocklebur	Х	
BIGNONIACEAE	BIGNONIA FAMILY		
Jacaranda mimosifolia+	jacaranda	Χ	
Spathodea campanulata+	fountian tree	Х	
Tecomaria capensis+	Cape honeysuckle	Χ	Х
BORAGINACEAE	BORAGE FAMILY		
Amsinckia menziesii	common fiddleneck	Χ	Х
Cryptantha clevelandii var. clevelandii	Cleveland's cryptantha	Χ	
Echium candicans*	pride of Madeira	Χ	
Eriodictyon trichocalyx var. trichocalyx	shiny-leaf yerba santa	Х	Х
Eucrypta chrysanthemifolia var. chrysanthemifolia	common eucrypta	Х	
Harpagonella palmeri	Palmer's grappling hook	Х	
Heliotropium curassavicum var. oculatum	salt heliotrope	Х	Х
Pectocarya linearis subsp. ferocula	slender pectocarya	Х	Х
Phacelia cicutaria var. hispida	caterpillar phacelia	Х	Х
Phacelia distans	wild heliotrope	Х	Х
Plagiobothrys acanthocarpus	adobe allocarya	Χ	Х

Scientific Name	Common Name	2014	2018
Plagiobothrys arizonicus	Arizona popcorn flower	Х	Х
Plagiobothrys collinus var. gracilis	San Diego popcornflower	Χ	Χ
BRASSICACEAE	MUSTARD FAMILY		
Brassica nigra*	black mustard	Х	Х
Brassica tournefortii*	Sahara mustard	Х	Х
Hirschfeldia incana*	shortpod mustard	Х	Х
Lepidium didymum	wart cress	Х	Х
Lepidium latifolium*	peppergrass	Х	Х
Lepidium nitidum	shining peppergrass	Х	Х
Lobularia maritima*	sweet-alyssum	Х	
Raphanus sativus*	radish	Х	Х
Sisymbrium altissimum*	tumble mustard	Х	
Sisymbrium irio*	London rocket	Х	Х
Sisymbrium orientale*	oriental hedge mustard	Х	
CACTACEAE	CACTUS FAMILY		
Bergerocactus emoryi	golden club cactus	Х	Х
Cylindropuntia prolifera	coast cholla	Х	Х
Ferocactus viridescens	coast barrel cactus	Х	Х
Mammillaria dioica	fish-hook cactus	Х	
Opuntia ficus-indica*	Mission prickly-pear		Х
Opuntia littoralis	coastal prickly pear	Х	Х
Opuntia oricola	pancake prickly pear	Х	Х
CAPRIFOLIACEAE	HONEYSUCKLE FAMILY		
Lonicera subspicata var. denudata	Johnston's honeysuckle	Х	Х
CARYOPHYLLACEAE	PINK FAMILY		
Cardionema ramosissimum	sand mat	Χ	Х
Silene gallica*	common catchfly	Х	Х
Spergularia bocconi*	Boccone's sandspurrey	Х	Х
Spergularia marina	saltmarsh sandspurrey	Х	
Stellaria media*	common chickweed		Х
Stellaria pallida*	lesser chickweed		Х
CHENOPODIACEAE	GOOSEFOOT FAMILY		
Atriplex canescens	four-wing saltbush	Х	Х
Atriplex lentiformis	big saltbush	Х	Х
Atriplex pacifica	south coast saltbush	Х	Х
Atriplex semibaccata*	Australian saltbush	Х	Х

Scientific Name	Common Name	2014	2018
Atriplex suberecta*	peregrine saltbush	Х	Х
Bassia hyssopifolia+	five horn bassia		Х
Beta vulgaris subsp. maritima*	sea beet	Х	Х
Chenopodium album*	lamb's quarters	Х	Х
Chenopodium californicum	California goosefoot	Х	Х
Salsola australis*	Russian thistle	Х	Х
Salsola tragus*	tumbleweed		Х
CLEOMACEAE	SPIDERFLOWER FAMILY		
Peritoma arborea var. arborea	bladderpod	Х	Х
CONVOLVULACEAE	MORNING-GLORY FAMILY		
Calystegia macrostegia subsp. tenuifolia	San Diego morning-glory	Х	Х
Convolvulus arvensis*	bindweed	Х	Х
Convolvulus simulans	small-flower bindweed	Х	Х
Cuscuta californica var. californica	chaparral dodder	Х	Х
CRASSULACEAE	STONECROP FAMILY		
Crassula argentea*	jade plant	Х	Х
Crassula connata	pygmy-weed	Х	Х
Dudleya edulis	ladies-fingers	Х	Х
Dudleya pulverulenta	chalk dudleya	Х	Х
Dudleya variegata^	variegated dudleya		
CUCURBITACEAE	GOURD FAMILY		
Cucurbita foetidissima	calabazilla	Х	Х
Marah macrocarpa	wild cucumber	Х	Х
ERICACEAE	HEATH FAMILY		
Arctostaphylos otayensis	Otay manzanita	Х	Х
EUPHORBIACEAE	SPURGE FAMILY		
Croton setiger	doveweed	Х	Х
Euphorbia albomarginata	white-margin sandmat	Х	Х
Euphorbia maculata*	spotted spurge	Х	Х
Euphorbia misera	cliff spurge	Х	Х
Euphorbia peplus*	petty spurge	Х	
Euphorbia polycarpa	small-seed sandmat	Х	Х
Euphorbia serpens*	creeping spurge	Х	
Ricinus communis*	castor-bean	Х	Х
FABACEAE	LEGUME FAMILY	•	
Acacia melanoxylon*	blackwood acacia		Х

Scientific Name	Common Name	2014	2018
Acacia redolens*	desert carpet	Х	
Acacia saligna*	golden wreath wattle	Х	Χ
Acmispon americanus var. americanus	Spanish clover	Х	Х
Acmispon glaber var. brevialatus	short-wing deerweed	Х	Χ
Acmispon glaber var. glaber	coastal deerweed	Х	Х
Acmispon maritimus var. maritimus	alkali lotus	Х	
Acmispon micranthus	San Diego lotus	Х	
Acmispon strigosus	strigose lotus	Х	
Astragalus trichopodus var. lonchus	ocean locoweed	Х	Х
Lupinus concinnus	bajada lupine	Х	
Medicago polymorpha*	bur clover	Х	Х
Melilotus albus*	white sweetclover	Х	Х
Melilotus indicus*	yellow sourclover	Х	Х
Prosopis glandulosa var. torreyana	honey mesquite	Х	Х
Prosopis velutina+	velvet mesquite	Х	
Trifolium hirtum*	rose clover	Х	Х
Vachellia farnesiana var. farnesiana+	sweet acacia	Х	Х
Vicia villosa subsp. villosa*	winter vetch	Х	Х
FAGACEAE	OAK FAMILY		
Quercus agrifolia var. agrifolia	coast live oak, encina	Х	Х
Quercus x acutidens	Torrey's scrub oak	Х	Х
GERANIACEAE	GERANIUM FAMILY		
Erodium botrys*	broad-lobed filaree	Х	Х
Erodium brachycarpum*	long-beaked filaree	Х	Х
Erodium cicutarium*	red-stemmed filaree	Х	Х
Erodium malacoides*	Mediterranean stork's-bill	Х	Х
Erodium moschatum*	white-stemmed filaree	Х	Х
Geranium carolinianum	Carolina geranium		Х
Pelargonium sp.+	garden geranium	Х	
GROSSULARIACEAE	GOOSEBERRY FAMILY	•	
Ribes speciosum	fuchsia-flowered gooseberry	Х	Х
LAMIACEAE	MINT FAMILY		
Marrubium vulgare*	horehound	Х	Х
Rosmarinus officinalis+	rosemary		Х
Salvia apiana	white sage	Х	Х
Salvia mellifera	black sage	Х	Х

Scientific Name	Common Name	2014	2018
Salvia munzii	Munz's sage	Х	Х
Stachys rigida var. quercetorum	hillside hedge-nettle	Х	Х
Trichostema lanceolatum	vinegar weed	Х	
LYTHRACEAE	LOOSESTRIFE FAMILY		
Lythrum hyssopifolia*	hyssop loosestrife		Х
MALVACEAE	MALLOW FAMILY		
Malacothamnus densiflorus	many-flowered mallow	Х	
Malva nicaeensis*	bull mallow	Х	
Malva parviflora*	cheeseweed	Х	Х
Malva pseudolavatera*	Cretan mallow		Х
Sidalcea sparsifolia	checker mallow	Х	Х
MONTIACEAE	MINER'S LETTUCE FAMILY		
Calandrinia ciliata	red maids	Χ	Χ
Claytonia parviflora subsp. parviflora	Utah miner's-lettuce	Χ	Х
MORACEAE	MULBERRY FAMILY		
Ficus sp.+	fig	Χ	
MYRSINACEAE	MYRSINE FAMILY		
Lysimachia arvensis*	scarlet pimpernel	Χ	Χ
MYRTACEAE	MYRTLE FAMILY		
Callistemon sp.+	bottlebrush tree	Х	
Eucalyptus sp.*	gum tree		Х
Eucalyptus camaldulensis*	red gum	Х	
Eucalyptus leucoxylon+	yellow gum		Х
Eucalyptus pulverulenta*	silver dollar eucalyptus	Х	
Eucalyptus viminalis+	ribbon gum		Х
Lophostemon confertus+	brush box	Х	
NYCTAGINACEAE	FOUR O'CLOCK FAMILY		
Bougainvillea sp.+	bougainvillea	Х	Х
Mirabilis laevis var. crassifolia	California wishbone bush	Х	Х
OLEACEAE	OLIVE FAMILY		
Fraxinus sp.+	ash	Х	
Fraxinus uhdei+	Shamel ash		Х
Olea europaea*	olive	Х	Х
ONAGRACEAE	EVENING PRIMROSE FAMILY	-	
Clarkia purpurea	purple clarkia		Х
Clarkia purpurea subsp. quadrivulnera	four-spot		Х

Scientific Name	Common Name	2014	2018
Epilobium canum subsp. canum	California fuchsia, zauschneria		Х
Epilobium ciliatum subsp. ciliatum	epilobium cilatum	Х	
Oenothera sinuosa*	wavy-leaf gaura	Х	Х
OROBANCHACEAE	BROOM-RAPE FAMILY		
Castilleja affinis subsp. affinis	coast paintbrush	Х	
Castilleja subinclusa subsp. subinclusa	long-leaf Indian paintbrush	Х	Χ
Dicranostegia orcuttiana	Orcutt's bird's-beak		Х
OXALIDACEAE	OXALIS FAMILY		
Oxalis californica	California wood-sorrel	Х	Х
Oxalis pes-caprae*	Bermuda buttercup	Х	Х
PAPAVERACEAE	POPPY FAMILY	•	
Eschscholzia californica	California poppy	Х	Х
Romneya trichocalyx	hairy matilija poppy	Х	Х
PHRYMACEAE	LOPSEED FAMILY	•	
Mimulus aurantiacus var. pubescens	southern sticky monkey-flower	Х	Х
Mimulus aurantiacus var. puniceus	red monkey-flower	Х	Х
Mimulus cardinalis	scarlet monkeyflower		Х
PHYTOLACCACEAE	POKEWEED FAMILY	•	
Phytolacca isosandra+	pokeweed	Х	Х
PITTOSPORACEAE	TOBIRA FAMILY	•	
Pittosporum sp.+	pittosporum	Х	
PLANTAGINACEAE	PLANTAIN FAMILY	•	
Kickxia elatine*	fluellin	Х	
Plantago elongata	prairie plantain	Х	
Plantago erecta	western plantain	Х	Х
Plantago rhodosperma	redseed plantain	Х	
Plantago virginica*	dwarf plantain	Х	
PLATANACEAE	SYCAMORE FAMILY	•	
Platanus x acerifolia+	London plane tree		Х
Platanus racemosa	western sycamore	Х	Х
PLUMBAGINACEAE	LEADWORT FAMILY	•	
Limonium sp.+	marsh rosemary, statice	Х	Х
Plumbago auriculata+	cape plumbago	Х	Х
POLEMONACEAE	PHLOX FAMILY	•	-
Linanthus dianthiflorus	fringed linanthus		Х
Navarretia hamata subsp. leptantha	hooked navarettia		Х

Scientific Name	Common Name	2014	2018
POLYGONACEAE	BUCKWHEAT FAMILY		
Eriogonum elongatum var. elongatum	long-stemmed buckwheat	Х	Х
Eriogonum fasciculatum var. fasciculatum	coastal California buckwheat	Х	Х
Eriogonum fasciculatum var. polifolium	Mojave desert California buckwheat	Х	Х
Polygonum aviculare subsp. aviculare*	common knotweed	Х	Х
Pterostegia drymarioides	California thread-stem	Х	
Rumex conglomeratus*	dock	Х	
Rumex crispus*	curly dock	Х	Х
PORTULACACEAE	PURSLANE FAMILY	•	
Portulaca oleracea*	common purslane	Х	
PRIMULACEAE	PRIMROSE FAMILY	•	
Primula clevelandii	Padre's shooting star		Х
PUNICACEAE	POMEGRANATE FAMILY		
Punica granatum+	pomegranate	Х	Х
RANUNCULACEAE	BUTTERCUP FAMILY		
Clematis pauciflora	southern California clematis		Х
Myosurus minimus subsp. apus	little mousetail		Х
Ranunculus californicus var. californicus	California buttercup	Х	Х
RHAMNACEAE	BUCKTHORN FAMILY		
Adolphia californica	spine shrub	х	Х
Ceanothus otayensis	Otay-lilac	х	Х
Ceanothus tomentosus	woolly-leaved ceanothus	Х	Χ
Rhamnus crocea	spiny redberry	Х	Х
ROSACEAE	ROSE FAMILY		
Adenostoma fasciculatum	chamise	Х	Х
Drymocallis glandulosa var. wrangelliana	sticky cinquefoil		Х
Heteromeles arbutifolia	toyon	Х	Х
Prunus ilicifolia	holly-leaf cherry	Х	Х
Prunus sp.+	cherry	Х	Х
Pyracantha sp.+	firethorn	Х	
Pyrus sp.+	pear	Х	
Rhaphiolepis indica+	Indian hawthorn		Х
Rosa minutifolia	small-leaf rose	х	Х
Rosa sp.+	ornamental rose	Х	
RUBIACEAE	MADDER FAMILY		
Galium angustifolium subsp. angustifolium	narrow-leaf bedstraw	Х	Х

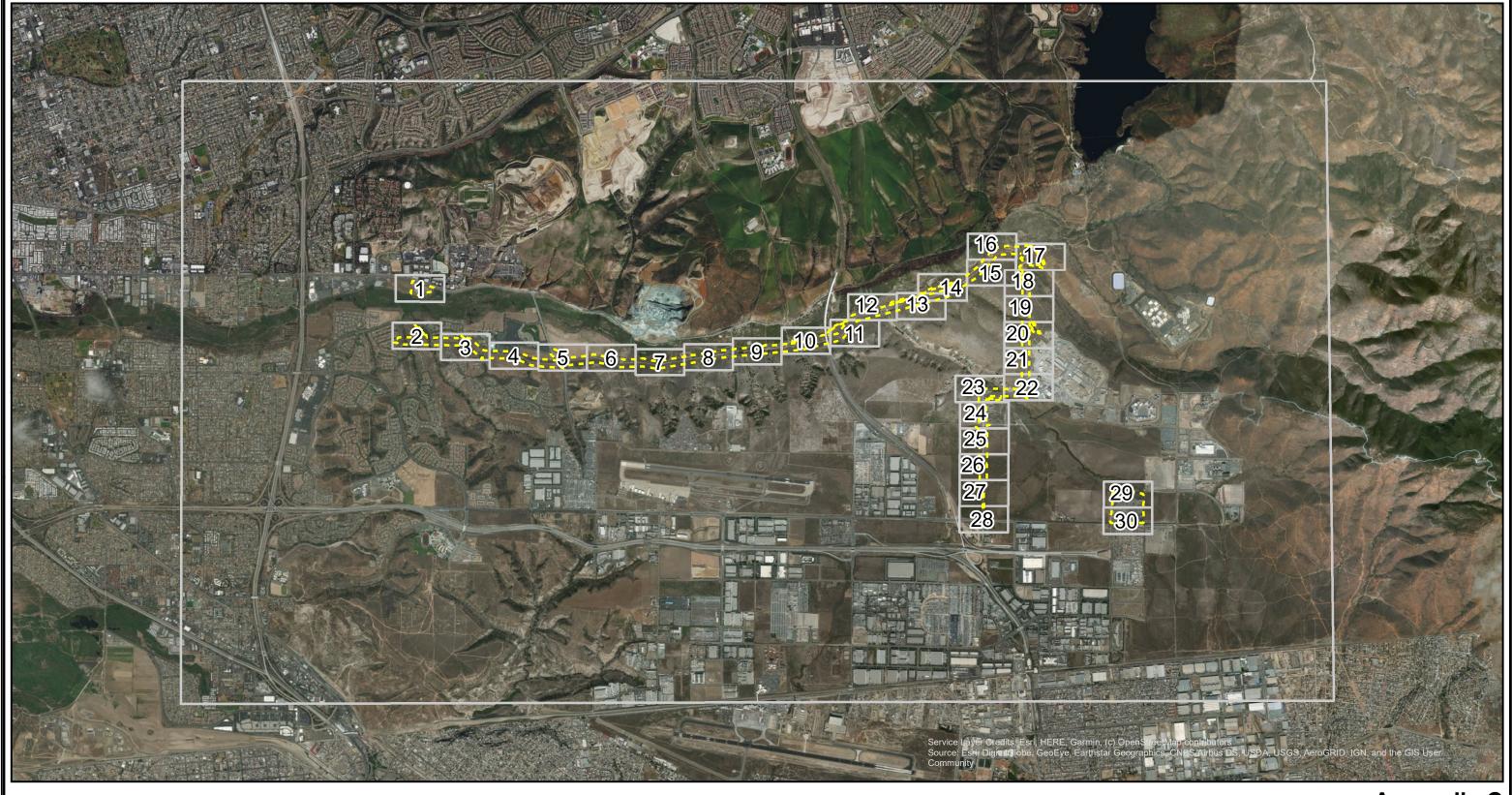
Scientific Name	Common Name	2014	2018
Galium aparine	goose grass	Х	Х
Galium nuttallii	San Diego bedstraw		Χ
Galium nuttallii subsp. nuttallii	climbing bedstraw		Χ
Galium parisiense*	wall bedstraw	Х	Χ
SALICACEAE	WILLOW FAMILY		
Populus fremontii subsp. fremontii	Fremont cottonwood	Х	Х
Salix exigua	narrow-leaved willow	Х	Х
Salix gooddingii	black willow	Х	Х
Salix laevigata	red willow	Х	Х
Salix lasiolepis	arroyo willow	Х	Х
SAPINDACEAE	SOAPBERRY FAMILY		
Acer saccharinum+	silver maple		Х
Dodonaea viscosa var. purpurea+	hop bush	Х	
Koelreuteria bipinnata+	goldenrain tree		Х
SCROPHULARIACEAE	FIGWORT FAMILY		
Myoporum bateae+	Bate's myoporum	Х	
Myoporum laetum+	myoporum, Ngaio tree	Х	
Myoporum parvifolium+	slender myoporum		Х
SIMAROUBACEAE	QUASSIA FAMILY		
Ailanthus altissima*	tree of heaven		Х
SIMMONDSIACEAE	JOJOBA FAMILY		
Simmondsia chinensis	jojoba, goatnut	Х	Х
SOLANACEAE	NIGHTSHADE FAMILY		
Datura wrightii	jimson weed	Х	Х
Lycium andersonii	Anderson's wolfberry	Х	Х
Lycium californicum	California box-thorn		Х
Nicotiana glauca*	tree tobacco	Х	Х
Solanum douglasii	Douglas' nightshade	Х	Х
Solanum nigrum*	black nightshade	Х	
TAMARICACEAE	TAMARISK FAMILY	•	•
Tamarix ramosissima*	Mediterranean tamarisk	Х	Х
URTICACEAE	NETTLE FAMILY	•	-
Hesperocnide tenella	western nettle	Х	
Parietaria hespera var. hespera	western pellitory	Х	Х
Urtica dioica subsp. holosericea	stinging nettle	Х	Х
Urtica urens*	dwarf nettle	Х	Х

Scientific Name	Common Name	2014	2018
VERBENACEAE	VERVAIN FAMILY		
Lantana camara+	common lantana	Х	
Lantana montevidensis+	trailing lantana	Х	Х
Verbena lasiostachys	western vervain		Х
Verbena menthifolia	mint-leaved verbena	Х	Х
VIOLACEAE	VIOLET FAMILY		
Viola pedunculata	Johnny-jump-up	Х	Х
ZYGOPHYLLACEAE	CALTROP FAMILY		
Fagonia laevis	California fagonia	Х	
ANGIOSPERMS (MONOCOTS)			
AGAVACEAE	AGAVE FAMILY		
Agave americana+	century plant	Х	Х
Agave attenuata+	agave	Х	
Chlorogalum parviflorum	small-flowered amole	Х	
Hesperoyucca whipplei	our Lord's candle	Х	Х
Phormium sp.+	New Zealand flax	Х	
Yucca elephantipes+	spineless yucca		Х
Yucca schidigera	Mojave yucca	Х	Х
ALLIACEAE	ONION FAMILY		
Allium praecox	early onion	Х	Х
Allium sp.+	onion		Х
ARECACEAE	PALM FAMILY		
Chamaerops humilis+	European fan palm	Х	
Phoenix canariensis*	Canary Island date palm	Х	Х
Syagrus romanzoffiana+	queen palm	Х	
Washingtonia robusta+	Mexican fan palm	Х	Х
ASPHODELACEAE	ASPHODEL FAMILY		
Aloe sp.+	aloe	Х	
Asphodelus fistulosus*	hollow-stem asphodel	Х	
CYPERACEAE	SEDGE FAMILY		
Eleocharis macrostachya	common spike rush		
Eleocharis montevidensis	slender creeping spike-rush	Х	Х
Schoenoplectus americanus	winged three-square	Х	Х
Schoenoplectus californicus	California bulrush	Х	Х
IRIDACEAE	IRIS FAMILY		
Iris sp.+	iris	Х	

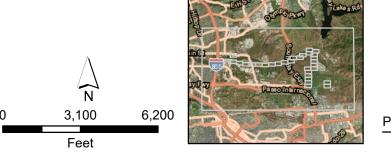
Scientific Name	Common Name	2014	2018	
Sisyrinchium bellum	blue-eyed grass	Х	Х	
JUNCACEAE	RUSH FAMILY	RUSH FAMILY		
Juncus acutus subsp. leopoldii	southwestern spiny rush	Х	Х	
Juncus bufonius var. bufonius	toad rush	Х	Х	
Juncus dubius	mariposa rush		Х	
LILIACEAE	LILY FAMILY	_	_	
Calochortus splendens	lilac mariposa lily	Х	Х	
MELANTHIACEAE	FALSE-HELLEBORE FAMILY			
Toxicoscordion fremontii	Fremont star lily		Х	
POACEAE	GRASS FAMILY			
Agrostis viridis*	water bentgrass	Х		
Aristida adscensionis	six-week's three-awn	Х		
Arundo donax*	giant reed	Х	Х	
Avena barbata*	slender wild oat	Х	Х	
Avena fatua*	wild oat	Х	Х	
Avena sativa+	cultivated oat		Х	
Bothriochloa barbinodis	cane bluestem	Х		
Bouteloua dactyloides	buffalo grass	Х		
Bouteloua gracilis	common grama	Х		
Brachypodium distachyon*	false-brome	Х	Х	
Bromus catharticus*	rescue grass	Х	Х	
Bromus diandrus*	ripgut grass	Х	Х	
Bromus grandis	tall brome	Х		
Bromus hordeaceus*	soft chess	Х	Х	
Bromus madritensis subsp. rubens*	red brome	Х	Х	
Cortaderia selloana*	pampas grass	Х	Х	
Crypsis schoenoides*	prickle grass	Х		
Cynodon dactylon*	Bermuda grass	Х	Х	
Dactylis glomerata*	orchard grass	Х		
Digitaria sanguinalis*	hairy crabgrass	Х		
Distichlis spicata	saltgrass		Х	
Elymus canadensis*	Canada wild rye		Х	
Elymus condensatus	giant wild rye		Х	
Elymus triticoides	beardless wild rye	Х	Х	
Festuca myuros*	rat-tail fescue	Х	Х	
Festuca perennis*	Italian ryegrass	Х	Х	

Scientific Name	Common Name	2014	2018
Gastridium phleoides*	nit grass	Х	Х
Hordeum marinum subsp. gussoneanum*	Mediterranean barley	Х	Х
Hordeum murinum subsp. leporinum*	hare barley	Х	Х
Lamarckia aurea*	goldentop	Х	Х
Melica imperfecta	coast range melic	Х	Х
Muhlenbergia rigens	deergrass	Х	Х
Muhlenbergia microsperma	littleseed muhly		Х
Pennisetum setaceum*	fountain grass	Х	Х
Phalaris minor*	Mediterranean canary grass	Х	Х
Poa secunda subsp. secunda	one-sided bluegrass	Х	Х
Polypogon monspeliensis*	annual beard grass	Х	Х
Schismus barbatus*	Mediterranean schismus	Х	Х
Setaria verticillata*	hooked bristlegrass	Х	
Sporobolus cryptandrus	sand dropseed	Х	
Stipa cernua	nodding needlegrass	Х	
Stipa coronata	crested needlegrass		Х
Stipa lepida	small-flowered needlegrass	Х	Х
Stipa miliacea var. miliacea*	smilo grass	Х	Х
Stipa pulchra	purple needlegrass	Х	Х
Triticum aestivum+	common wheat		Х
THEMIDACEAE	BRODIAEA FAMILY	_	
Bloomeria clevelandii	San Diego goldenstar	Х	Х
Bloomeria crocea var. crocea	common goldenstar	Х	Х
Brodiaea terrestris subsp. kernensis	dwarf brodiaea	Х	Х
Dichelostemma capitatum	blue dicks	Х	Х
ТҮРНАСЕАЕ	CATTAIL FAMILY		
Typha domingensis	slender cattail	Х	

^{* =} Non-Native Species; + = Non-Native and Ornamental, Unlikely to be Invasive; **Emboldened** = Special-Status Species; ^ = Observed in 2015 Only







Appendix C TL 649 Wood-to-Steel Project Focused Plant Survey Results 2014 & 2018

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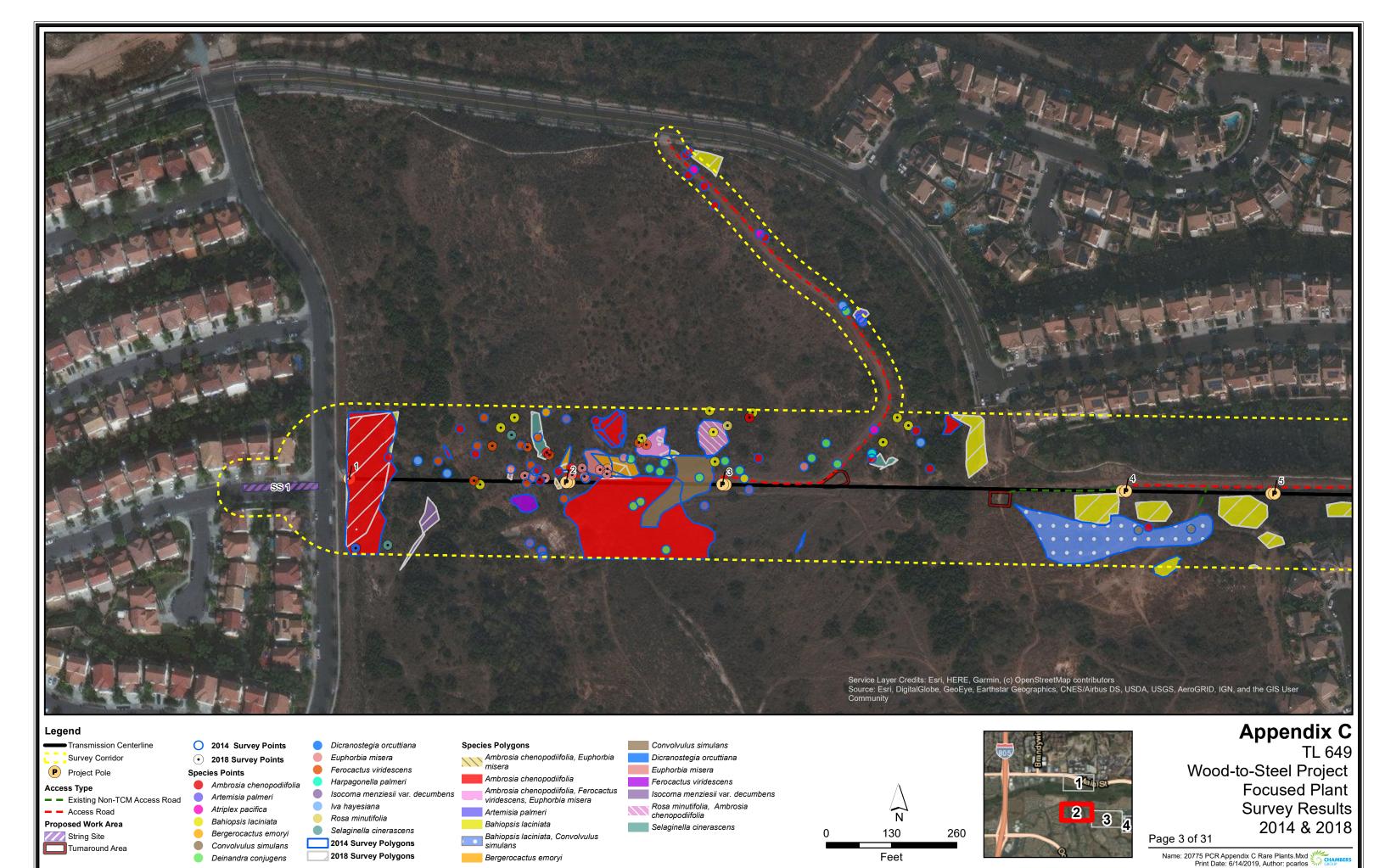
Legend Survey Corridor Proposed Work Area Staging Yard

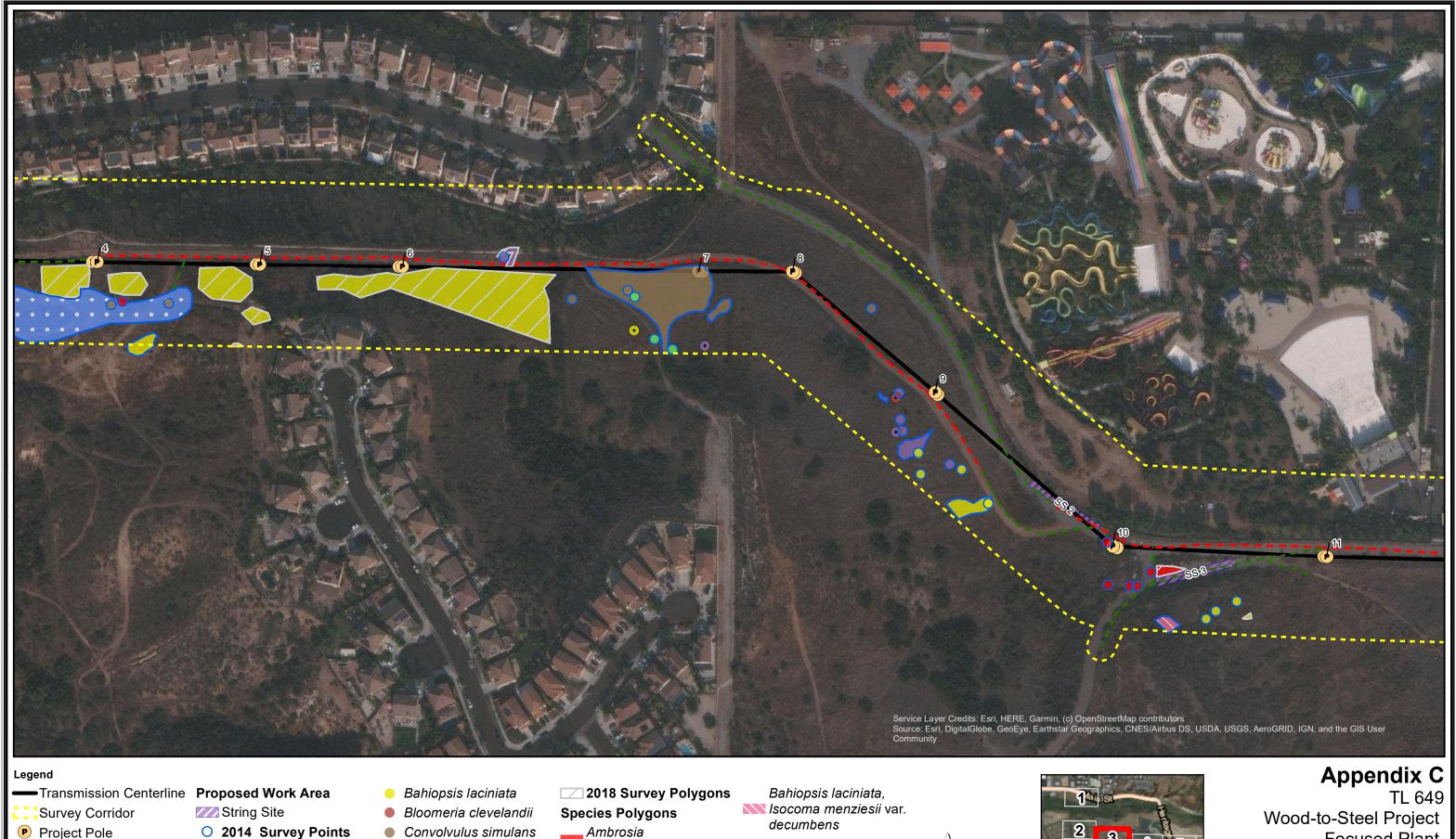


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Name: 20775 PCR Appendix C Rare Plants.Mxd Print Date: 6/13/2019, Author: pcarlos





Access Type

- **Existing Non-TCM** Access Road
- - Access Road
- O 2014 Survey Points
- **⊙** 2018 Survey Points

Species Points

Ambrosia chenopodiifolia

- Convolvulus simulans
- Deinandra conjugens
- Isocoma menziesii var. decumbens
- 2014 Survey Polygons
- Ambrosia
- chenopodiifolia
- Bahiopsis laciniata Bahiopsis laciniata, Convolvulus simulans
- Convolvulus simulans
- Isocoma menziesii var. decumbens

130

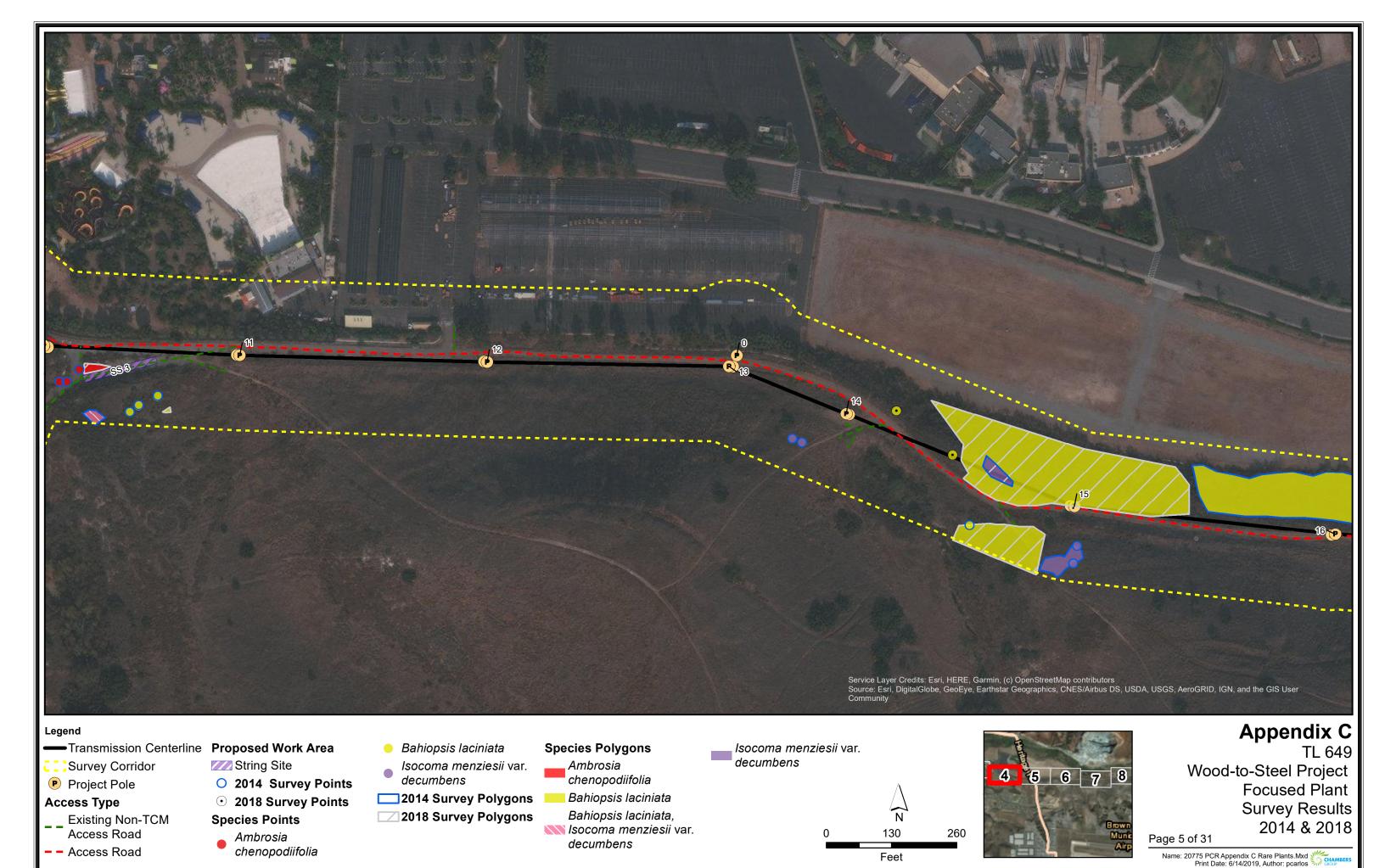
Feet

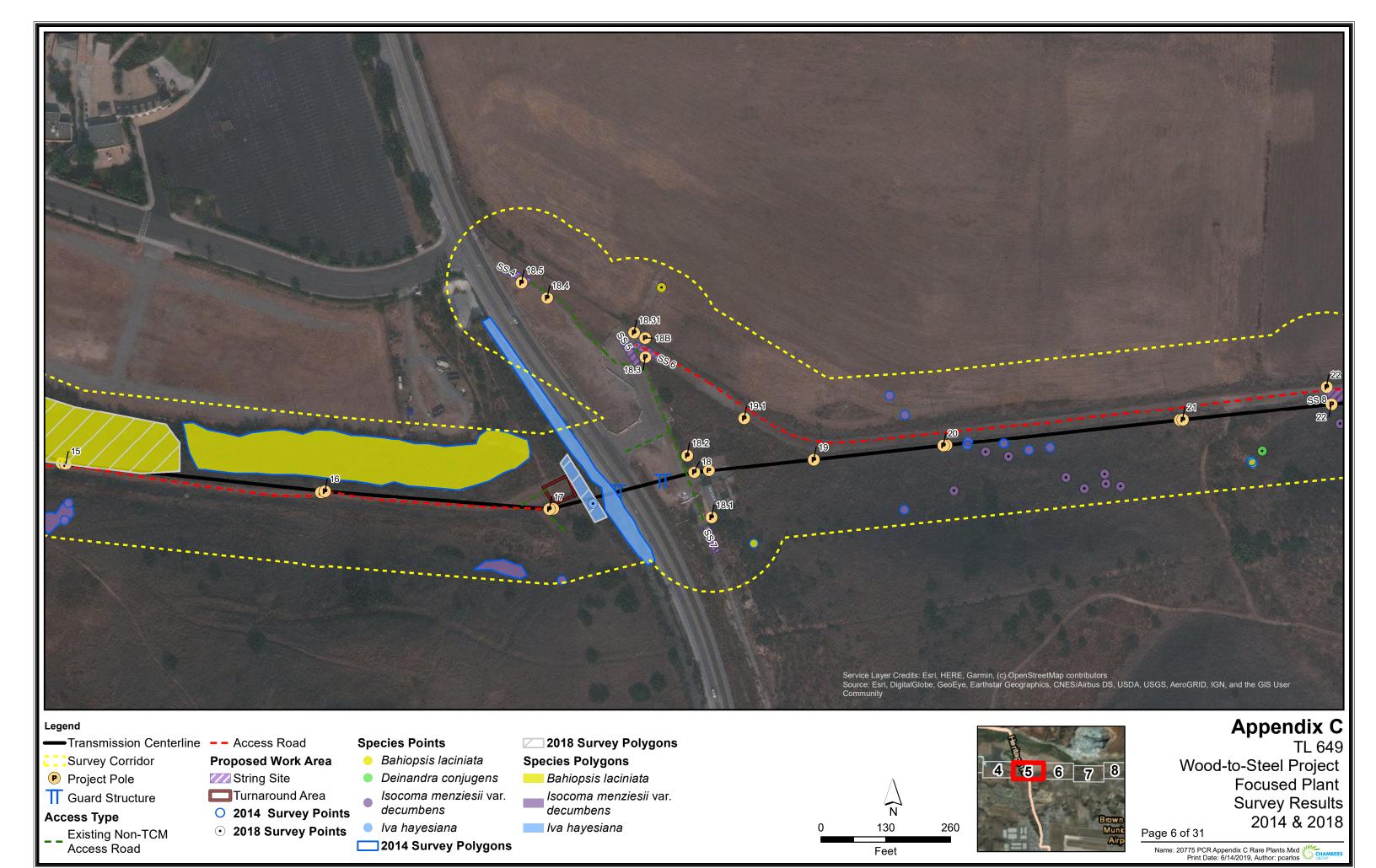
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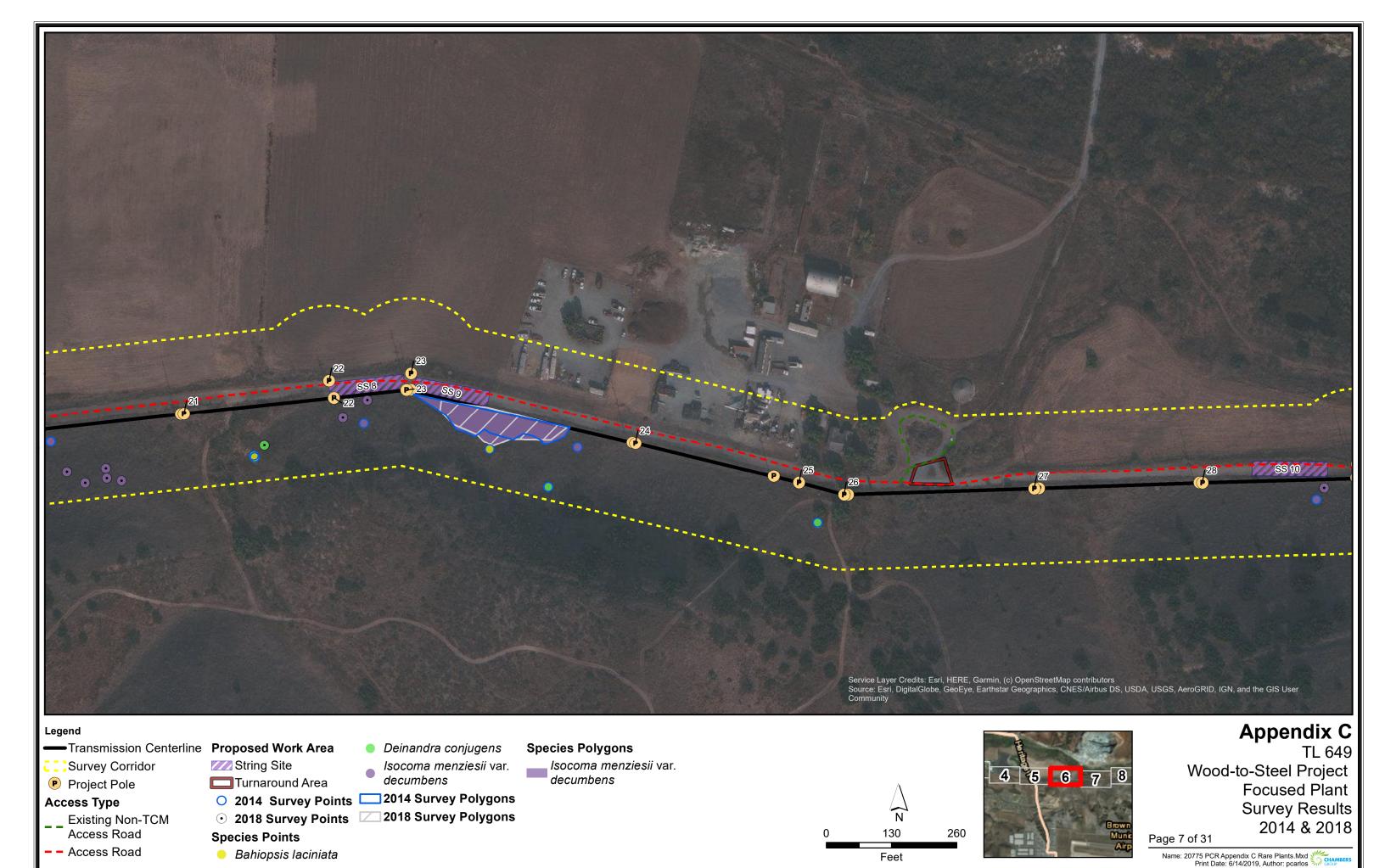
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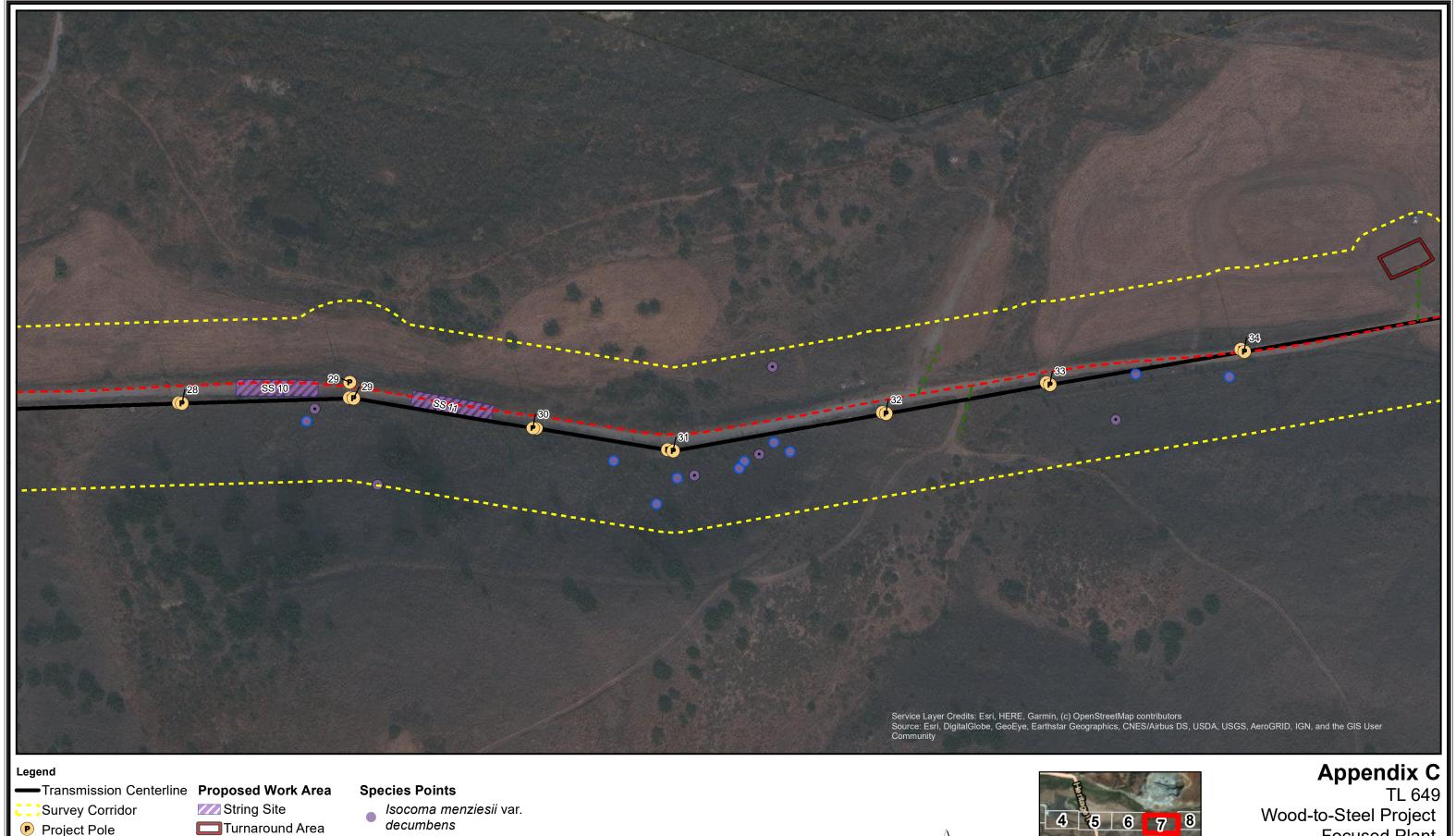
Focused Plant Survey Results 2014 & 2018

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Project Pole

Access Type

Existing Non-TCM Access Road

Access Road

O 2014 Survey Points

Isocoma menziesii var. decumbens

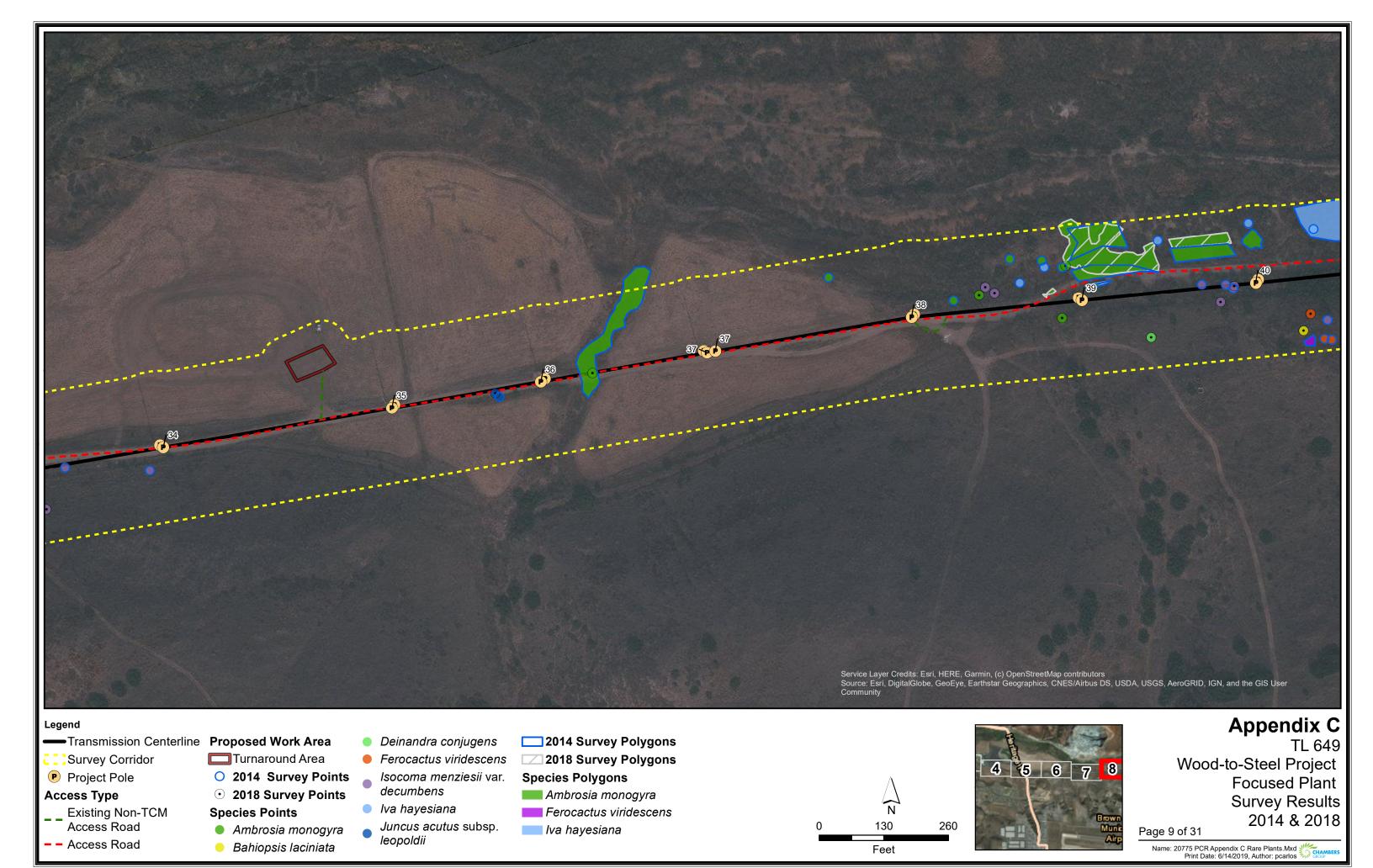
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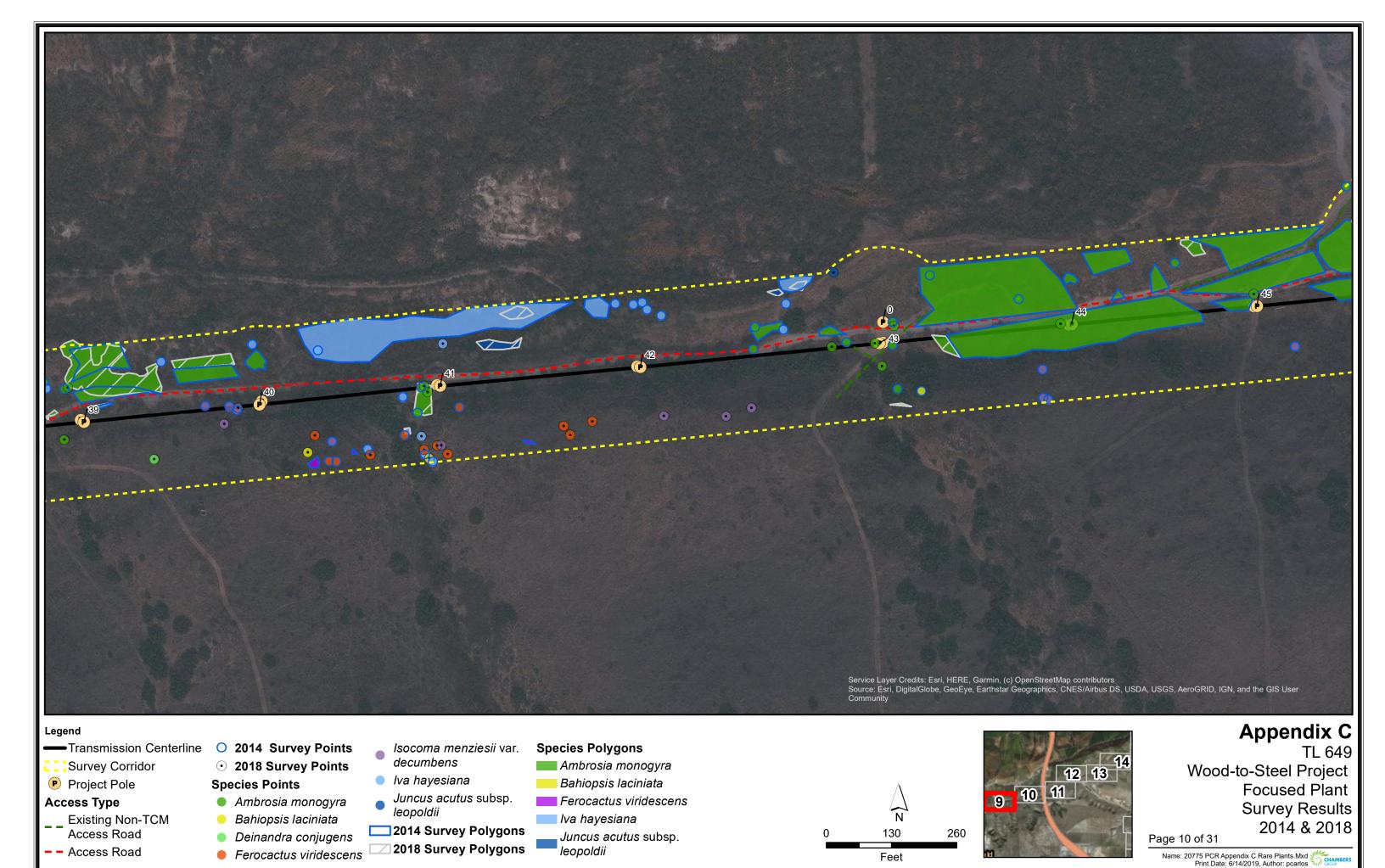
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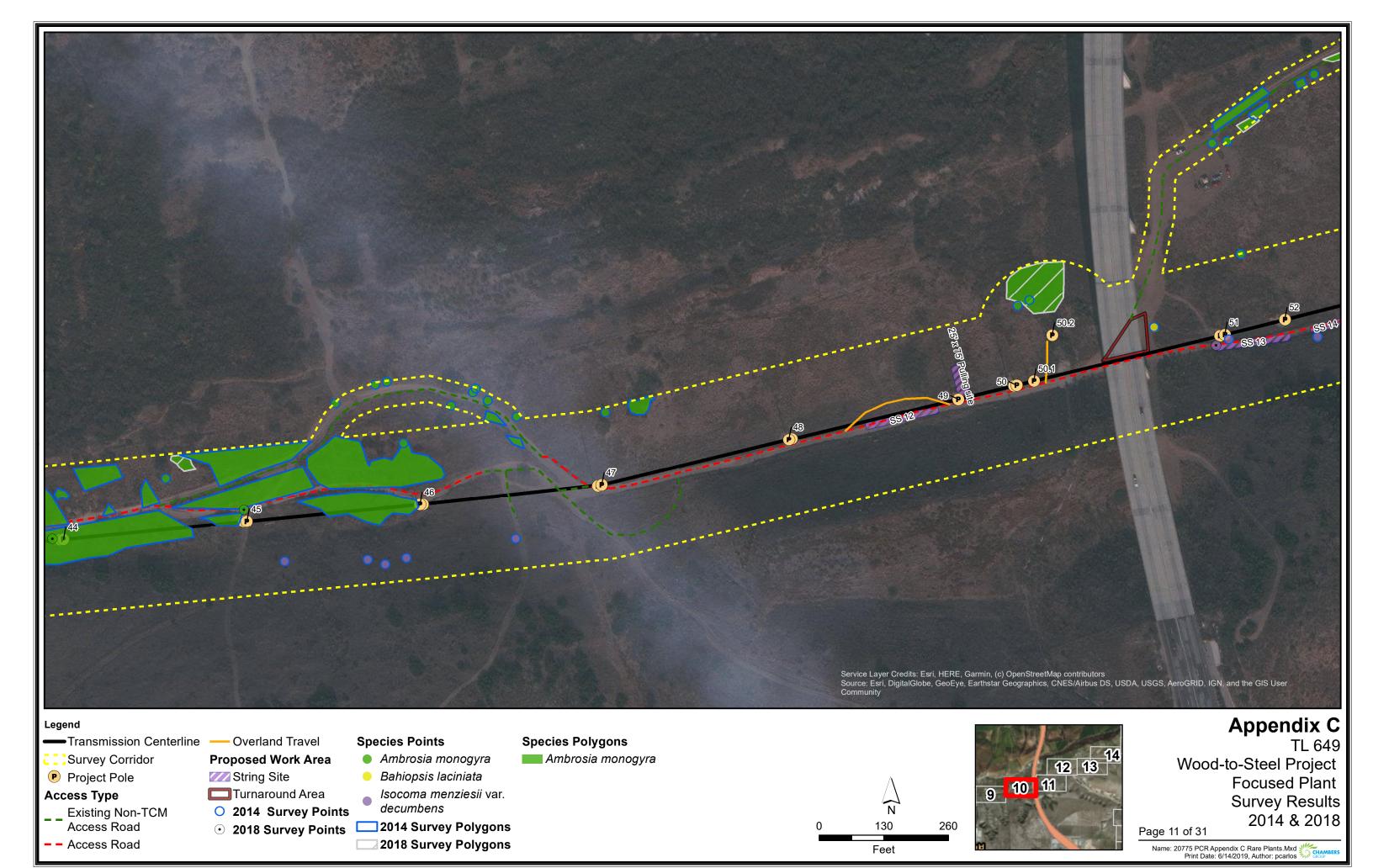
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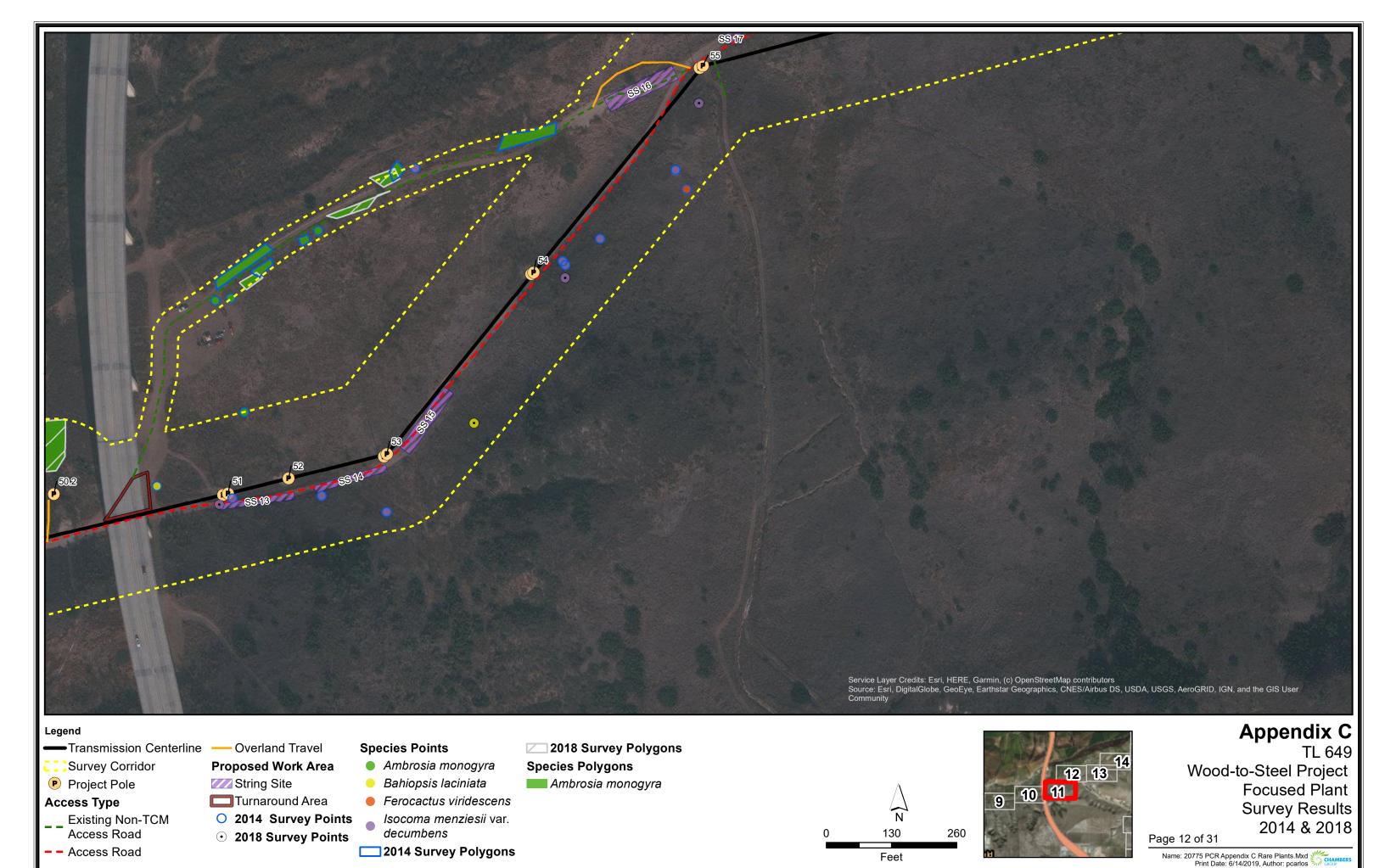
Wood-to-Steel Project Focused Plant Survey Results 2014 & 2018

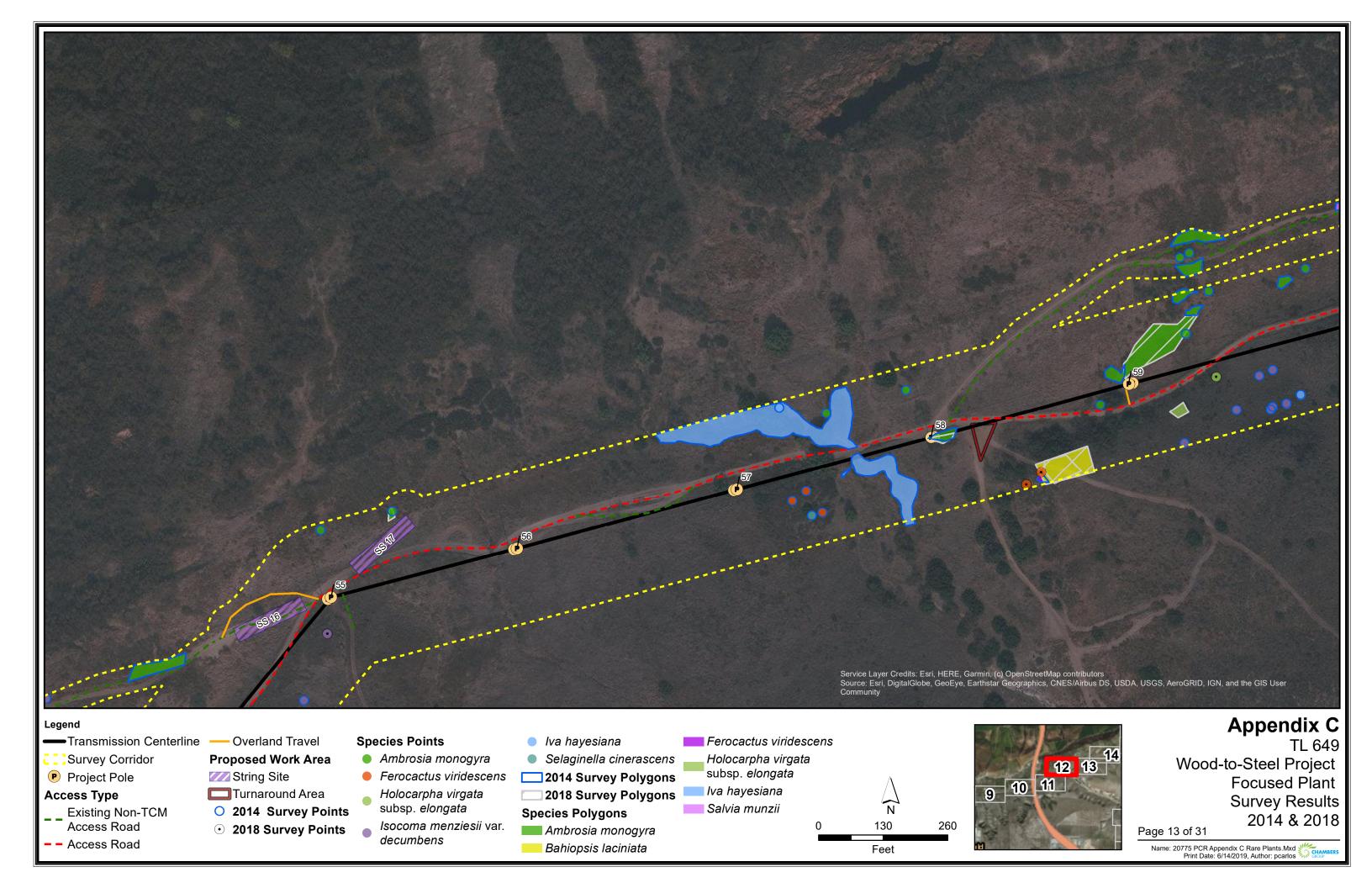
Page 8 of 31

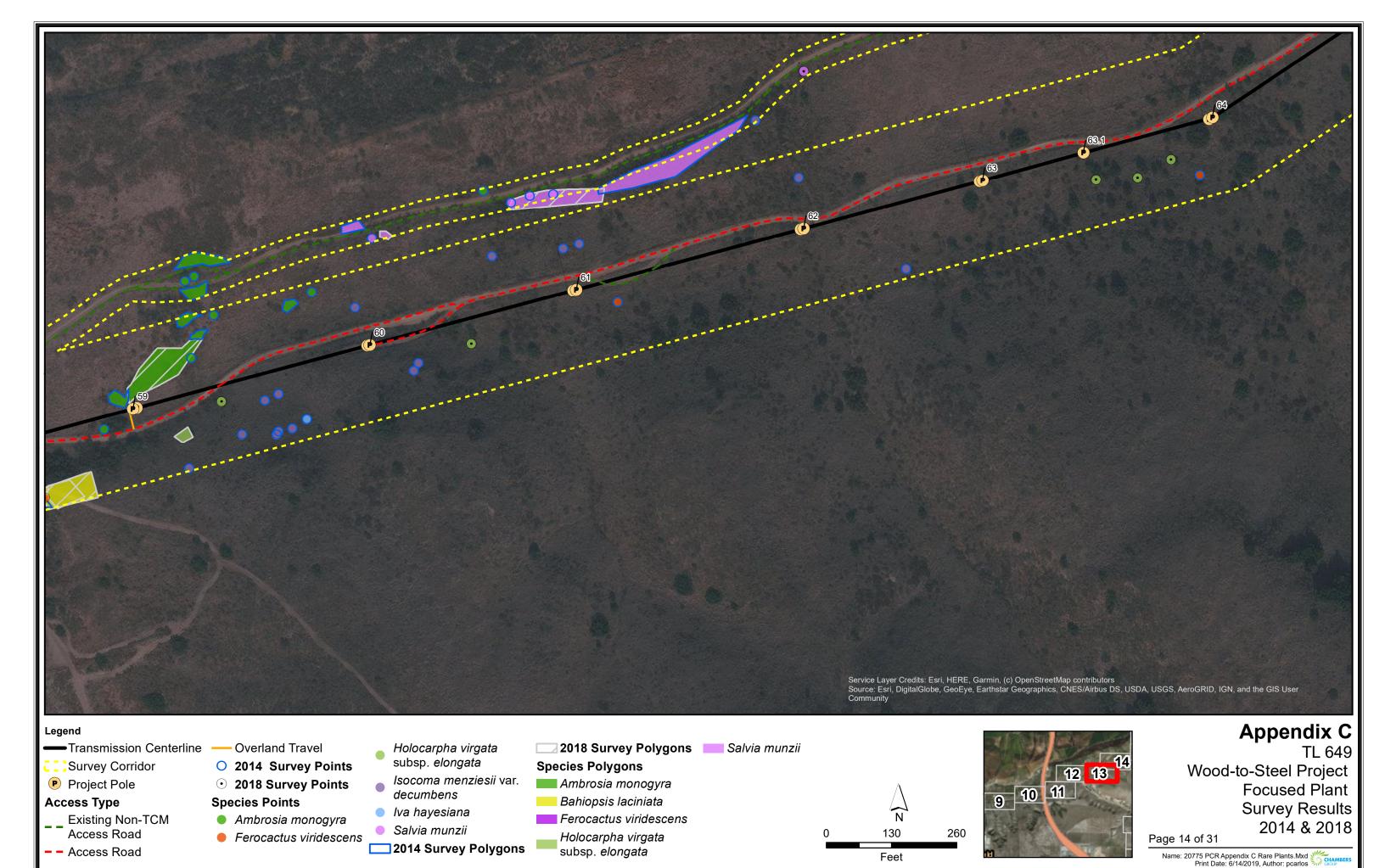


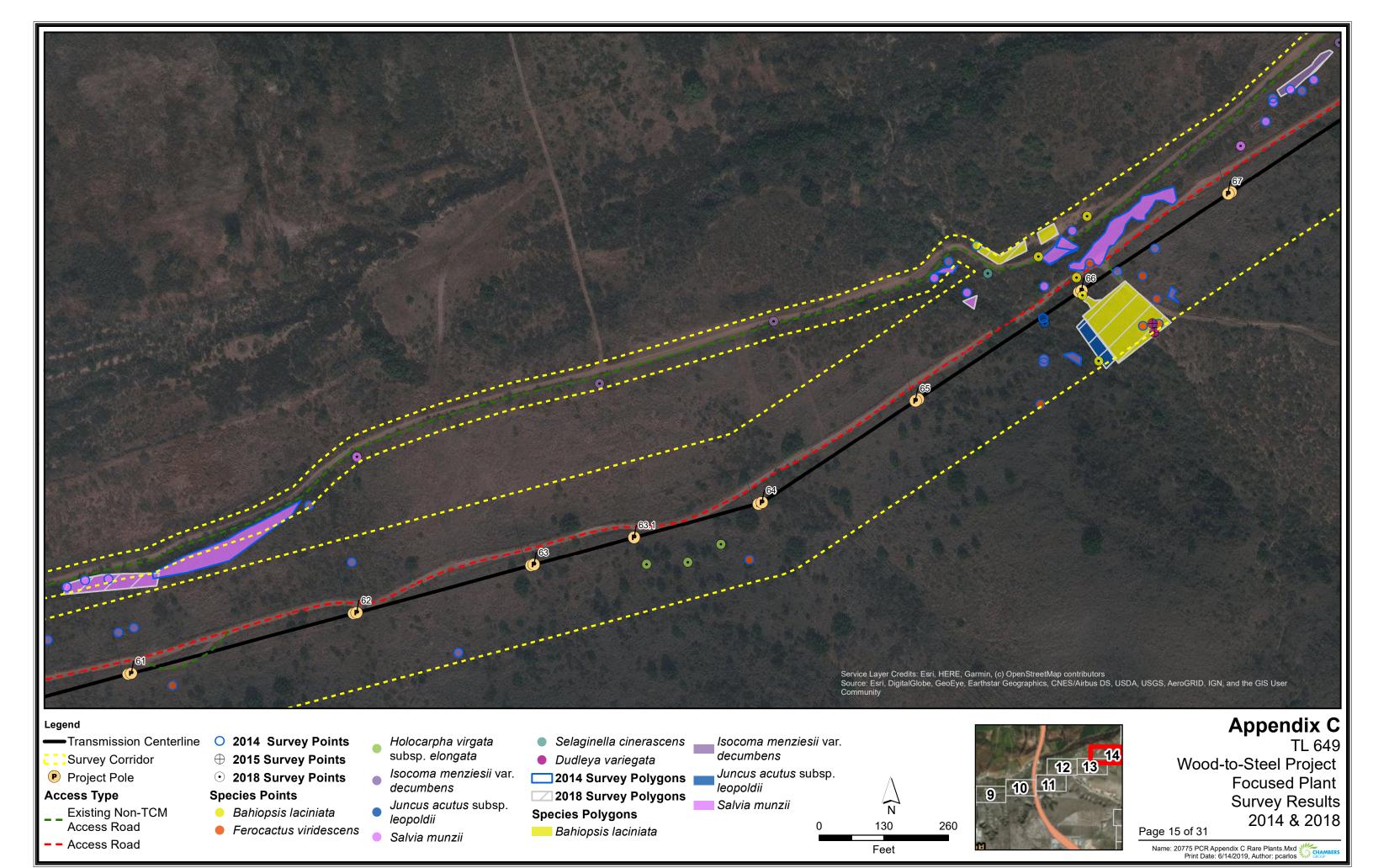


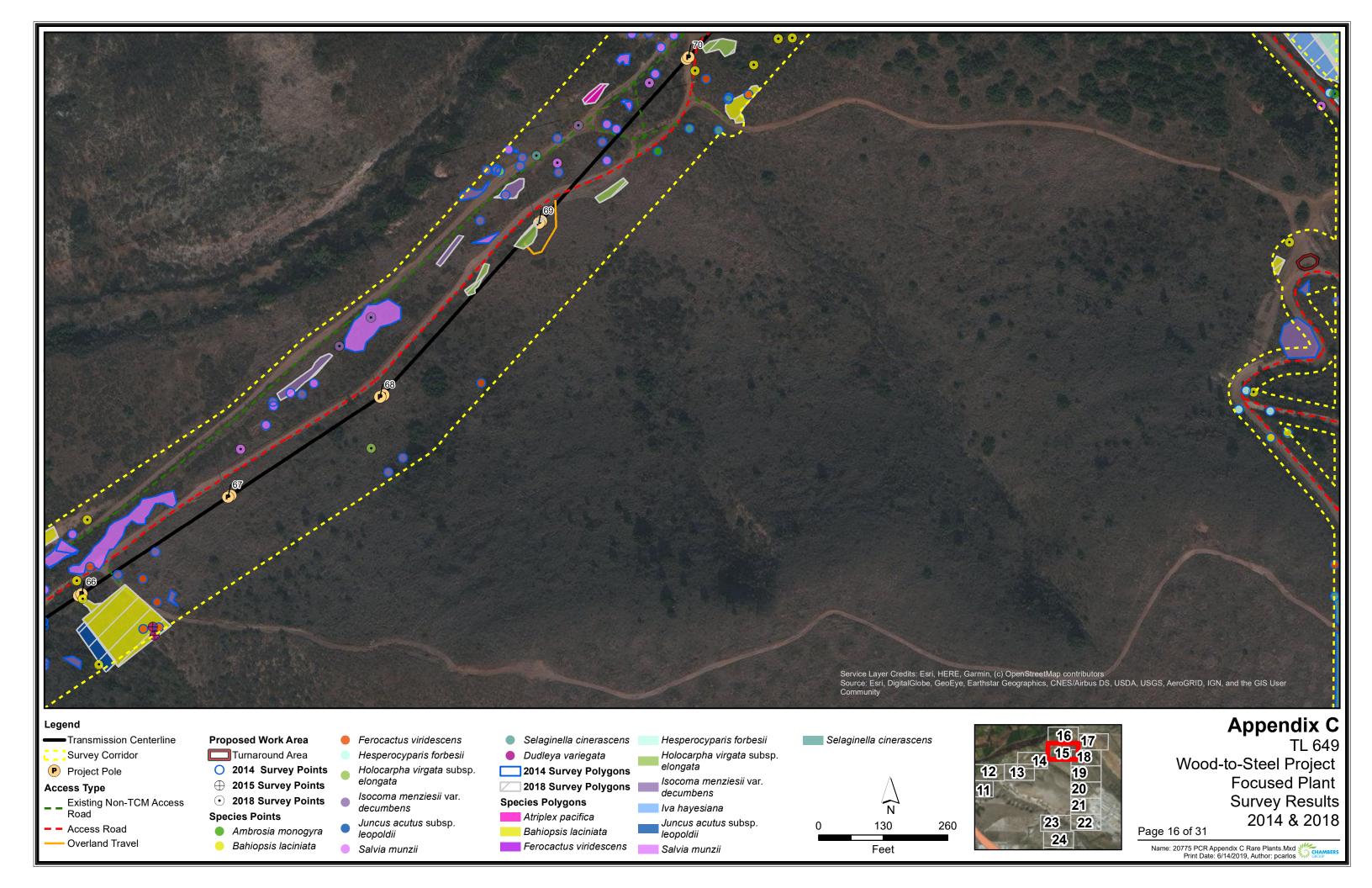


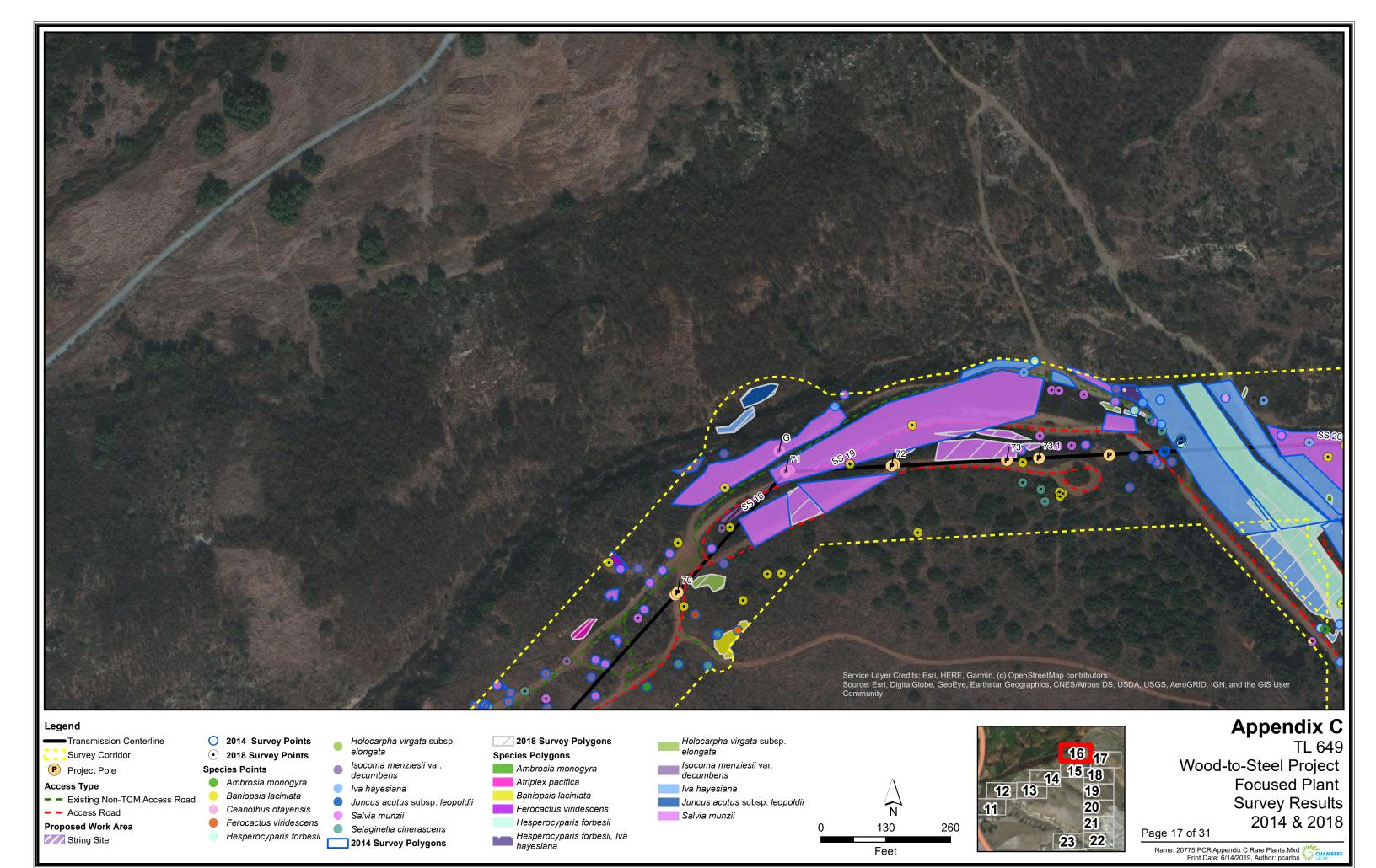


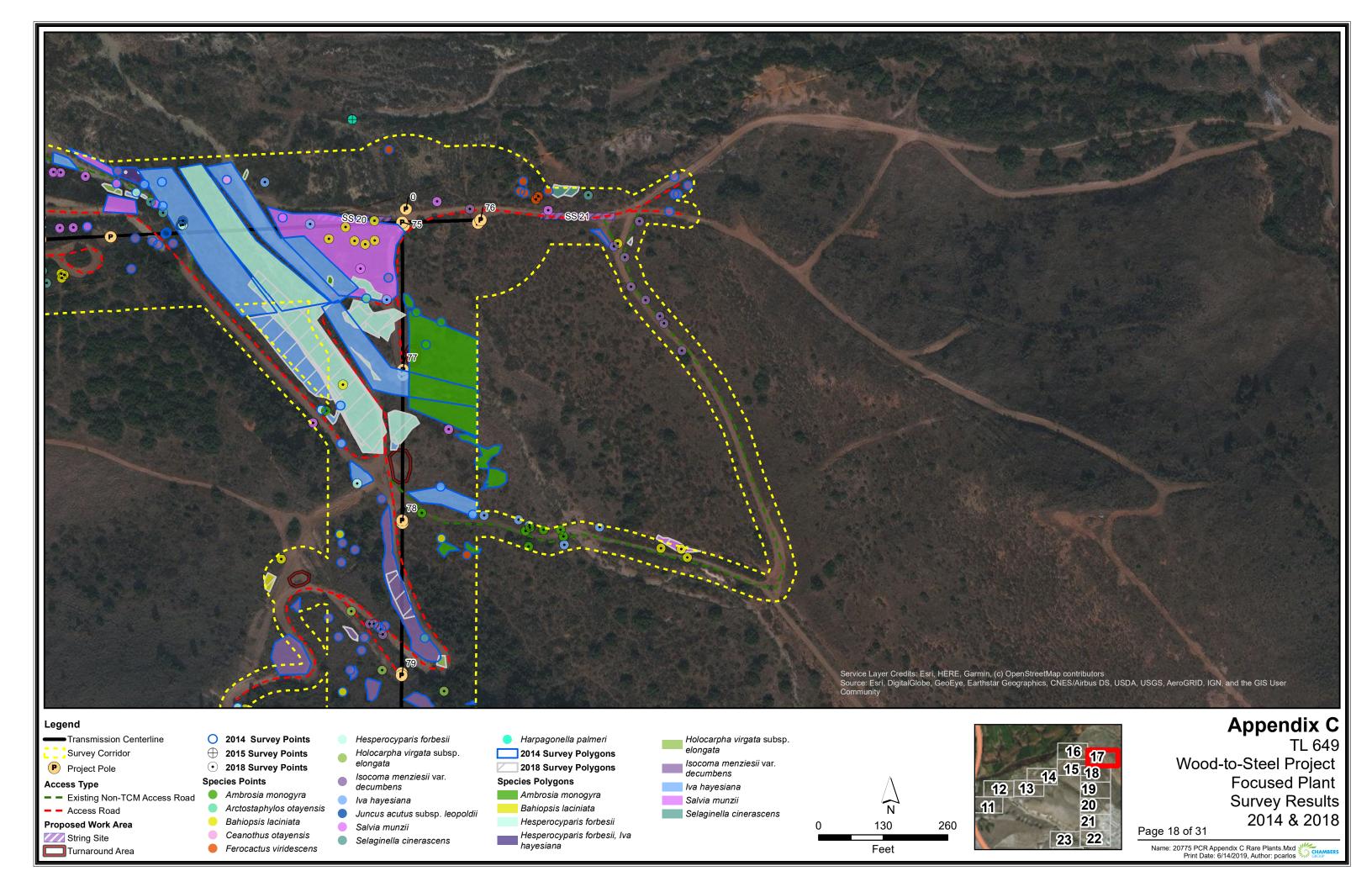


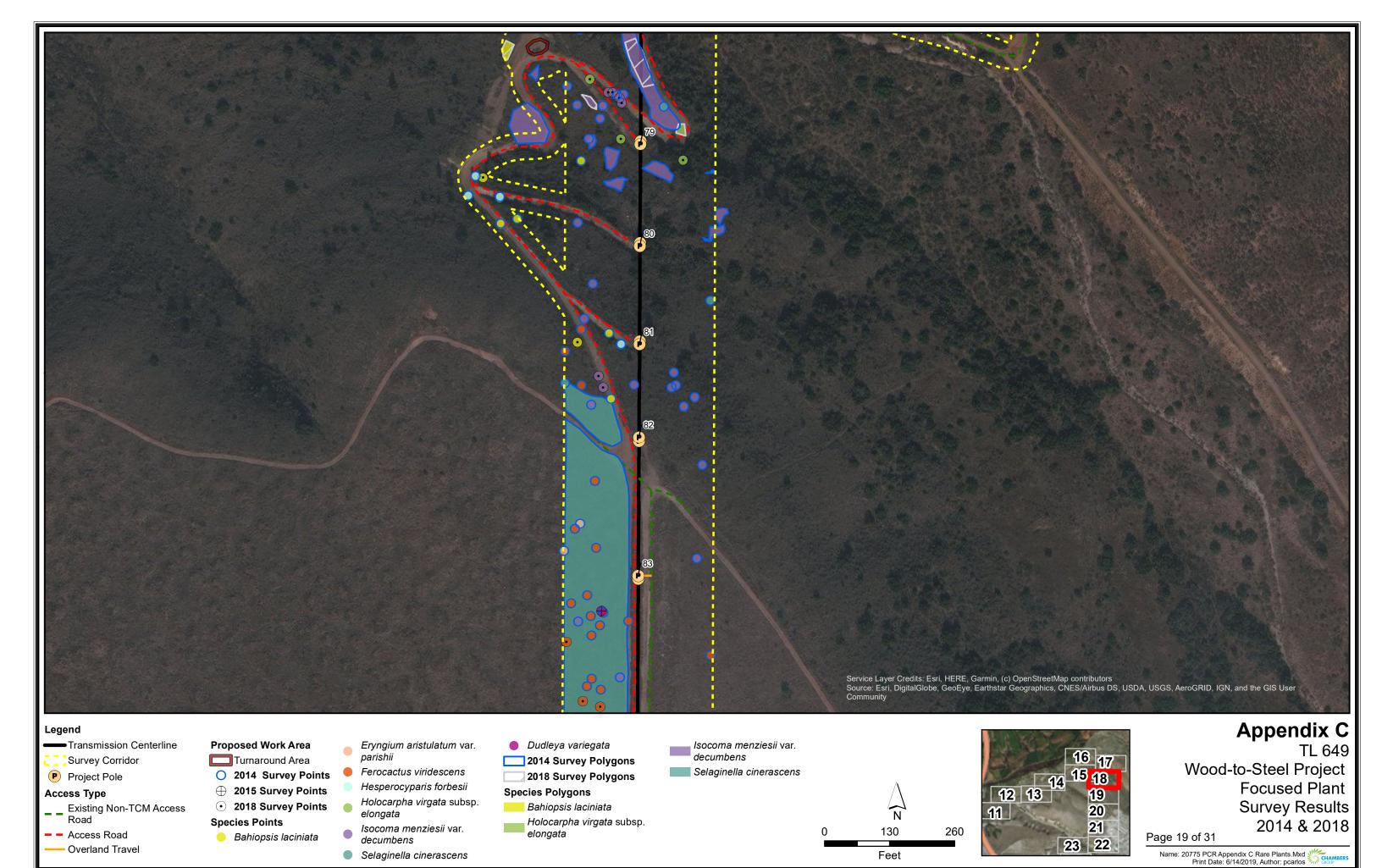


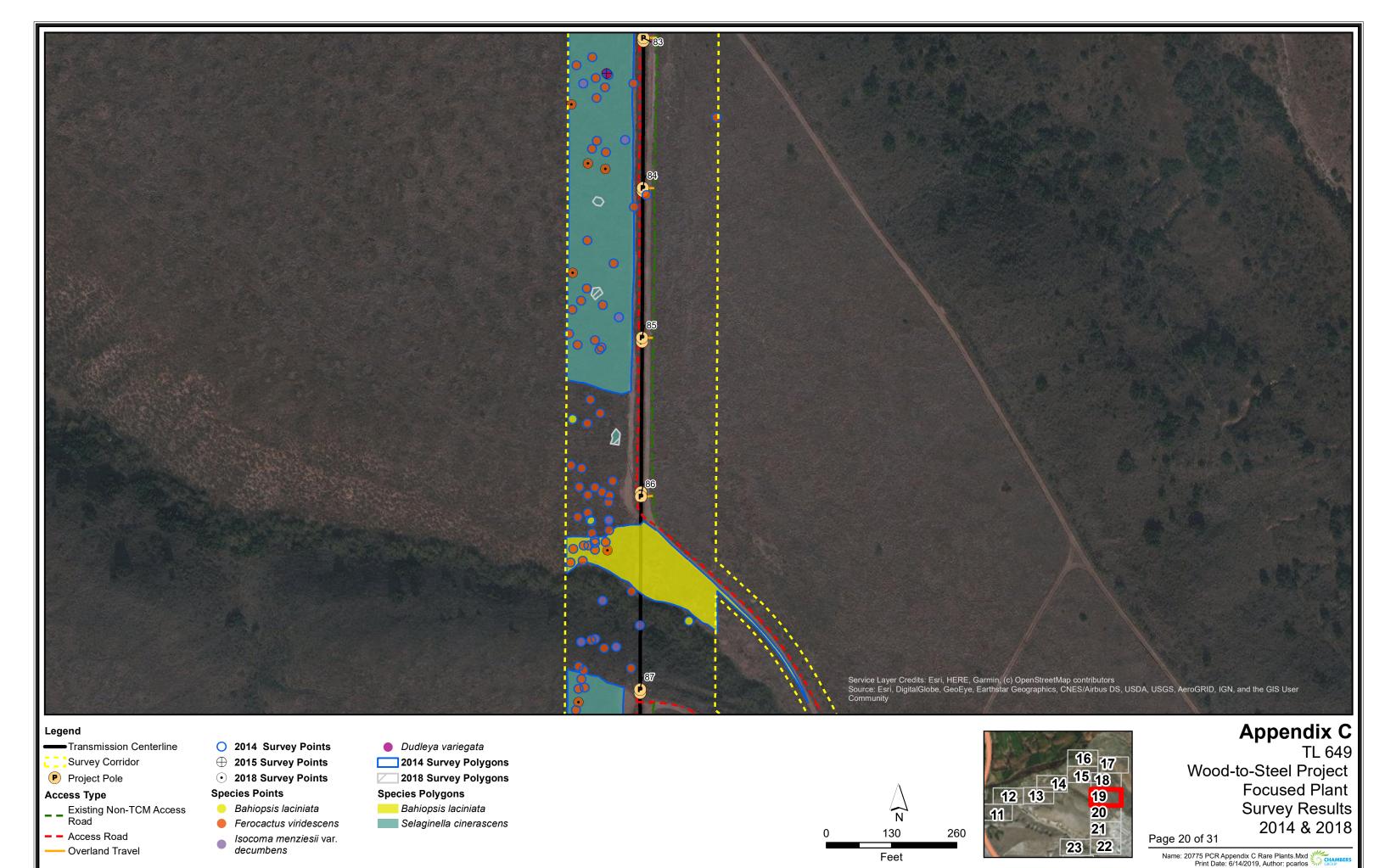


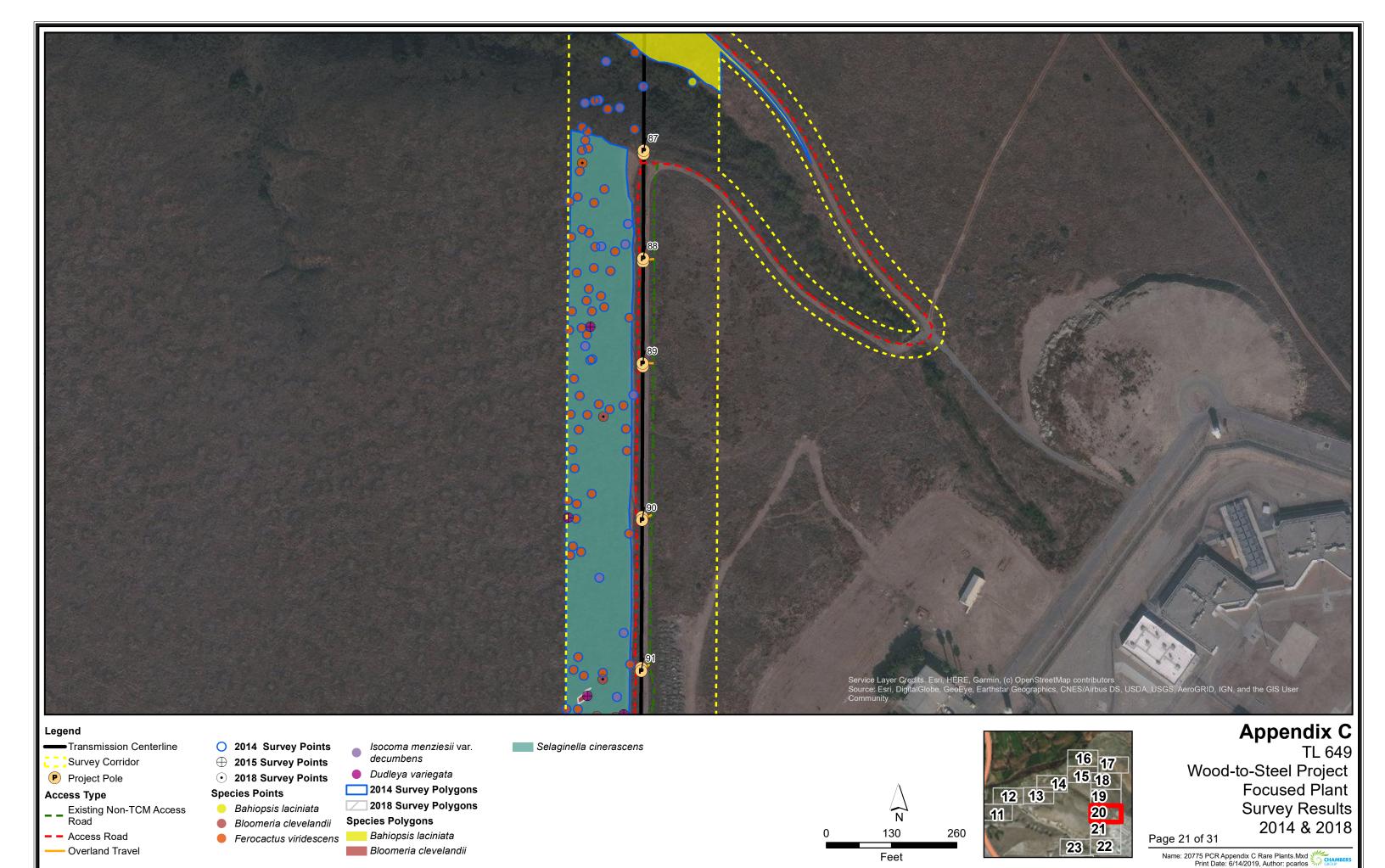


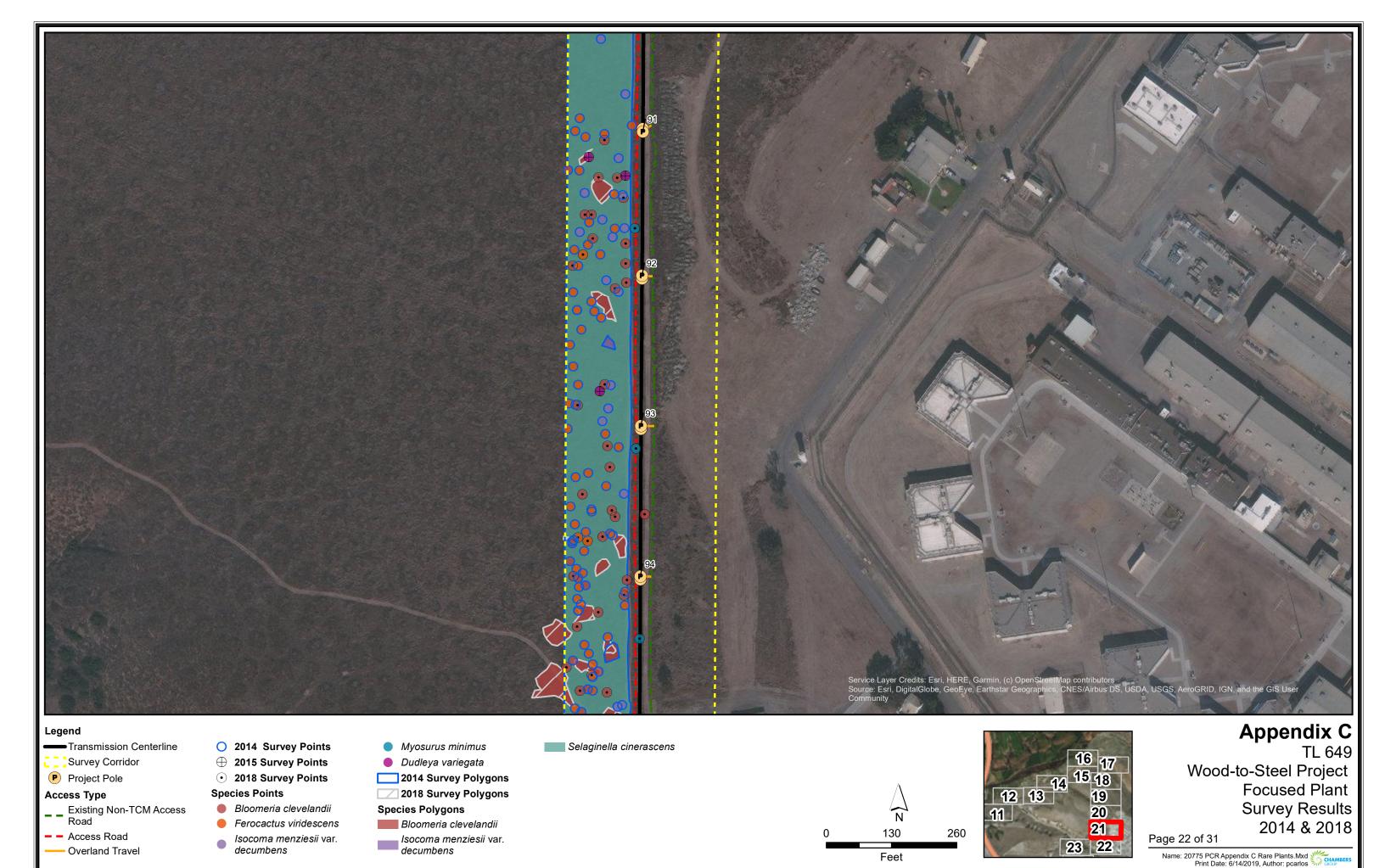


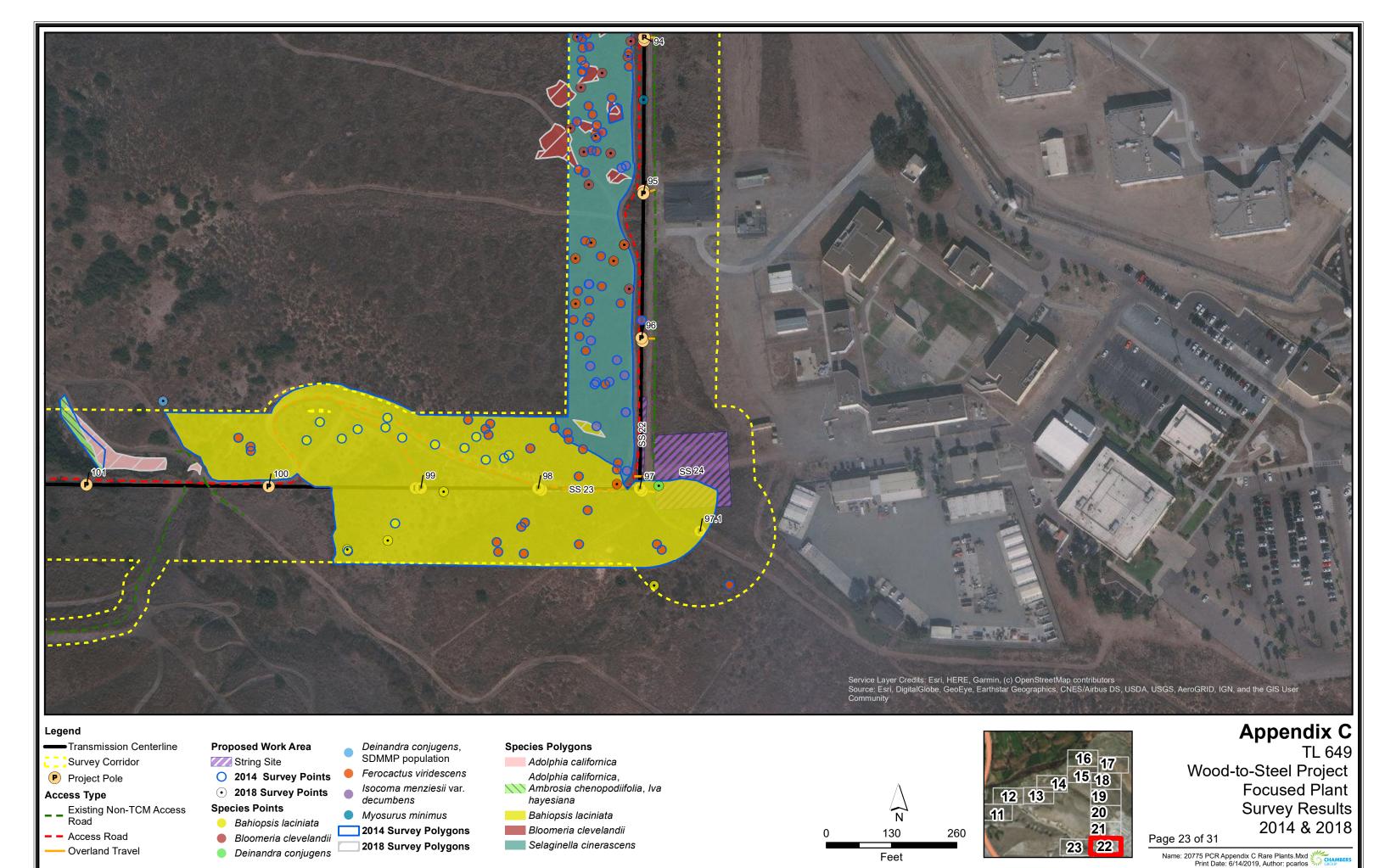


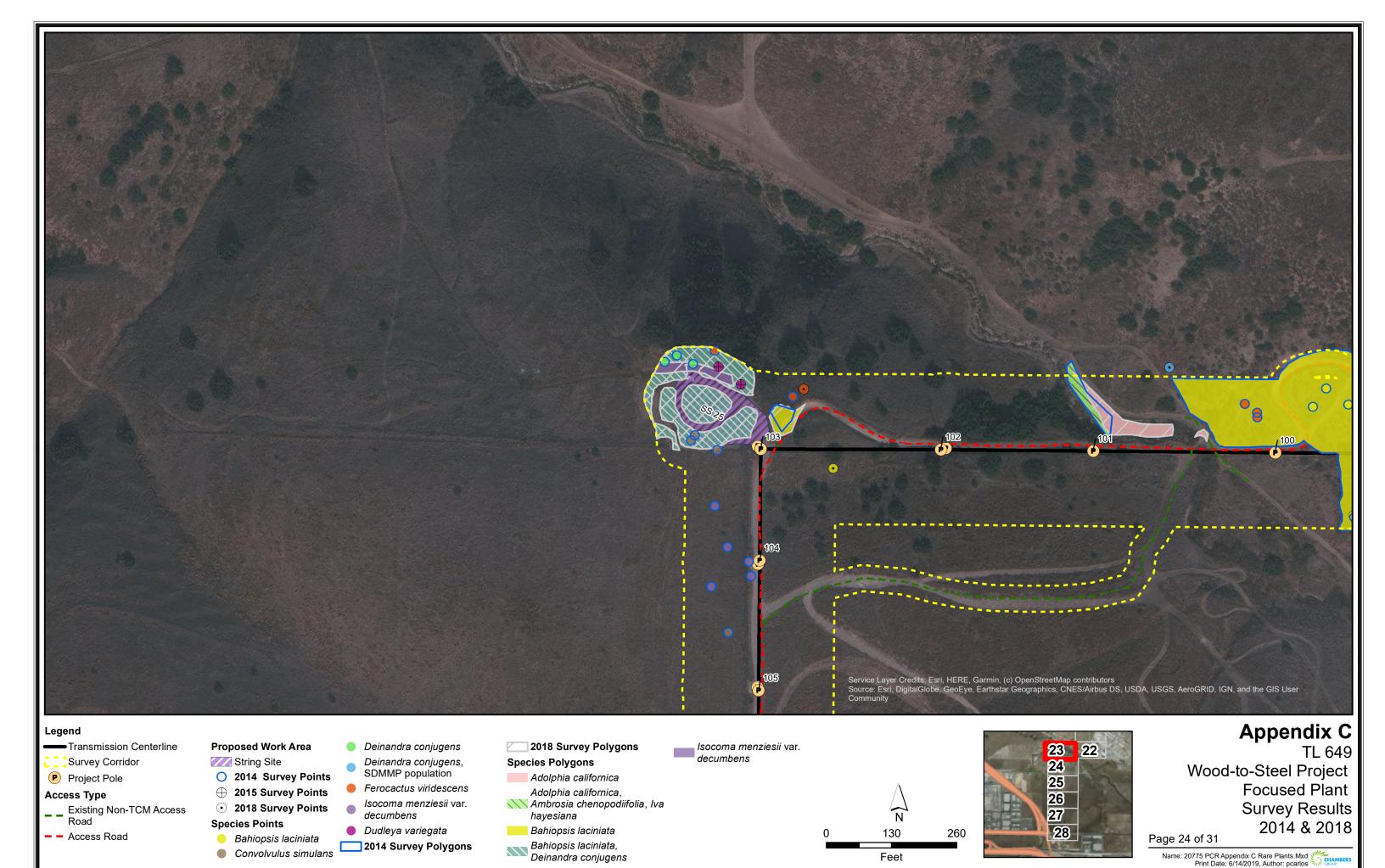


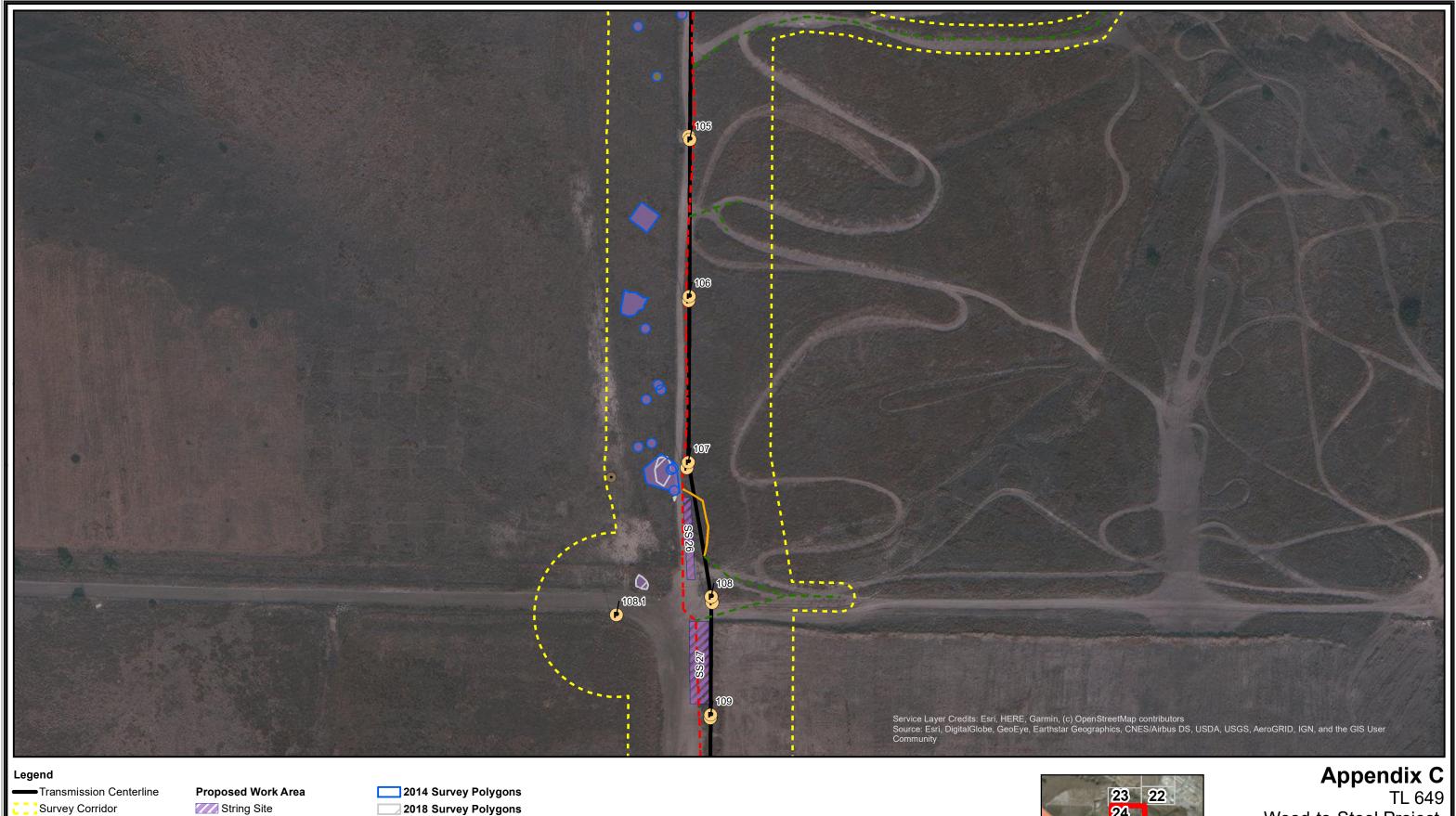












Survey Corridor

Project Pole

Access Type

Existing Non-TCM Access Road

Access Road

Overland Travel

String Site

O 2014 Survey Points

• 2018 Survey Points **Species Points**

Convolvulus simulans

Isocoma menziesii var. decumbens

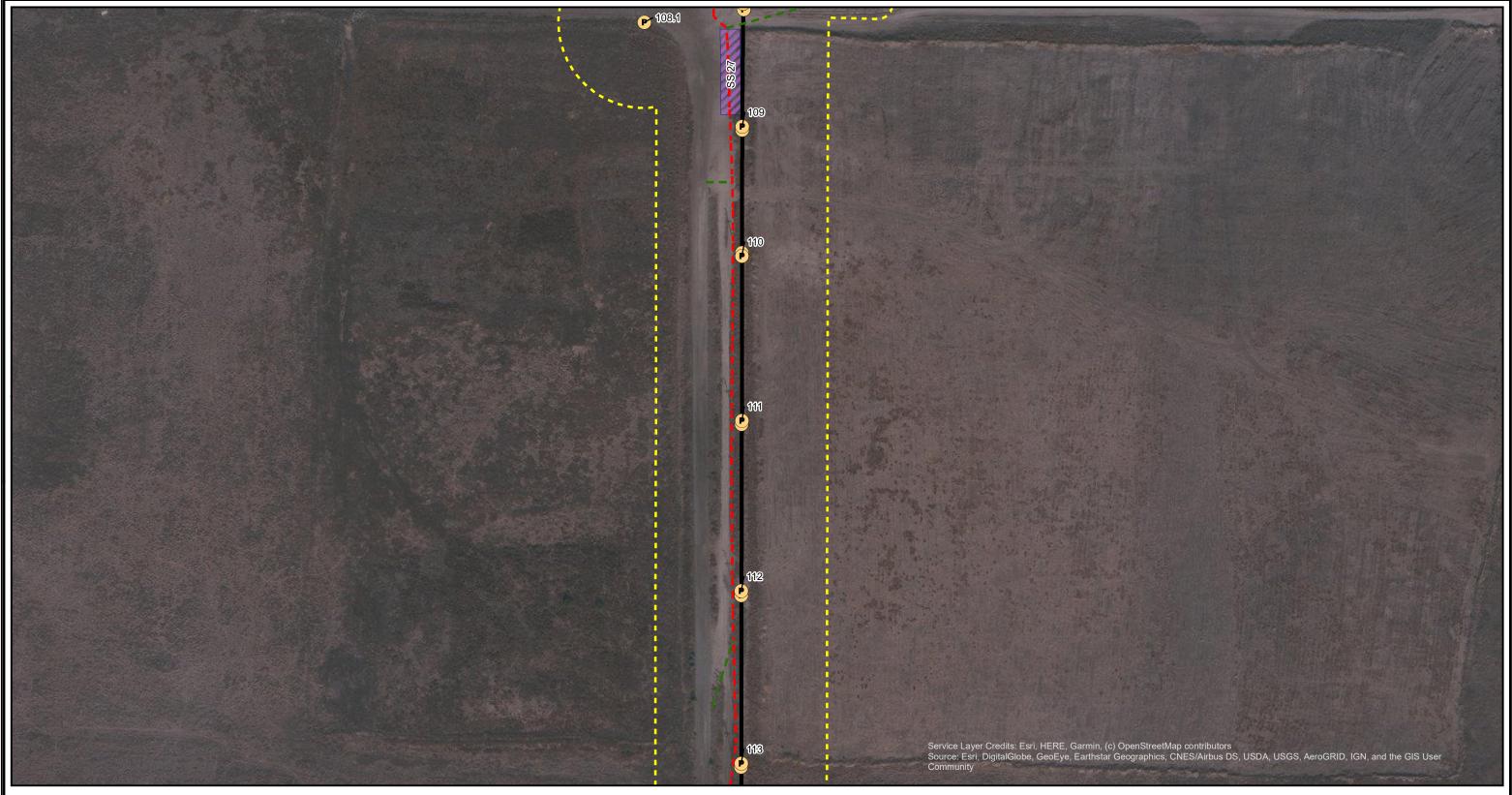
Species Polygons

Isocoma menziesii var. decumbens

23 22 24 27 28 130 260 Feet

Wood-to-Steel Project Focused Plant Survey Results 2014 & 2018

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Transmission Centerline

Survey Corridor Project Pole

Access Type

Existing Non-TCM Access Road

Access Road

Proposed Work Area

String Site

130 260

23 22 24 26 27 28

Feet

Appendix C TL 649 Wood-to-Steel Project Focused Plant Survey Results 2014 & 2018

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Legend

Transmission Centerline Survey Corridor

Project Pole

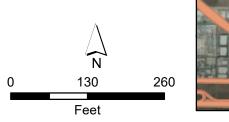
Access Type

Existing Non-TCM Access Road

Access Road

Proposed Work Area



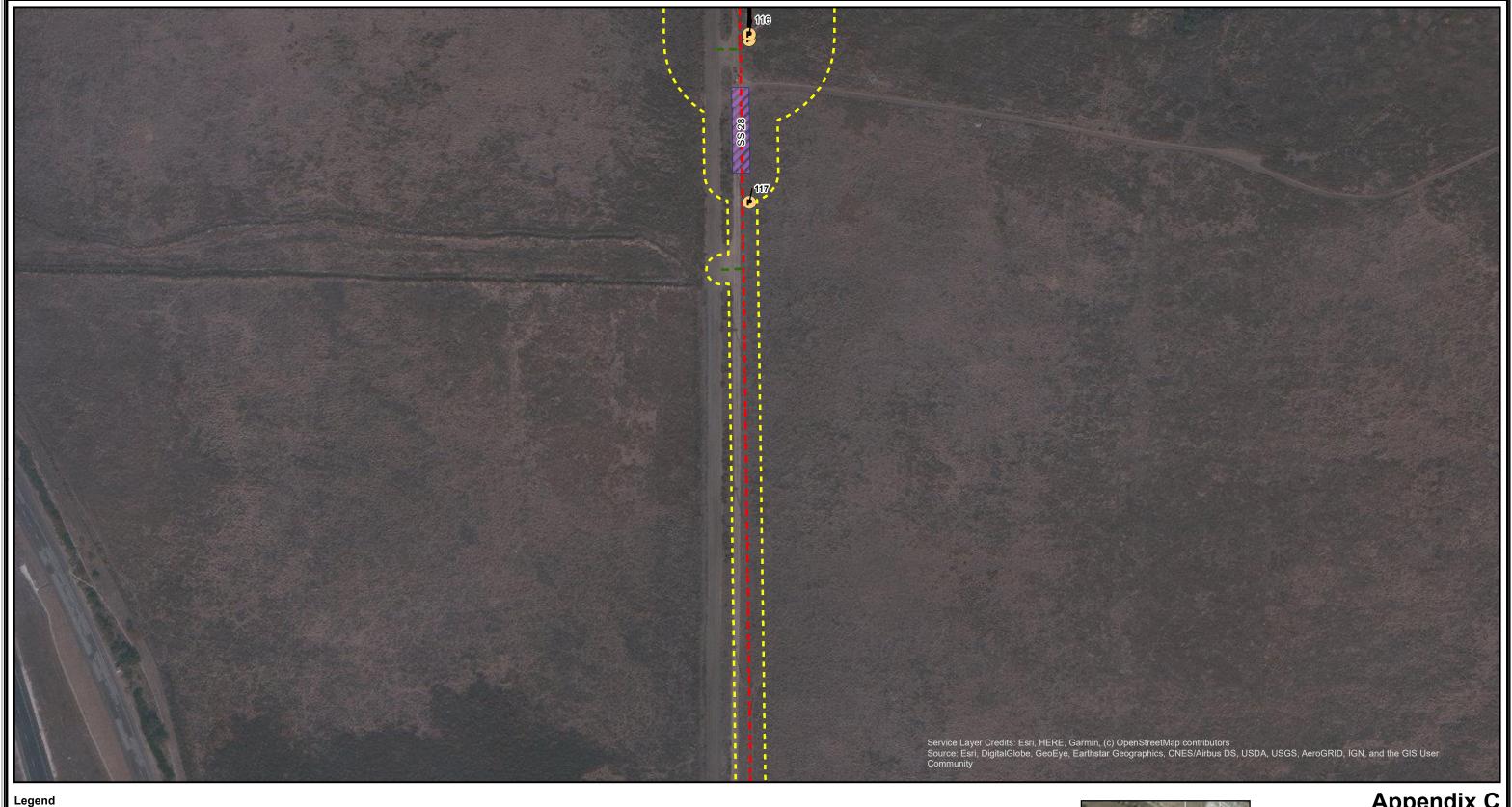




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Wood-to-Steel Project Focused Plant Survey Results 2014 & 2018

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Transmission Centerline

Survey Corridor

Project Pole

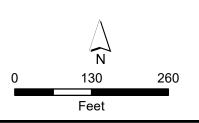
Access Type

Existing Non-TCM Access Road

Access Road

Proposed Work Area

String Site

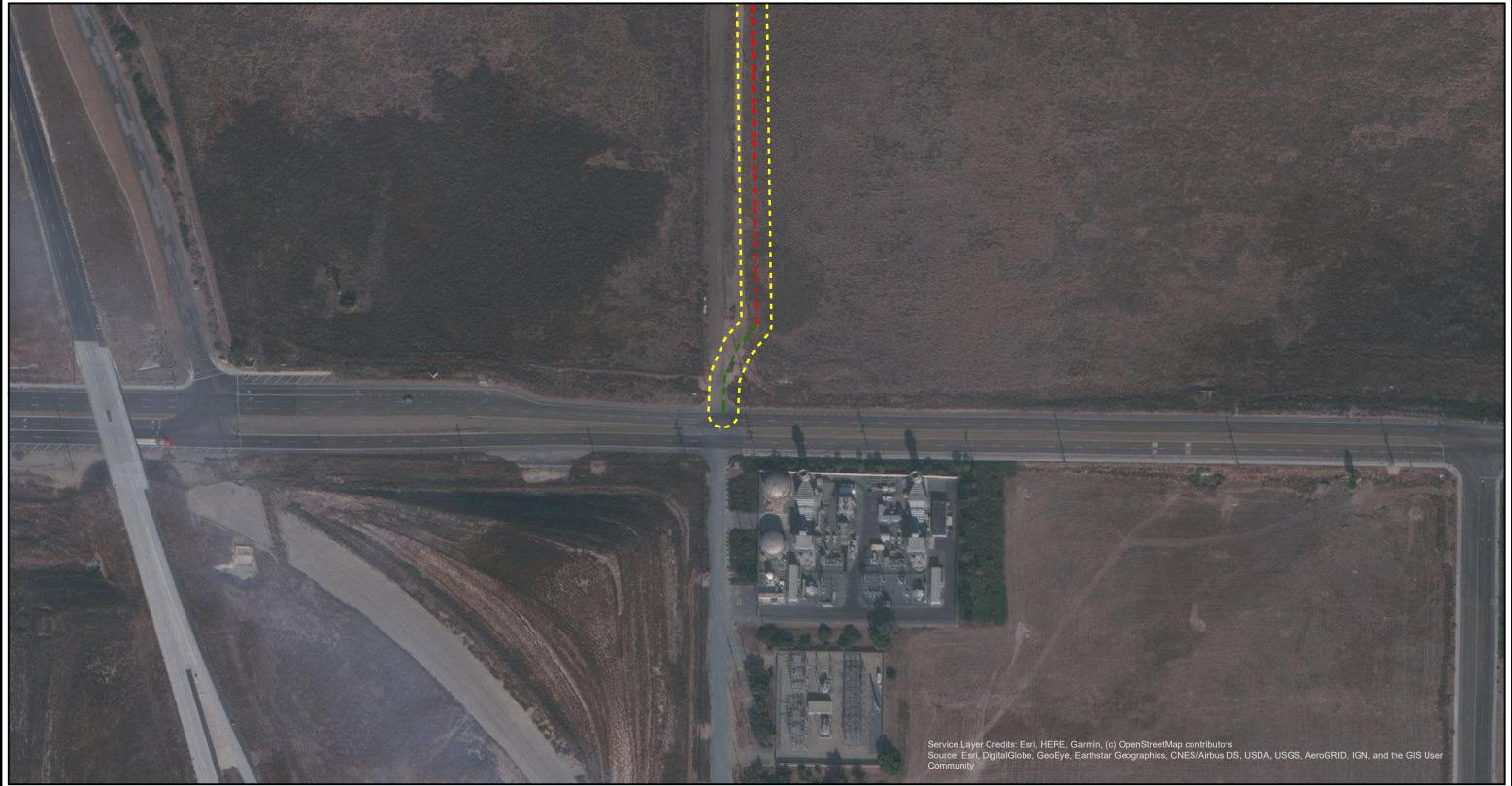


23 22 24 26 27 28

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Wood-to-Steel Project Focused Plant Survey Results 2014 & 2018

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Legend

Survey Corridor

Access Type

- Existing Non-TCM Access Road
- Access Road



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Survey Corridor

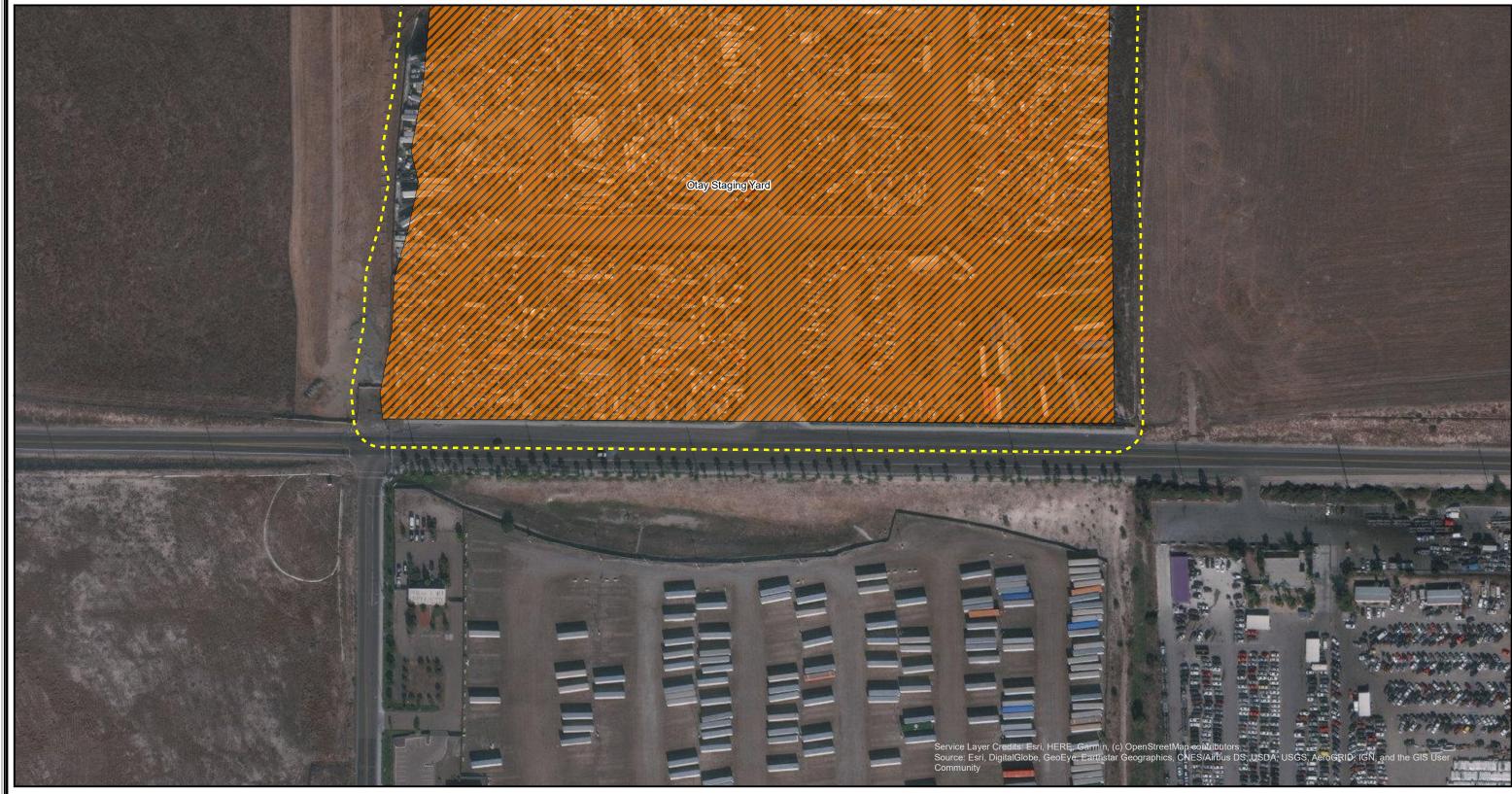
Proposed Work Area

Staging Yard

24 25 26 27 29 30 130 260 Feet

Appendix C TL 649 Wood-to-Steel Project Focused Plant Survey Results 2014 & 2018

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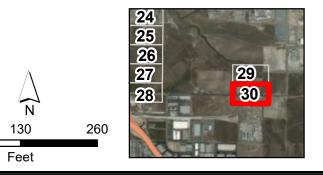


Legend

Survey Corridor

Proposed Work Area

Staging Yard



Appendix C TL 649 Wood-to-Steel Project Focused Plant Survey Results 2014 & 2018

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ATTACHMENT A - REPRESENTATIVE SPECIES PHOTOGRAPHS



Photo 1: Spineshrub (Adolphia californica) -CRPR 2B.1



Photo 2: San Diego bur-sage (Ambrosia chenopodiifolia) - CRPR 2B.1



Photo 3: Leafy burrobush (Ambrosia monogyra) -CRPR 2B.2



Photo 4: Otay manzanita (Arctostaphylos otayensis) -CRPR 1B.2



Photo 5: Palmer's sagewort (*Artemisia* palmeri) -CRPR 4.2

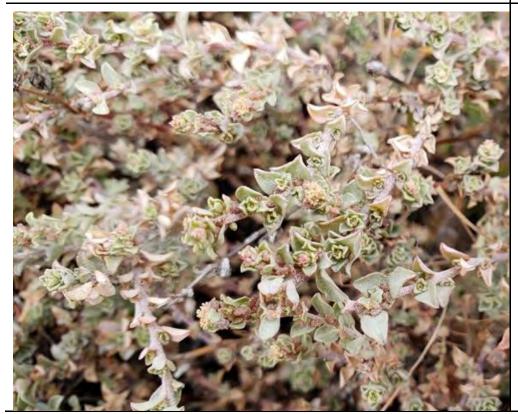


Photo 6: South Coast saltscale (Atriplex pacifica) - CRPR 1B.2



Photo 7: San Diego sunflower (Bahiopsis [Viguiera] laciniata) -CRPR 4.3



Photo 8:
Golden-club
cactus
(Bergerocactus
emoryi) - CRPR
2B.2, NCCPcovered



Photo 9: San Diego goldenstar (Bloomeria clevelandii) -CRPR 1B.1, NCCP-covered

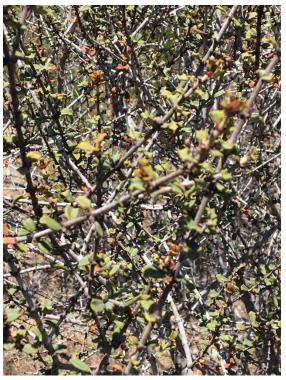


Photo 10: Otaylilac (*Ceanothus* otayensis) -CRPR 1B.2



Photo 11: Small-flower bindweed (Convolvulus simulans) -CRPR 4.2



Photo 12: Otay tarplant (Deinandra conjugens) - FT, CE, CRPR 1B.1, NCCP-covered



Photo 13: Orcutt's bird'sbeak (Dicranostegia orcuttiana) -CRPR 2B.1

NO PHOTO AVAILABLE

Photo 14: San
Diego buttoncelery
(Eryngium
aristulatum var.
parishii) - FE,
CE, CRPR 1B.1,
NCCP-covered



Photo 15: Cliff spurge (Euphorbia misera) -CRPR 2B.2



Photo 16: San Diego barrel cactus (Ferocactus viridescens) -CRPR 2B.1, NCCP-covered



Photo 17: Tecate cypress (Hesperocyparis forbesii) - CRPR 1B.1, NCCPcovered plant

NO PHOTO AVAILABLE

Photo 18: Virgate tarweed (Holocarpha virgata subsp. elongata)- CRPR 4.2



Photo 19: Decumbent goldenbush (Isocoma menziesii var. decumbens) -CRPR 1B.2



Photo 20: San Diego marshelder (Iva hayesiana) -CRPR 2B.2



Photo 21: Southwestern spiny-rush (Juncus acutus subsp. leopoldii) - CRPR 4.2



Photo 22: Little mousetail (Myosurus minimus subsp. apus) - CRPR 3.1, NCCPcovered



Photo 23: Small-leaf rose (Rosa minutifolia) -CE, CRPR 2B.1, NCCP-covered



Photo 24: Munz's sage (Salvia munzii) -CRPR 2B.2



Photo 25: Mesa spike-moss (Selaginella cinerascens) -CRPR 4.1