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MEMORANDUM

To:	Andy Flajole, Horizon West Transmission, LLC
From:	Lincoln Allen, Project Manager / Environmental Compliance Supervisor, SWCA
Date:	July 24, 2019
Re:	2019 Rare Plant Survey Results, Suncrest Reactive Power Support Project, San Diego County, California

INTRODUCTION

SWCA Environmental Consultants (SWCA) has prepared this memorandum for Horizon West Transmission, LLC (HWT) in support of the Suncrest Reactive Power Support Project (Project) located in San Diego County, California. The purpose of this memorandum is to document the results of the rare plant surveys conducted by SWCA botanist, Alex Beakes on April 17 and 19, 2019. Information contained in this document is consistent with the California Public Utilities Commission requirements of Mitigation Measure (MM) BIO-2 (Perform Focused Surveys for Special Status Plants) of the Mitigation Monitoring and Reporting Program (MMRP) for the Suncrest Dynamic Reactive Power Support Project Final Environmental Impact Report (FEIR).

SURVEY METHODS

Pursuant to Mitigation Measure BIO-2 of the MMRP, "within 1 year before commencement of ground-disturbing activities, a qualified botanist shall perform surveys for special-status plant species with the potential to occur at the site. Floristic surveys will be performed according to the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (California Department of Fish and Wildlife [2018])."

A desktop analysis of potential special status plants was conducted prior to the first round of focused rare plant surveys in 2017 and 2018. The desktop analysis included queries of the California Natural Diversity Data Base (CNDDB), the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Conservation (IPAC) Report for the study area, and the California Native Plant Society (CNPS) Rare Plant Inventory (CDFW 2019, USFWS 2019, CNPS 2019). This list and past survey results were referenced by the SWCA botanist prior to conducting the 2019 focused rare plant surveys.

SWCA botanist, Alex Beakes, conducted the focused rare plant surveys consistent with requirements described in MM BIO-2. Within the Project footprint along Bell Bluff Trail, between the Suncrest SVC Pad and the existing SDG&E substation (construction area and 100-foot buffer), the botanist walked transects that were approximately 30 feet (9 meters) apart and visually surveyed for any signs of the targeted plant species; transect spacing was variable based on visibility, with transects closer together in areas with poor visibility caused by heavy cover in the

mid- and over-story. Sensitive plant species observed during the survey were documented by counting individuals, estimating numbers for larger populations, or characterizing the approximate population size, and recording a submeter Global Positioning System (GPS) location. For rhizomatous herbs (including *Monardella hypoleuca ssp. lantata*), plants were considered an "individual" if their above-ground structures were greater than 12 inches from the nearest neighboring plant of the same species. The botanist did not survey the Suncrest SVC Pad work area, as this part of the project was surveyed previously and is under active construction.

RESULTS

Two special status species were found within the survey area during the focused plant surveys: feltleaved monardella (*Monardella hypoleuca ssp. lanata*; CRPR 1B.2), and Engelmann oak (*Quercus engelmannii*; CRPR 4.2).

A total of 18 clusters (or potentially connected rhizomatous sprouts) of felt-leaved monardella, were identified during the surveys. Each population consisted of approximately 1 to 30 rhizomatous individuals (as defined in the methods section); individuals were indistinguishable from rhizomatous clusters without impacting the plants. The number of individuals and their spacing varied among the populations. The locations of these clusters are mapped in Figures 1-4.

A total of 93 Engelmann oak individuals were identified during the surveys. Prior surveys in 2017 and 2018 had mapped a single point with a population estimate where Engelmann oaks were present in groups. Additional efforts were placed in 2019 in creating a comprehensive inventory of each individual oak onsite using a sub-meter GPS. This has resulted in a higher number of oaks present onsite than previously documented. The locations of these oak trees are mapped in Figures 1-4. In addition, 16 Engelmann oak hybrid trees were identified during the surveys. These individuals were mapped as part of the rare plant surveys, however no additional protection is recommended for these trees (besides protection of root structures for oak trees per MM BIO-12).

Although San Diego sunflower (*Bahiopsis laciniata*; CRPR 4.3) individuals were observed during this survey, as well as in the 2017 and 2018 rare plant surveys, it is suspected that this species was introduced to the Project area when a restoration seed mix was used for revegetation after construction of the SDG&E Suncrest Substation. This species was observed in the same locations as previously documented in 2018, and no additional points were taken because the populations appeared to be the same as previously documented. However, this species was not in bloom during the survey and a survey during the blooming season may reveal newly recruited individuals beyond the restoration areas.

A complete inventory of all plant species observed within the survey area was prepared (see Floral Compendium below). No additional unexpected special status species or populations of known special status species were observed within the survey area during the focused plant surveys.

DISCUSSION AND RECOMMENDATIONS

Pursuant to the MMRP, BIO-3 (Avoid or Minimize Impacts on Special-Status Plant Species During Construction) HWT or their contractor(s) will install exclusion fencing to protect plants that remain in place. Locations of special-status plant populations will be clearly identified in the field by staking, flagging, or fencing. The plants will be monitored throughout the duration of construction to determine whether the project has resulted in adverse effects (direct or indirect), as determined

by a qualified botanist. If the botanist determines that special-status plants may have been adversely affected, HWT will implement measures to compensate for the impact as described in Mitigation Measure BIO-4.

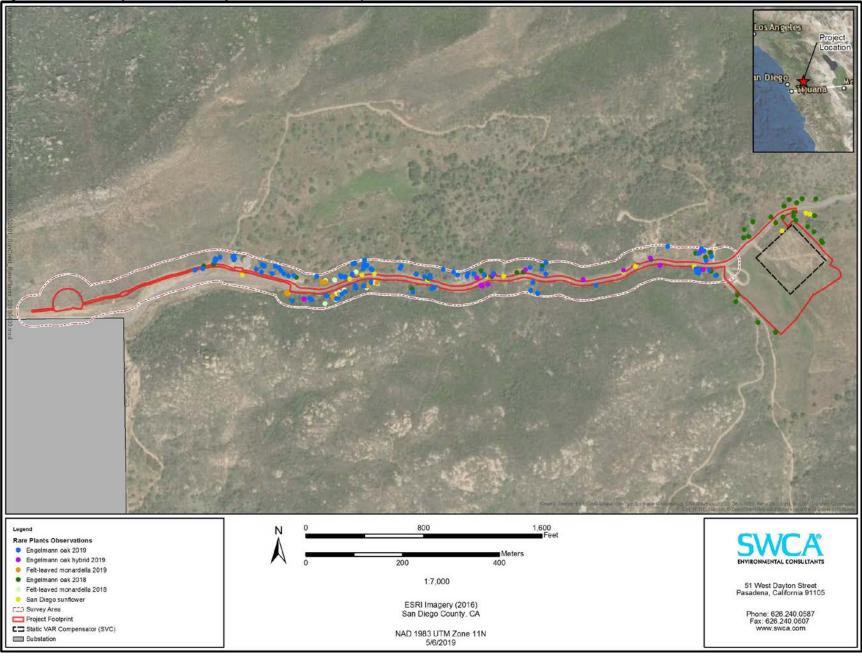
Adverse effects to special-status plant species can be avoided by utilizing the following recommendations:

- A Workers Environmental Awareness Program (WEAP) training shall be provided to all construction personnel to ensure on-site workers are aware of which special-status plants are onsite.
- A qualified biologist shall monitor installation of high-visibility fencing and grounddisturbing activities to ensure avoidance of all special-status plants. An avoidance buffer shall be established by a qualified biologist. This avoidance buffer will be made of high visibility fencing spaced 50 feet around felt-leaved monardella observations (Figure 3). Avoidance buffers are not needed in paved areas where felt-leaved monardella could not occur.
- All Engelmann oaks shall be flagged with high visibility material, and tree trimming will be limited to the minimum necessary for construction. If trimming is conducted it shall be done by a certified arborist.

REFERENCES

- California Department of Fish and Wildlife (CDFW). 2018. Protocols for Surveying and Evaluating Impacts to Specials Status Native Plant Populations and Natural Communities. Sacramento, CA. Available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959.
- California Department of Fish and Wildlife (CDFW). 2019. California Natural Diversity Database. California Department of Fish and Wildlife, Sacramento, CA.
- California Native Plant Society (CNPS). 2019. Inventory of Rare and Endangered Plants (online edition, v8-03 0.39). California Native Plant Society Rare Plant Program, Sacramento, CA. Available at: http://www.rareplants.cnps.org.
- United States Fish and Wildlife Service (USFWS). 2019. *Information for Planning and Conservation* (*IPaC*) report for the Proposed Project. Available at: https://ecos.fws.gov/ipac/project/4NBYJ-X2Q3R-EWBKL-JN6D3-JEQLVU.

Figure 1: 2019 survey area and survey results overview map.



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Figure 2. 2019 survey area results map, west side of the project area.

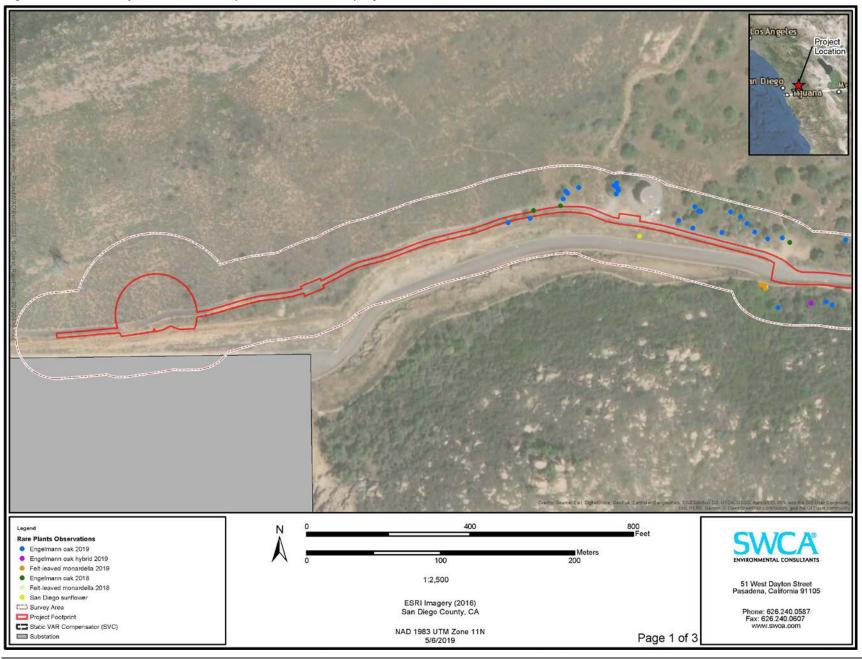
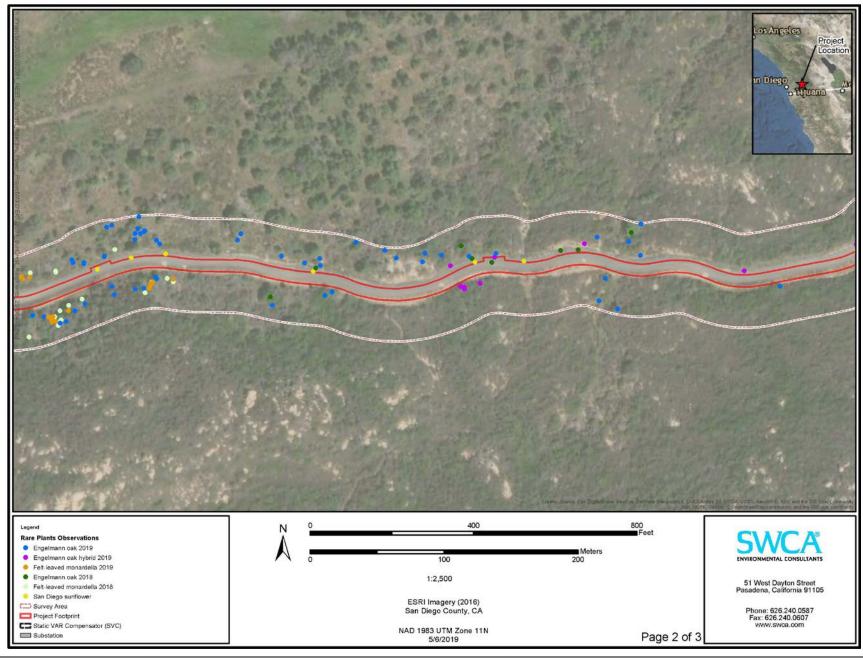
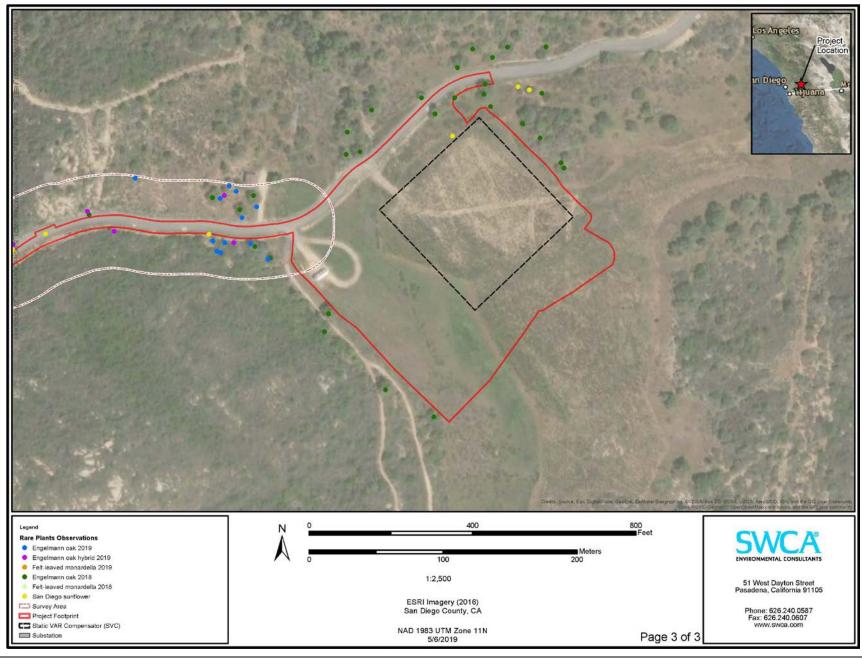


Figure 3. 2019 survey area results map, middle of the project area.



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Figure 4. 2019 survey area results map, east side of the project area.



FLORAL COMPENDIUM

Selaginellaceae Spike-Moss Family Selaginella bigelovii Bigelow's spike-moss Iycophyte Ferns Prake Family Myriopteris clevelandii Cleveland's lip fern pteridophyte Pelaea mucronata var. mucronata bird's foot cliff-brake pteridophyte Pentagramma triangularis ssp. triangularis California goldback fern pteridophyte Angiosperms (Eudicots) Adoxaceae Muskroot Family Adoxaceae Sumac or Cashew Family shrub Anacardiaceae Sumac or Cashew Family shrub Malosma laurina laurel sumac tree/shrub Rhus aromatica var. aromatica skunkbrush shrub Rhus ovata sugar bush shrub Apiaceae Carrot Family Apiaceae Apiaceae Dogbane Family annual herb Sanciula arguta sharp-toothed sancile perennial herb Sanciula crassicaulis Pacific sanicle perennial herb Sancula crassicaulis Pacific sanicle perennial herb Sancula crassicaulis Pacific sanicle perennial	Scientific Name	Common Name	Life Form
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	Micropus californicus var. californicus	slender cottonweed	annual herb
Pseudognaphalium spp. Everlasting perennial herb	Pseudognaphalium californicum	California everlasting	perennial herb
	Pseudognaphalium spp.	Everlasting	perennial herb

Solidago velutina ssp. CalifornicaOreja de LiebreSonchus asper ssp. asper*prickly sow thistleSonchus oleraceus*common sow thistleStephanomeria exigua ssp. deaneiDean's wirelettuceStephanomeria diegensisSan Diego milk asterUropappus lindleyisilver puffBoraginaceaeBorage FamilyAmsinckia intermediarancher's fiddleneckCryptantha intermediacommon forget-me-notCryptantha muricataprickly crypanthaNemophila menziesiibaby blue-eyesPectocarya linearis ssp. feroculasleeping combseedPhacelia distanswild heliotropePhacelia imbricata subsp. patulaimbricate phaceliaPlagiobothrys spp.Popcornflower	annual herb annual herb berennial herb berennial herb annual herb
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Plagiobothrys spp. Popcornflower	annual herb
	perennial herb
	annual herb
Plagiobothrys tenellus slender popcornflower	annual herb
Brassicaceae Mustard Family	
Athysanus pusillus dwarf athysanus	Annual herb
Hirschfeldia incana* shortpod mustard g	perennial herb
Lepidium spp. Pepper-grass	annual herb
Sisymbrium altissimum* tumble mustard	annual herb
Sisymbrium irio* London rocket	annual herb
Sisymbrium officionale* hedge mustard	annual herb

Scientific Name	Common Name	Life Form
Thysanocarpus curvipes	hairy fringe pod	annual herb
Turritis glabra	tower-mustard	perennial herb
Caprifoliaceae	Honeysuckle Family	
Lonicera subspicata var. denudata	Johnston's honeysuckle	shrub
Symphoricarpos mollis	creeping snowberry	shrub
Caryophyllaceae	Pink Family	
Cerastium glomeratum*	mouse-ear chickweed	annual herb
Silene gallica*	common catchfly	annual herb
Spergularia bocconi*	Boccone's sandspurrey	annual herb
Chenopodiaceae	Goosefoot Family	
Salsola australis*	Australian thistle	annual herb
Cistaceae	Rock-Rose Family	
Crocanthemum aldersonii	Alderson's rush-rose	shrub
Crassulaceae	Stonecrop Family	
Crassula connata	pygmy-weed	annual herb
Dudleya pulverulenta	chalk dudleya	perennial herb
Convolvulaceae	Morning-Glory Family	
Calystegia macrostegia	island morning glory	perennial herb/vine
Cuscuta californica	California dodder	annual herb/vine
Cucurbitaceae	Gourd Family	
Marah macrocarpa	wild cucumber	perennial herb/vine
Cyperaceae	Sedge Family	
Carex triquetra	Triangular fruit sedge	perennial grasslike herb
Ericaceae	Heath Family	
Arctostaphylos glauca	bigberry manzanita	shrub
Arctostaphylos glandulosa	Eastwood manzanita	shrub
Euphorbiaceae	Spurge Family	
Croton setiger	turkey-mullein	perennial herb
Euphorbia maculate	spotted spurge	annual herb

Scientific Name	Common Name	Life Form
Fabaceae	Legume Family	
Acmispon americanus var. americanus	Spanish clover	annual herb
Acmispon argophyllus var. argophyllus	silver-leaf lotus	perennial herb
Acmispon glaber var. brevialatus	short-wing deerweed	perennial herb
Acmispon micranthus	San Diego lotus	annual herb
Acmispon strigosus	strigose lotus	annual herb
Lathyrus vestitus var. alefeldii	San Diego sweet pea	perennial herb
Lupinus bicolor	miniature lupine	annual herb
Lupinus hirsutissimus	stinging lupine	annual herb
Lupinus concinnus	Bajada lupine	annual herb
Medicago polymorpha*	bur clover	annual herb
Melilotus indicus*	annual yellow sweetclover	annual herb
Trifolium willdenovii	Tomcat flower	annual herb
Vicia sp.	vetch	vine
Fagaceae	Oak Family	
Quercus agrifolia var. oxyadenia	interior coast live oak	tree
Quercus cornelius-mulleri	desert scrub oak	shrub
Quercus engelmannii [†]	Engelmann oak	tree
Quercus x acutidens	Hybrid: Q. engelmannii, Q. cornellius-mulleri	shrub
Geraniaceae	Geranium Family	
Erodium botrys*	broad-lobed filaree	annual herb
Erodium cicutarium*	red-stemmed filaree	annual herb
Lamiaceae	Mint Family	
Marrubium vulgare*	horehound	perennial herb
Monardella hypoleuca subsp. lanata $^{^{\dagger}}$	felt-leaf monardella	Perennial (rhizomatous) herb
Salvia apiana	white sage	shrub
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Salvia clevelandii	fragrant sage	shrub

Scientific Name	Common Name	Life Form
Scutellaria tuberosa	Danny's skullcap	perennial herb
Trichostema lanceaolata	vinegarweed	annual herb
Trichostema lanatum	woolly bluecurls	shrub
Malvaceae	Mallow Family	
Sidalcea sparsifolia	checker mallow	Perennial (rhizomatous herb
Montiaceae	Miner's Lettuce Family	
Calandrinia ciliata	red maids	annual herb
Claytonia perfoliata ssp. perfoliata	Miner's-lettuce	annual herb
Myrsinaceae	Myrsine Family	
Lysimachia arvensis*	scarlet pimpernel	annual herb
Onagraceae	Evening Primrose Family	
Camissonia strigulosa	field evening primrose	annual herb
Camissoniopsis bistorta	California sun cup	annual herb
Camissoniopsis hirtella	field sun cup	annual herb
Clarkia epilobioides	willow-herb clarkia	annual herb
Clarkia purpurea	winecup clarkia	annual herb
Orobanchaceae	Broom-Rape Family	
Castilleja exserta ssp. exserta	purple owl's-clover	annual herb
Castilleja foliolosa	woolly Indian paintbrush	perennial herb
Cordylanthus rigidus ssp. setigerus	bird's-beak	annual herb
Paeoniaceae	Peony Family	
Paeonia californica	California peony	perennial herb
Papaveraceae	Poppy Family	
Eschscholzia californica	California poppy	annual/perennial herb
Phrymaceae	Lopseed Family	
Diplaucus longiflorus	bush monkey-flower	shrub
Plantaginaceae	Plantain Family	
Keckiella ternata var. ternata	summer bush penstemon	shrub

Scientific Name	Common Name	Life Form
Penstemon centranthifolius	scarlet bugler	perennial herb
Penstemon spectabilis var. spectabilis	showy penstemon	perennial herb
Polemoniaceae	Phlox Family	
Eriastrum sapphirinum	sapphire eriastrum	annual herb
Gilia angelensis	angel gilia	annual herb
Gilia capitate	blue field gilia	annual herb
Leptosiphon pygmaeus ssp. continentalis	Pygmy linanthus	annual herb
Navarretia sp.	navarretia	annual herb
Polygonaceae	Buckwheat Family	
Chorizanthe procumbens	pala spineflower	annual herb
Eriogonum fasciculatum var. foliolosum	inland California buckwheat	shrub
Eriogonum fasciculatum var. polifolium	Mojave Desert California buckwheat	shrub
Polygonum aviculare ssp. depressum*	common knotweed, doorweed	annual/perennial herb
Pterostegia drymarioides	California thread-stem	annual herb
Rumex crispus*	curly dock	perennial herb
Ranunculaceae	Buttercup Family	
Delphinium spp.	larkspur	perennial herb
Thalictrum fendleri	meadow-rue	perennial herb
Rhamnaceae	Buckthorn Family	
Ceanothus leucodermis	chaparral whitethorn	shrub
Ceanothus oliganthus	hairy ceanothus	shrub
Ceanothus perplexans	cup-leaf-lilac	shrub
Rhamnus crocea	spiny redberry	shrub
Rhamnus ilicifolia	holly-leaf redberry	shrub
Rosaceae	Rose Family	
Adenostoma fasciculatum var. fasiculatum	chamise	shrub
Cercocarpus betuloides var. betuloides	birch-leaf mountain-mahogany	shrub
Heteromeles arbutifolia	toyon	shrub

Scientific Name	Common Name	Life Form
Prunus ilicifolia ssp. ilicifolia	islay, holly-leaf cherry	shrub
Rubiaceae	Madder Family	
Galium angustifolium	narrow leaved bedstraw	perennial herb
Galium aparine	goose grass	annual herb
Galium porrigens	climbing bedstraw	vine/shrub
Salicaceae	Willow Family	
Salix lasiolepis	arroyo willow	tree/shrub
Solanaceae	Nightshade Family	
Solanum xanti	chaparral nightshade	perennial herb, shrub
Tamaricaceae	Tamarisk Family	
Tamarix ramosissima*	Mediterranean tamarisk	shrub
Violaceae	Violet Family	
Viola purpurea ssp. quercetorum	oak yellow violet	perennial herb
Angiosperms (Monocots)		
Agavaceae	Agave Family	
Agave americana	century plant	perennial herb
Chlorogalum pomeridianum var. pomeridianum	wavy-leaf soap-plant/amole	perennial herb
Hesperoyucca whipplei	our lord's candle	shrub
Yucca schidigera	Mojave yucca	tree
Cyperaceae	Sedge Family	
Carex sp.	sedge	perennial herb
Iridaceae	Iris Family	
Sisyrinchium bellum	blue-eyed grass	perennial herb
Juncaceae	Rush Family	
Juncus balticus ssp. ater	Baltic rush	perennial herb
Liliaceae	Lily Family	
Calochortus splendens	splendid mariposa lily	perennial herb
Poaceae	Grass Family	

Scientific Name	Common Name	Life Form
Avena barbata*	slender wild oat	annual/perennial grass
Avena fatua*	wild oat	annual grass
Bromus diandrus*	ripgut grass	annual grass
Bromus hordeaceus*	soft chess	annual grass
Bromus madritensis ssp. rubens*	red brome	annual grass
Bromus tectorum*	cheat grass	annual grass
Cynodon dactylon	Bermuda grass	perennial grass
Elymus triticoides	beardless wildrye	perennial grass
Festuca microstachys	small fescue	annual grass
Festuca myuros*	fescue	annual grass
Melica imperfecta	coast range melic	perennial grass
Muhlenbergia rigens	deergrass	perennial grass
Phalaris minor*	Mediterranean canary grass	annual grass
Polypogon monospilensis*	rabbitsfoot grass	annual grass
Schismus barbatus*	Mediterranean schismus	annual grass
Stipa coronata	giant needlegrass	perennial grass
Stipa miliacea var. miliacea	smilo grass	perennial grass
Stipa pulchra	purple needlegrass	perennial grass
Themidaceae	Brodiaea Family	
Dichelostemma capitatum ssp. capitatum	blue dicks	perennial herb

* Non-Native Species † Special Status Species