Attachment 2

APPENDIX A

Detailed Route Maps

































APPENDIX B

Biological Resources

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Biological Resources

Vegetation Maps

Vernal Pools and Wetlands Maps

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Sycamore to Peñasquitos 230 kV Minor Project Refinement 8 (MPR No. 8) – Non-NCCP Special Status Plant Species Accounts A.14-04-011 ALJ/HSY/ilz

species, all were evaluated in the FEIR, with the exception of Cambell's liverwort, salt spring checkerbloom, bottle liverwort, and coastal whiptail. The first three of individually by species in the FEIR, the FEIR assessment of impacts to special-status reptile species can be considered inclusive of this species, and mitigation According to the California Natural Diversity Database, the following non-NCCP covered species have been recorded within 1 mile of the Project. Of these these species are not anticipated to occur within MPR #8 work areas. While coastal whiptail has the potential to occur and was not previously identified per the FEIR would offset any potential impact.

			Plant Species
		Primary Habitat	
Species	Status¹	Association	Potential to Occur/Comments
California adolphia	CRPR 2B.1	Dry slopes, chaparral,	This species is not expected to occur in the work areas, as it was not observed during
(Adolphia californica)		coastal	the survey, and would have been observed if present.
		sage scrub, grassland	
San Diego sagewort	CRPR 4.2	Drainages in chaparral,	Observed immediately west of the access road between poles P479043 and P479044,
(איז האוווטו שמוווטו א		sade scrub rinarian	snedies was observed adjacent to Rose Creek builtoutside of any of the work areas
		mesic and	The areas where this species is present will not be accessed for Project activities and
		sandy soils	species will be flagged for avoidance. As a result, no impacts to this species are anticipated.
Summer holly	CRPR 1B.2	Chaparral, cismontane	This species is not expected to occur in the work areas, as it was not observed during
(Comarostaphylis		woodland	the survey, and would have been observed if present.
diversifolia ssp. diversifolia)			
Campbell's liverwort	CRPR 1B.1	Shady areas in moist	Not expected to grow within any of the coastal sage scrub within the work areas at
(Geothallus tuberosus)		coastal sage scrub	poles Z479049, Z479050, GS-23, or GS-25, as the coastal sage scrub within these
		habitat and vernal pools	areas is relatively open and dry. While potentially suitable habitat occurs in the
			understory of derise snaded polson oak (<i>Toxicoderturor) diversitioburn</i>) within a total of 16 scillare feet of the work area of GS-21, this species is not expected to occilr as if is
			only known from a locality in the Project vicinity, and is not known to occur within the
			Project area. Therefore, no impacts to this species are anticipated as a result of
			Project-related activities.

A.14-04-011 ALJ/HSY/iiz Sycamore to Peñasquitos 230 kV Minor Project Refinement 8 (MPR No. 8) – Non-NCCP Special Status Plant Species Accounts

Plant Species	Primary Habitat Potential to Occur/Comments	Clay soils in chaparral, Observed during the survey, although not documented by the CNDDB within one mile cismontane woodland, cismontane woodland, coastal of the project. This species was locally abundant within the surrounding areas of the Project, and individuals were observed within the work areas at poles Z479046 and sage scrub, grassland, 2479047, as well as within portions of the access roads throughout the project, some of which are asolided by maintenance disturbed areas at in the FEIR, because of the lower sensitivity of this species, and low number of individuals impacted by the proposed Project, impacts would be less than significant. No mitigation is required.	1Coastal salt marsh,Unlikely to occur in the road due to the high amount of disturbance. Potentially suitable habitat for this species occurs east of poles Z479049 and Z479050; however, this area will not be accessed for Project activities. This species was not detected during the field survey, and no impacts are anticipated.	Chaparral, coastal sage Potentially suitable for this species occurs within portions of the work areas at poles scrub Z479049, Z479050, GS-21, GS-23, and GS-25. It was not detected due to the time of year of survey. As stated in the FEIR, because of the lower sensitivity of this species, and small areas within which individuals could potentially be impacted by the proposed Project, impacts would be less than significant. Impacts from the proposed Project would not significantly impact the populations of these species. No mitigation is required.	1Sandy or clay soils in immediately adjacent to GS-21, and approximately 30 feet north of pole P479046, coastal sage scrub, and along the access road and east perimeter of the work area. Individuals will be flagged for avoidance, prior to construction. Therefore, impacts to this species are not anticipated.	2 Wetland habitats within Habitat suitable for this species does not occur within any of the project sites or chaparral, coastal sage access roads. scrub, yellow pine forests, and riparian
	Status ¹ A	CRPR 4.2 C ci sc al di	CRPR 1B.1 C	CRPR 4.3 C	CRPR 1B.1 S	CRPR 2B.2 V
	Species	Graceful tarplant (Holocarpha virgata ssp. elongata)	Coulter's goldfields (Lasthenia glabrata ssp. coulteri)	Robinson's peppergrass (Lepidium virginicum var. robinsonii)	Nuttall's scrub oak (Quercus dumosa)	Salt spring checkerbloom (Sidalcea neomexicana)

Sycamore to Peñasquitos 230 kV Minor Project Refinement 8 (MPR No. 8) – Non-NCCP Special Status Plant Species Accounts A.14-04-011 ALJ/HSY/ilz

Plant Species	Potential to Occur/Comments	Not expected to grow within any of the coastal sage scrub within the work areas at poles Z479049, Z479050, GS-23, or GS-25, as the coastal sage scrub within these areas is relatively open and dry. While potentially suitable habitat occurs in the understory of dense shaded poison oak (<i>Toxicodendron diversilobum</i>) within a total of 16 square feet of the work area of GS-21, this species is not expected to occur as it is only known from a locality in the Project vicinity, and is not known to occur within the Project vicinity.	Mildlife Species	Potential to Occur/Comments	Habitat potentially suitable for this species occurs throughout the project area, including sites containing coastal sage scrub and access roads adjacent to coastal	sage scrub and chaparral habitats. With implementation of the mitigation measures outlined in the FEIR, no significant impacts to this species are anticipated.	
	Primary Habitat Association	Coastal sage scrub		Primary Habitat Association	Occurs in coastal southern California	from sea level to 7,000 above mean sea level.	It prefers dry open areas in chaparral or
	tatus ¹	;RPR 1B.1		Status ¹	SSC		
	Species	Bottle liverwort (Sphaerocarpos drewei)		Species	Coastal whiptail (Aspidoscelis tigris	stejnegeri)	

¹Status: CRPR = California Rare Plant Rank SSC = California Department of Fish and Wildlife Species of Special Concern

coastal sage scrub with relatively sparse

foliage

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eTS Number	25459	Task Tracker Number			
Project Name	Sycamore-Peñasquitos 230-kV Transmission Line Project				
DPSS					

Proposed Work Description

San Diego Gas and Electric (SDG&E) proposes to access 16 poles and utilize 14 work areas for guard structures (GS) for overhead work as part of the Sycamore-Peñasquitos 230-kV Transmission Line Project (Project). The linear alignment of the poles and guard structures is located parallel to Interstate 805 (I-805) between Carrol Canyon Road and Governor Drive and partially within Marine Corps Air Station (MCAS) Miramar in western San Diego County. The purpose of this pre-activity survey is to review and analyze potential biological resource impacts associated with the proposed Project activities.

The Project is located between the existing Peñasquitos and Sycamore Canyon substations in San Diego, CA (United States Geological Survey Del Mar and Poway 7.5-minute quadrangles). The Project originates from the Peñasquitos substation, south of Carmel Mountain Road, and extends southeast to I-805 and Carroll Canyon Road. The alignment follows Carroll Canyon Road until extending slightly north of Miramar Road through commercial development before it reaches Interstate-15 (I-15). At I-15, the alignment follows Pomerado Road to Stonebridge Parkway and terminates at the Sycamore Canyon substation on MCAS Miramar.

The Project consists of the construction and operation of a 230-kV transmission line between the existing Sycamore Canyon and Peñasquitos substations. The 14-mile long project alignment has been divided into three segments and spans developed and open space areas. The segments are divided into the following components:

- Segment A overhead alignment between Sycamore Canyon Substation and Stonecroft Trail within existing SDG&E right-of-way. One 230-kV steel cable pole will be constructed near Stonecroft Trail, and the existing 138-kV H-frame structure will be replaced with a steel H-frame dead-end structure.
- Segment B underground alignment originating from the 230-kV cable pole near Stonecroft Trail and constructed within existing roads to Carroll Canyon Road.
- Segment C overhead alignment between Peñasquitos substation and Carroll Canyon Road. One 230-kV steel cable pole will be constructed near Carroll Canyon road at the transition from overhead to underground.

A PSR for the Sycamore-Peñasquitos 230-kV Transmission Line Project was prepared and approved by the CDFW, USFWS, and CPUC in March of 2017. As part of the Project, SDG&E must now access 16 poles that run south of Segment C, in order to re-sag wire, equalize tension, and properly balance loads south of CC MM CP to the next dead-end structure. Project sites to be accessed for this overhead work are listed below in Table 1.

Site	Proposed Access	Biological Constraints
Z479040	Truck access from dirt road in Village	
	Nursery.	
7/790/1	Truck access from dirt road in Village	
2473041	Nursery.	
7/700/2	Truck access from dirt road in Village	
2473042	Nursery.	
7470043	Truck access from spur road off of dirt road	Pre-construction nesting bird survey
2479043	in Village Nursery.	(Feb 15-Aug 31).
Z479044	Truck access from spur road off of dirt road	Pre-construction nesting bird survey

Table 1. Project Sites

SDG&E NCCP Pre-activit	y Survey Report Text Form
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	in Village Nursery.	(Feb 15-Aug 31).
Z479045	Truck access from spur road off of dirt road from Nobel Drive.	Pre-construction nesting bird survey (Feb 15-Aug 31).
Z479046	Truck access from dirt road off of Nobel Drive.	Pre-construction nesting bird survey (Feb 15-Aug 31).
Z479047	Overland travel from dirt road off of Nobel Drive.	Pre-construction nesting bird survey (Feb 15-Aug 31).
Z479048	Truck access from dirt road off of Nobel Drive only. Access from Miramar Road is too steep for vehicles.	Pre-construction nesting bird survey (Feb 15-Aug 31).
		Pre-construction nesting bird survey (Feb 15-Aug 31).
Z479049	Truck access from dirt road off of Miramar Road.	Pre-construction survey for San Diego goldenstar if work occurs during blooming season of April to May
Z479050	Truck access from dirt road off of Miramar Road.	Pre-construction nesting bird survey (Feb 15-Aug 31). Pre-construction survey for San Diego goldenstar if work occurs during blooming season of April to May
Z479051	Truck access from dirt road off of Miramar Road.	Pre-construction nesting bird survey (Feb 15-Aug 31).
Z479052	Truck access from dirt road off of Eastgate Mall Road.	Pre-construction nesting bird survey (Feb 15-Aug 31).
Z479053	Truck access from dirt road off of Eastgate Mall Road.	Pre-construction nesting bird survey (Feb 15-Aug 31).
Z479054	Truck access from dirt road off of Eastgate Mall Road.	Pre-construction nesting bird survey (Feb 15-Aug 31).
Z479055	Truck access from dirt road off of Eastgate Mall Road.	Pre-construction nesting bird survey (Feb 15-Aug 31).

Additionally, 14 work sites will be necessary to install guard structures to protect roadways, a railway, and distribution lines crossing underneath the transmission lines. Guard structures will be accomplished using one of four means:

1) Bucket truck staged under transmission line

A bucket truck will be staged under the transmission line to guard resources.

2) Two poles on either side of the transmission line, directly buried into the ground

A two-man crew with a truck-mounted auger or hand tools, including a jack hammer and compressor, will excavate two holes on either side of the transmission line. The holes will be approximately 2-3 feet in diameter and 6-8 feet deep. Poles will be installed with a line truck and excavated soil backfilled around the poles. An additional pole will be installed across the top of the two poles to guard resources. Upon completion of the Project, the poles will be completely removed from the ground and soils contoured to pre-existing conditions. If additional backfill material is required for the pole hole after it is removed, clean decomposed granite will be used as backfill.

3) Two poles on either side of the transmission line, flower pot method

The flower pot method involves installing poles into pots, anchoring them in with concrete, and placing the pot directly on the surface where the pole is needed. This method prevents ground disturbance.

4) Protective material installed on distribution lines

A bucket truck will be utilized to install rubber insulating blankets on distribution line crossing underneath the transmission line to protect the transmission line from being energized in the event it were to touch the energized distribution line.

Information on guard structures is detailed below in Table 2.

Table	2.	Guard	Structures
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Guard Structure	Guarded Resource	Means	Bio Constraints
GS-19	Governor Drive/Village Nursery entrance	Direct buried poles	
GS-20	Governor Drive/Village Nursery entrance	Direct buried poles	
GS-21	Distribution line	Bucket truck	Pre-construction nesting bird survey (Feb 15-Aug 31). Avoid impacts to Nuttall's scrub oak (<i>Quercus dumosa</i>) located on north and east edges of GS-21
GS-22	Distribution line	Install protective material on line	(Feb 15-Aug 31).
GS-23	Railroad	Bucket truck or flower pot poles	Pre-construction nesting bird survey (Feb 15-Aug 31). Pre-construction survey for San Diego goldenstar if work occurs during blooming season of April to May. Avoid impacts to woodrat nest located within southwest portion of work area or follow applicable Reviewer Recommendation for deconstruction. Avoid ground disturbance if work occurs during the non-blooming season of June to March for San Diego goldenstar; utilize flower pots or boom truck for guard structure. Biological monitor required during installation of steel plates over creek crossing to provide vehicle access.
GS-24	Railroad	Direct buried poles	Pre-construction nesting bird survey (Feb 15-Aug 31).
GS-25	Distribution line	Install protective material on line	Pre-construction nesting bird survey (Feb 15-Aug 31). Pre-construction survey for San Diego goldenstar if work occurs during blooming season of April to May.
GS-26	Nobel Drive	Direct buried poles	Pre-construction nesting bird survey (Feb 15-Aug 31).
GS-27	Nobel Drive	Direct buried poles	Pre-construction nesting bird survey (Feb 15-Aug 31).

GS-28	Miramar Road	Bucket truck or flower pot poles	Pre-construction nesting bird survey (Feb 15-Aug 31). Pre-construction survey for San Diego goldenstar if work occurs during blooming season of April to May. Avoid ground disturbance if work occurs during the non-blooming season of June to March for San Diego goldenstar; utilize flower pots or boom truck for quard structure
GS-29	Miramar Road	Direct buried poles	Pre-construction nesting bird survey (Feb 15-Aug 31). Avoid impacts to road ruts approximately 15 feet south of GS- 28 which could support vernal pool species.
GS-30	East Gate Mall Road	Direct buried poles	
GS-31	East Gate Mall Road	Direct buried poles	
GS-32	Distribution line	Install protective material on line	Pre-construction nesting bird survey (Feb 15-Aug 31).

All guard structure locations will be accessed via existing dirt or paved access roads; with the exception of GS-23. An existing dirt access road to GS-23 is transected by Rose Creek and is not currently passable by vehicle due to severe erosion. Therefore, two 6-feet wide by 20-feet long steel plates with cribbing material will be installed to provide line truck access. The plates will be placed outside of the defined bed and bank of the creek to avoid impacts to jurisdictional resources. The steel plates will be installed with a boom truck and will remain entirely within the access road and over the creek.

Installation of guard structures is estimated to take three to five days to complete. Several crews of up to five personnel will conduct overhead work on the poles. The equipment to be used includes line trucks, bucket trucks, boom trucks, a water truck, and a pulling rig. It is estimated that it will take a total of seven to ten days to complete the overhead work at poles Z479050 through Z479055.

Trimming of vegetation may be necessary for placement of outriggers and/or direct buried poles. All trimmed vegetation will be removed from the site and properly disposed of. All SDG&E operational protocols will be implemented, and equipment and materials will be removed from the Project site upon completion of Project activities.

Habitat Evaluation

This linear project spans approximately 2.5 miles in length. The majority of the Project work areas occur on previously graded access roads and work pads which run immediately adjacent to the transmission line. SDG&E has previously mitigated for permanent impacts for creation and regular maintenance these access roads and work pads. While some of the access roads were observed to have plant growth at the time of the survey, no impacts are counted for utilization of existing access roads or work pads. However, current conditions are documented below. Additionally, habitat information for all portions of work areas occurring off of existing access roads/work pads is detailed below for each site.

Site-001 Pole Z479040

Pole Z479040 and the associated work area are on an existing access road (Photo 1). The pole is immediately surrounded by potted nursery plants and developed roads associated with Village Nursery (Photo 2).

Site-002 Pole Z479041

Pole Z479041 is within an existing graded area/work pad. A single Mexican fan palm (*Washingtonia robusta*) and potted nursery plants immediately surround the pole (Photo 3). The work area associated with this pole is located within existing dirt access roads and a graded area covered by potted nursery plants which will be temporary relocated to accommodate construction activities at this location. The pole and work area are immediately surrounded by potted nursery plants and access roads associated with Village Nursery (Photo 4).

Site-003 Pole Z479042

Pole Z479042 and the associated work area occur within an existing graded area which includes dirt access roads and a graded area covered by potted nursery plants (Photo 5). The pole is immediately surrounded by potted nursery plants and developed roads associated with Village Nursery (Photo 6). The potted nursery plants will be temporary relocated to accommodate construction activities at this location.

Site-004 Pole Z479043

Pole Z479043 is at the terminus of an existing spur road/work pad. Several species have recruited within the graded work pad, including black mustard (*Brassica nigra*), Australian saltbush (*Atriplex semibaccata*), non-native grasses, deerweed (*Acmispon glaber*), tarweed (*Deinandra fasciculata*), broom baccharis (*Baccharis sarothroides*), and San Diego goldenbush (*Isocoma menziesii*) (Photo 7). The associated work area is entirely within the existing work pad. The pole and access road are immediately surrounded by coastal sage scrub/chaparral mix habitat dominated by chamise (*Adenostoma fasciculatum*), coastal sage brush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), broom baccharis, scrub oak (*Quercus berberidifolia*), and poison oak (*Toxicondendron diversilobum*) (Photo 8).

Site-005 Pole Z479044

Pole Z479044 is at the terminus of an existing spur road/work pad (Photo 9). Non-native plant growth, including star thistle (*Centaurea melitensis*), slender oat (*Avena barbata*), and non-native grass (*bromus* sp.) has occurred since the road was last maintained. The associated work area is entirely within the existing work pad. The pole and access road are immediately surrounded in all directions by coastal sage scrub/chaparral mix habitat (Photo 10).

Site-006 Pole Z479045

Pole Z479045 is at the terminus of an existing spur road/work pad which has become partially overgrown by black mustard and non-native grasses since last maintained (Photo 11). Coastal sage scrub species, including San Diego goldenbush, deerweed, tarplant, and broom baccharis have also recruited within the work pad from the immediate surrounding areas. The associated work area consists of the existing work pad, with a portion of disturbed habitat to the west of the work pad, which is dominated by non-native grasses and black mustard (Photo 12). The pole and access road are further surrounded on all sides by a mix of coastal sage scrub habitat dominated by coastal sage brush, broom baccharis, and California buckwheat, and disturbed habitat (Photo 13).

Site-007 Pole Z479046

Pole Z479046 occurs in bare ground immediately adjacent to a dirt access road (Photo 14). The pole appears to have been previously brushed, with a couple individuals of deerweed having recruited within the brushed area. The associated work

area consists of the existing access road to the west of the pole, with a portion of disturbed habitat to the north of the pole and along the adjacent access road, which is dominated by non-native grasses (photo 15). The pole and access road are immediately surrounded on all sides by a mix of disturbed habitat and coastal sage scrub habitat.

Site-008 Pole Z479047

Pole Z479047 and the associated work area are within an existing work pad (Photos 16, 17). A portion of the work pad surrounding the pole has become overgrown with star thistle, slender oat, graceful tarplant (*Holocarpha virgata* ssp. *elongate*), and tarweed since it was last maintained. The pole and work area are further surrounded on all sides by a mix of disturbed habitat and coastal sage scrub/chaparral mix habitat.

Site-009 Pole Z479048

Pole Z479048 and an approximate 30-foot by 60-foot portion of the work area are in disturbed habitat dominated by nonnative grasses and star thistle (Photos 18, 19). The remaining portion of the access road occurs within existing dirt access roads. The pole and work area are immediately surrounded by coastal sage scrub/chaparral mix habitat and disturbed habitat (Photo 20).

Site-010 Pole Z479049

Pole Z479049 is within disturbed habitat, dominated by non-native grasses, star thistle, and tarplant (Photo 21). The associated work area consists of the existing dirt access road/work pad, and a portion of coastal sage scrub habitat to the east of the pole dominated by California sagebrush (*Artemisia californica*), deerweed, and California buckwheat (Photo 22). The pole and work area are immediately surrounded by coastal sage scrub habitat and disturbed habitat (Photo 23).

Site-011 Pole Z479050

Pole Z479050 is within disturbed habitat dominated by slender oat and *bromus* sp. (Photo 24). The associated work area consists of the existing dirt access road, with a portion of coastal sage scrub habitat to the north of the pole and access road dominated by California sagebrush, deerweed, California buckwheat, ashy spike moss (*Selaginella cinerascens*), and non-native grasses (Photo 25). The pole and access road are surrounded by a mix of coastal sage scrub/chaparral mix habitat and disturbed habitat (Photo 26). Several naturally occurring vernal pools occur east of the access road to this pole; however, this area will not be accessed for Project-related activities.

Site-012 Pole Z479051

Pole Z479051 and the associated work area are within an existing access road/work pad (Photo 27). The pole and work area are surrounded by a mix of disturbed habitat and coastal sage scrub/chaparral mix habitat (Photo 28).

Site-013 Pole Z479052

Pole Z479052 is within disturbed habitat dominated by slender oat and other non-native grass (Photo 29). The associated work area consists of the existing dirt access road to the north of the pole. The pole and access road are surrounded by a mix of disturbed habitat and coastal sage scrub/chaparral mix habitat (Photo 30).

Site-014 Pole Z479053

Pole Z479053 is on bare ground (Photo 31). The associated work area consists of the existing dirt access road/work pad adjacent to the pole. The pole and work area are surrounded by a mix of disturbed habitat, coastal sage scrub habitat, and grassland habitat consisting of soft chess (*Bromus hordeaceus*) and rattail fescue (*Festuca myuros*) (Photo 32).

Site-015 Pole Z479054

Pole Z479054 is on bare ground (Photo 33). The associated work area consists of the existing dirt access road to the north of the pole and includes an approximate 12-foot by 50-foot area of disturbed habitat beyond the road which is dominated by non-native grasses and black mustard (Photo 34). The pole and work area are surrounded by a mix of disturbed habitat, coastal sage scrub habitat, and grassland habitat (Photo 35).

Site-016 Pole Z479055

Pole Z479055 is at the terminus of an existing dirt access road/work pad. Portions of the work pad have seen non-native plant growth, including black mustard and non-native grasses, since it was last maintained (Photo 36). The associated work area consists of the existing dirt access road to the southeast of the pole and includes portions of disturbed habitat south of the pole and east of the access road which are dominated by non-native grasses and black mustard The pole and access road are surrounded by disturbed habitat, as well as coastal sage scrub habitat and grassland habitat (Photo 37).

Site-017 GS-19

GS-19 is located within bare ground and is surrounded by bare ground, pavement, and potted nursery plants (Photo 38).

Site-018 GS-20

GS-19 is located within bare ground and is surrounded by bare ground, pavement, and potted nursery plants (Photo 39).

Site-019 GS-21

GS-21 is located within an existing dirt spur road (Photo 40). Work area is needed to place two outriggers within coastal sage scrub/chaparral mix habitat dominated by poison oak (Photos 41, 42). Two Nuttall's scrub oaks are located immediately east of the south outrigger area and immediately west of the north outrigger area, on the east and north edges of GS-21. Impacts to these shrubs will be avoided during Project-related activities. GS-21 is immediately and further surrounded by coastal sage scrub/chaparral mix and disturbed habitat (Photo 43).

Site-020 GS-22

GS-22 is located partially within an existing dirt access road (Photo 44). It is immediately surrounded by riparian woodland and coastal sage scrub/chaparral mix habitat.

Site-021 GS-23

GS-23 is located within an existing dirt access road and includes work area on either side of the road for placement of two flower pot poles and four outriggers (Photos 45-47). The habitat on either side of the road consists of coastal sage scrub dominated by California buckwheat, broom baccharis, California sagebrush, San Diego goldenbush, deerweed, and tarplant. GS-23 is surrounded by coastal sage scrub and disturbed habitat. Rose Creek is located approximately 130-feet southwest of GS-23 (Photos 48, 49).

Site-022 GS-24

GS-24 is located partially within an existing dirt access road and includes areas immediately south side the road for placement of two direct bury wooden poles (Photos 50, 51). The areas for the direct buried poles consist of disturbed habitat dominated by non-native grasses and Russian thistle (*Salsola tragus*). GS-24 is surrounded by coastal sage scrub and disturbed habitat.

Site-023 GS-25

GS-25 is located partially within an existing dirt access road and includes areas on either side of the road for placement of four outriggers (Photo 52). The habitat on either side of the road consists of coastal sage scrub dominated by California buckwheat, California sagebrush, deerweed, tarplant, non-native grasses, and Russian thistle. GS-25 is surrounded by coastal sage scrub.

Site-024 GS-26

GS-26 is located within bare ground immediately south of the sidewalk on the eastbound side of Nobel Drive (Photo 53). It is surrounded to the north by pavement and to the south by coastal sage scrub and disturbed habitat.

Site-025 GS-27

GS-27 is located within disturbed habitat immediately north of the sidewalk on the westbound side of Nobel Drive. The disturbed habitat is dominated by non-native grasses, horseweed (*Erigeron Canadensis*), and doveweed (*Croton setiger*) (Photos 54, 55). It is surrounded to the south by pavement and to the north by coastal sage scrub and disturbed habitat.

Site-026 GS-28

GS-28 is located within the work area associated with pole Z479049 (Photos 56, 57).

Site-027 GS-29

GS-29 is located within an existing dirt access road (Photo 58). It is surrounded by coastal sage scrub and disturbed habitat. Road ruts which could support vernal pool species occur approximately 15 feet south of the work area for this guard structure and will be flagged for avoidance prior to construction.

Site-028 GS-30

GS-30 is located within disturbed habitat dominated by non-native grasses and black mustard (Photo 59). It is surrounded by disturbed and coastal sage scrub habitat to the south, and Eastgate Mall Road to the north.

Site-029 GS-31

GS-31 occurs along Eastgate Mall Road within disturbed habitat dominated by black mustard, horseweed, and planted brittlebush (*Encelia farinosa*) (Photos 60, 61). It is surrounded to the south by Eastgate Mall Road, and to the north by disturbed and coastal sage scrub habitat.

Site-030 GS-32

GS-32 occurs east of a dirt access road within disturbed habitat dominated by non-native grasses and black mustard (Photo 62). It is surrounded by disturbed and coastal sage scrub habitat.

General Wildlife

Wildlife species detected during survey included bushtit (*Psaltriparus minimus*), California towhee (*Melozone crissalis*), California thrasher (*Toxostoma redivivum*), mourning dove (*Zenaida macroura*), California quail (*Callipepla californica*), American kestrel (*Falco sparverius*), red-tailed hawk (*Buteo jamaicensis*), black phoebe (*Sayornis nigricans*), Northern mockingbird (*Mimus polyglottos*), house finch (*Haemorhous mexicanus*), American crow (*Corvus brachyrhynchos*), red-shouldered hawk (*Buteo lineatus*), lesser goldfinch (*Spinus psaltria*) coastal California gnatcatcher (*Polioptila californica californica;* Natural Communities Conservation Plan (NCCP)-covered species).

NCCP-Covered Species

According to the California Natural Diversity Database, the following 12 NCCP-covered plant species and 5 NCCP-covered wildlife species have been recorded within 1 mile of the Project (Table 3). During the survey, coastal California gnatcatcher (*Polioptila californica californica*) was observed adjacent to pole Z479055 and a midden potentially belonging to San Diego desert woodrat (*Neotoma lepida intermedia*) was observed within the southwest portion of the work area of GS-23. No other NCCP-covered plant or wildlife species, or burrows, dens or nests were observed during the survey of the Project sites.

Table 3. Sensitive Species Covered by the SDG&E NCCP and Documented within One Mile of the Project Sites

Common Name	Scientific Name	Federal Status	State Status	NCCP Covered Narrow Endemic
<u>Plants</u>				
Lakeside ceanothus	Ceanothus cyaneus			
Spreading navarretia	Navarretia fossalis	Threatened		
Orcutt's brodiaea	Brodiaea orcuttii			
Orcutt's spineflower	Chorizanthe orcuttiana	Endangered	Endangered	Х
Short-leaved dudleya	Dudleya blochmaniae		Endangered	Х
San Diego barrel cactus	Ferocactus viridescens			
San Diego button celery	Eryngium aristulatum var. parishii	Endangered	Endangered	
San Diego goldenstar	Bloomeria clevelandii			
Willowy monardella	Monardella viminea	Endangered	Endangered	Х
Coastal dunes milk-vetch	Astragalus tener var. titi	Endangered	Endangered	Х
San Diego mesa mint	Pogogyne abramsii	Endangered	Endangered	
Wart-stemmed ceanothus	Ceanothus verrucosus			
Wildlife				
Coastal California gnatcatcher	Polioptila californica californica	Threatened		
San Diego fairy shrimp	Branchinecta sandiegonensis	Endangered		
Orange-throated whiptail	Aspidoscelis hyperythra			
San Diego coast horned lizard	Phrynosoma blainvillii			
San Diego desert woodrat	Neotoma lepida intermedia			

Lakeside ceanothus is a shrub that occurs in chaparral habitats. Potentially suitable habitat for this species occurs in much of the surrounding area of the Project sites. However, this is a large perennial species that would have been apparent at the time of the survey, if present. This species was not observed during the survey, and no impacts to this species are anticipated from Project-related work.

Spreading navarretia prefers vernal pools and vernal swales. Suitable vernal pool habitat does not occur at any of the Project sites. While potentially suitable habitat occurs within various road ruts of dirt access roads associated with the Project sites, this species is unlikely to occur in the road due to the high amount of disturbance. Potentially suitable habitat for this species occurs east of pole Z479050; however, this area will not be accessed for Project activities. This species was not detected during the field survey, and no impacts to this species are anticipated from Project-related work.

Orcutt's brodiaea habitat includes meadows, vernal pools, and wetlands, and may occur in close coned coniferous forests, chaparral, and cismontane woodlands adjacent to moist areas. This species is a perennial bulbiferous herb that blooms between May and July. While potentially suitable habitat occurs within various road ruts of dirt access roads associated with the Project sites, this species is unlikely to occur in the road due to the high amount of disturbance. Potentially suitable habitat for this species occurs east of pole Z479050; however, this area will not be accessed for Project activities. This species was not detected during the field survey, and no impacts to this species are anticipated from Project-related work.

Orcutt's spineflower, a San Diego County endemic, is associated with weathered sandstone bluffs or loose sandy soils associated with coastal or southern maritime chaparral. This species blooms March through May and would not have been detectable during the time of the survey. The sandy/cobbly soils and coastal sage scrub/chaparral mix habitat that exist adjacent to GS-22 are considered potentially suitable for this species. However, the closest documented occurrence (in Kearny Mesa) to the Project site is based on a collection that gave a general location and is considered extirpated. Therefore, the potential for this species to occur is considered very low, and no impacts to this species are anticipated from Project-related work.

Short-leaved dudleya is a perennial succulent that blooms from April to June. Its habitat includes coastal sage scrub and chaparral habitat at elevations between 20 and 1,700 feet. Although the work areas for Z479048, Z479049, GS-21, GS-23, and GS-25 are located partially within coastal sage scrub habitat, this species is very restricted and is generally associated with unique sandstone formations. The likelihood of occurrence at any sites listed above is very low. While potentially suitable habitat for this species occurs in much the surrounding coastal sage scrub and coastal sage scrub/chaparral mix habitat associated with the Project, no individuals were observed during the survey. No impacts to this species are anticipated from Project-related work.

San Diego barrel cactus occurs in sandy or rocky areas in coastal sage scrub and valley grassland. Potentially suitable habitat for this species occurs within sites located partially within coastal sage scrub habitat, and in the immediate surrounding areas of the Project sites. However, this species is a perennial succulent that would have been apparent at the time of the survey, if present. This species was not observed during the survey, and no impacts to this species are anticipated from Project-related work.

San Diego button celery is associated with vernal pools and has an affinity to be present within white clay bottom vernal pools and large, marshy areas with white clay soils. This species blooms from May to August. While potentially suitable habitat occurs within various road ruts of dirt access roads associated with the Project sites, this species is unlikely to occur in the road due to the high amount of disturbance. Potentially suitable habitat for this species occurs east of pole Z479050; however, this area will not be accessed for Project activities. This species was not detected during the field survey, and no impacts to this species are anticipated from Project-related work.

San Diego goldenstar is a perennial herbaceous bulb which blooms from April to May. Habitat for San Diego goldenstar includes chaparral, coastal sage scrub, and valley and foothill grasslands. San Diego goldenstar is commonly found near vernal pool habitat. Potentially suitable coastal sage scrub habitat occurs within portions of the work areas for Z479048, Z479049, GS-21, GS-23, and GS-25. The surrounding coastal sage scrub, coastal sage scrub/chaparral mix, and grassland habitats of the Project sites provides moderately suitable habitat for this species. This species was not detected during the field survey. Due to the blooming period for this species and the fact that it is a bulb, it would not have been detectable at the time of the survey, if present. Impacts to this species will be avoided by avoiding ground disturbance within habitat suitable for this species if work occurs outside of the blooming season, or conducting a pre-construction survey to verify there are no plants present if work occurs during the blooming season.

Willowy monardella is a perennial herb or subshrub which occurs in coastal sage or riparian scrub in sandy bottoms and on banks of ephemeral washes in canyons where surface water flows for usually less than 48 hours after a rain event. This species blooms from June through August. The work areas at GS-22 and GS-23 are located immediately adjacent to a sandy bottomed creek and provide habitat potentially suitable for this specie. However, this species is a robust perennial which would have been detectable at the time of the survey, if present. This species was not detected during the survey, and no impacts to this species are anticipated from Project-related work.

Coastal dunes milk-vetch habitat consists of coastal dunes, bluffs, and coastal terrace grassland. This species blooms from March through June. Currently, only one known population of this species exists in Monterey County, California, and no observations of this species have been made in San Diego County since 1975. While potentially suitable habitat for this species occurs in the area surrounding the Project sites, the Project work areas do not contain habitat suitable for this species, and this species is considered extirpated from San Diego County. As a result, this species is not expected to occur at the Project sites or in the immediate surrounding areas, and no impacts to this species are anticipated from Project-related work.

San Diego mesa mint is restricted to vernal pools. Redding cobbly loams are the preferred soil type near Miramar. While potentially suitable habitat occurs within various road ruts of dirt access roads associated with the Project sites, this species is unlikely to occur in the road due to the high amount of disturbance. Potentially suitable habitat for this species occurs east of pole Z479050; however, this area will not be accessed for project activities. This species was not detected during the field survey, and no impacts to this species are anticipated from Project-related work.

Wart-stemmed ceanothus is a shrub that occurs in coastal chaparral intermixed with chamise (*Adenostoma fasciculatum*) and mission manzanita (*Xylococcus bicolor*). While potentially suitable habitat for this species occurs in the surrounding areas of much of the Project sites, suitable habitat does not occur at any of the Project sites. This is a large perennial species that would have been apparent at the time of the survey, if present. This species was not observed during the survey, and no impacts to this species are anticipated from Project-related work.

Coastal California gnatcatcher occurs in open coastal sage scrub habitat dominated by coastal sagebrush. Several of the Project sites contain coastal sage scrub habitat potentially suitable for this species, including the work areas for Z479048, Z479049, GS-21, GS-23, and GS-25. Due to many of the Project sites being partially surrounded by coastal sage scrub and/or coastal sage scrub/chaparral mix habitat, the surrounding areas of all Project sites, excluding Z479040, Z479041, Z479042, GS-19, and GS-20, provide moderate quality habitat for coastal California gnatcatcher. Coastal California gnatcatcher was observed adjacent to pole Z479055 (32.887303, -117.201360). Impacts to this species will be avoided by conducting work outside of the breeding season and/or conducting pre-construction nesting bird surveys if work is to occur during the breeding season.

Orange-throated whiptail occurs in coastal sage scrub, chaparral, edges of riparian woodlands, and washes; and in weedy, disturbed areas adjacent to these habitats. Due to many Project features occurring within or being adjacent to coastal sage scrub and/or disturbed areas adjacent to coastal sage scrub, suitable habitat for orange-throated whiptail occurs at all

Project sites; excluding Z479040, Z479041, Z479042, GS-19, GS-20, and their surrounding areas. However, this species was not observed during the survey, and no impacts to this species are anticipated with implementation of Reviewer Recommendations below

San Diego coast horned lizard is found in a wide range of habitats including chaparral, coastal sage scrub, riparian, woodland, conifer forest, and grassland. Suitable habitat within these plant communities consists of loose soils with open bare ground. Potentially suitable habitat for this species occurs at all Project sites and within adjacent access roads; with the exception of Z479040, Z479041, Z479042, GS-19, GS-20, and their surrounding areas. This species was not observed during the pre-activity survey, however there is potential for the San Diego coast horned lizard to occur throughout the majority of the Project area, and no impacts to this species are anticipated with implementation of Reviewer Recommendations below

San Diego fairy shrimp is associated with vernal pools ranging from Santa Barbara in the north, to Baja California, Mexico in the south, at elevations from sea level to approximately 2,300 feet. Suitable vernal pool habitat for this species does not occur at any of the Project sites. However, evidence of ponding was visible within low-lying and rutted portions of the dirt access roads to the Project sites. Ponded areas within the access roads are considered suitable habitat for this species. This species was not observed during the survey. Impacts to this species will be avoided as vehicles will not access wet or inundated dirt roads while working on the Project.

San Diego desert woodrat occurs in coastal southern California, south of San Luis Obispo, and northern Baja California in chaparral, sagebrush, and desert habitats. They construct large middens under cactus patches, rock outcrops, or under low trees. Several of the Project sites contain coastal sage scrub habitat potentially suitable for this species, including the work areas for Z479048, Z479049, GS-21, GS-23, and GS-25. Due to many of the Project sites being partially surrounded by coastal sage scrub and/or coastal sage scrub/chaparral mix habitat, the surrounding areas of all Project sites, excluding Z479040, Z479041, Z479042, GS-19, and GS-20, provide moderate quality habitat for San Diego desert woodrat. A midden potentially belonging to this species was observed within the southwest portion of GS-23 (32.865319,-117.188133). Impacts to this species will be avoided by following the recommendations in MMCRP MM Biology-9 below.

Reviewer Recommendations

- In order to prevent impacts to San Diego fairy shrimp, no vehicles will be permitted to drive off paved roads on MCAS Miramar for at least 72 hours after a significant rainfall event that has the potential to generate pools and create suitable road rutting conditions. No inundated pools will be driven through. No grading is to occur for this project.
- 2. In order to prevent potential impacts to San Diego goldenstar, if construction occurs during the blooming season of April to May, a survey shall be conducted by a Qualified Biologist within all work areas occurring in potentially suitable coastal sage scrub habitat (Tables 1 and 2). If observed, individuals will be flagged for avoidance and construction in the area will be monitored. At GS-23 and GS-28, if work is conducted outside of the blooming season, guard structures should be installed utilizing flower pots to avoid subsurface disturbance.
- 3. MMCRP APM Biology-2: SDG&E Subregional NCCP. The Project will avoid and minimize impacts to biological resources through implementation of the SDG&E Subregional NCCP. The SDG&E Subregional NCCP establishes a mechanism for addressing biological resource impacts incidental to the development, maintenance, and repair of SDG&E facilities within the SDG&E Subregional NCCP coverage area. The Project is located within the SDG&E Subregional NCCP coverage area. The Project is located within the SDG&E Subregional NCCP coverage area. The SDG&E Subregional NCCP coverage area. The SDG&E Subregional NCCP includes a Federal Endangered Species Act (ESA) Section 10(A) permit and a California ESA Section 2081 memorandum of understanding (for incidental take) with an Implementation Agreement with the USFWS and the CDFW, respectively, for the management and

conservation of multiple species and their associated habitats, as established according to the Federal and State ESAs and California's NCCP Act. The NCCP's Implementing Agreement confirms that the mitigation, compensation, and enhancement obligations contained in the Agreement and the SDG&E Subregional NCCP meet all relevant standards and requirements of the California ESA, the Federal ESA, the NCCP Act, and the Native Plant Protection Act with regard to SDG&E's activities in the Subregional Plan Area. Pursuant to the SDG&E Subregional NCCP, SDG&E will conduct pre-construction studies for all activities occurring off of existing access roads in natural areas. An independent biological consulting firm will survey all Project impact areas and prepared a PSR outlining all anticipated impacts related to the Project. The Project will include monitoring for all project components, as recommended by the PSR and outlined in the SDG&E Subregional NCCP, as well as other avoidance and minimization measures outlined in the NCCP's Operational Protocols. The PSR will be submitted to the CDFW and USFWS for review. Prior to the commencement of construction, a verification survey will be conducted of the Project disturbance areas, as required by the SDG&E Subregional NCCP. Biological monitors will be present during construction to assure implementation of the avoidance and minimization measures. If the previously-delineated work areas must be expanded or modified during construction, the monitors will survey the additional impact area to determine if any sensitive resources will be impacted by the proposed activities, to identify avoidance and minimization measures, and to document any additional impacts. Any additional impacts are included in a Post-Construction Report (PCR) for purposes of calculating the appropriate mitigation, which generally includes site enhancement or credit withdrawal from the SDG&E mitigation bank. When construction is complete, the biological monitor will conduct a survey of the entire line to determine actual impacts from construction. The PCR will determine how much site enhancement and credit withdrawal from the SDG&E mitigation bank will be required to address impacts from project related activities. These impact and mitigation credit calculations are submitted to the USFWS and the CDFW as part of the NCCP Annual Report pursuant to requirements of the NCCP and the NCCP Implementing Agreement. Specific operating restrictions that are incorporated into the Project design to comply with the SDG&E Subregional NCCP include the following:

- Vehicles would be kept on access roads and limited to 15 miles per hour (Section 7.1.1, 1);
- No wildlife, including rattlesnakes, may be harmed, except to protect life and limb (7.1.1, 2);
- Feeding of wildlife is not allowed (Section 7.1.1, 4);
- No pets are allowed within the ROW (Section 7.1.1, 5);
- Plant or wildlife species may not be collected for pets or any other reason (Section 7.1.1, 7);
- Littering is not allowed, and no food or waste would be left on the ROW or adjacent properties (Section 7.1.1, 8);
- Measures to prevent or minimize wild fires would be implemented, including exercising care when driving and not parking vehicles where catalytic converters can ignite dry vegetation (Section 7.1.1, 9);
- Field crews shall refer all environmental issues, including wildlife relocation, dead, or sick wildlife, or questions regarding environmental impacts to the Environmental Surveyor. Biologists or experts in wildlife handling may be necessary to assist with wildlife relocations (Section 7.1.1, 10);
- All SDG&E personnel would participate in an environmental training program conducted by SDG&E, with annual updates (Section 7.1.2, 11);

- The Environmental Surveyor shall conduct pre-activity studies for all activities occurring in natural areas, and will complete a proactivity study form including recommendations for review by a biologist and construction monitoring, if appropriate. The form will be provided to CDFW and USFWS but does not require their approval (Section 7.1.3, 13);
- The Environmental Surveyor shall flag boundaries of habitats to be avoided and, if necessary, the construction work boundaries (Section 7.1.3, 14);
- The Environmental Surveyor must approve of activity prior to working in sensitive areas where disturbance to habitat may be unavoidable (Section 7.1.4, 25);
- In the event SDG&E identifies a covered species (listed as threatened or endangered by the federal or state) of plant within the temporary work area (10-foot radius) surrounding a power pole, SDG&E would notify the USFWS (for Federal ESA listed plants) and CDFW (for California ESA listed plants) (Section 7.1.4, 28);
- The Environmental Surveyor shall conduct monitoring as recommended in the pre-activity study form (Section 7.1.4, 35);
- Supplies, equipment, or construction excavations where wildlife could hide (e.g., pipes, culverts, pole holes, trenches) shall be inspected prior to moving or working on/in them (Section 7.1.4, 37 and 38);
- Fugitive dust will be controlled by regular watering and speed limits (Section 7.1.4, 39);
- During the nesting season, the presence or absence of nesting species (including raptors) shall be determined by a biologist who would recommend appropriate avoidance and minimization measures (Section 7.1.6, 50);
- Maintenance or construction vehicle access through shallow creeks or streams is allowed. However, no filling for access purposes in waterways is allowed (Section 7.1.7, 52); and
- Staging/storage areas for equipment and materials shall be located outside of riparian areas (Section 7.1.7, 53).
- 4. *MMCRP MM Biology-1a:* General Field Personnel Behavior Requirements. All field personnel shall abide by the following general behavior requirements:
 - Vehicles must be kept on approved access roads. A 15 mile-per-hour speed limit shall be observed on dirt access roads. Vehicles shall be turned around in established or designated areas only;
 - No wildlife, including rattlesnakes, may be harmed, except to protect life and limb;
 - Firearms shall be prohibited except for those used by security personnel;
 - Feeding of wildlife shall not be allowed;
 - SDG&E personnel shall not bring pets to work areas in order to minimize harassment or killing of wildlife and to prevent the introduction of destructive domestic animal diseases to native wildlife populations;

- Parking or driving underneath oak trees shall not be allowed in order to protect root structures except in established traffic areas;
- Plant or wildlife species shall not be collected for pets or any other reason;
- Littering shall not be allowed. SDG&E shall not deposit or leave any food or waste in any work area;
- Wildfires shall be prevented or minimized by exercising care when driving and by not parking vehicles where catalytic converters can ignite dry vegetation. In times of high fire hazard, trucks shall carry water and shovels, or fire extinguishers in the field. The use of shields, protective mats, or other fire prevention methods shall be used during grinding and welding to prevent or minimize the potential for fire. Care shall be exhibited when smoking in permitted areas. Smoking is not permitted within the City of San Diego Open Space; and
- Field crews shall refer environmental issues including wildlife relocation, dead or sick wildlife, hazardous waste, or questions about avoiding environmental impact to a biologist(s) approved by the CPUC and the USFWS and CDFW. Other CPUC- and USFWS- or CDFW-biologists or experts in wildlife handling may need to be brought in for assistance with wildlife relocations.
- 5. MMCRP MM Biology-1b: Environmental Training Program. An environmental training program shall be developed and presented to all crew members prior to the beginning of all project construction. The training shall describe special-status plant and wildlife species and sensitive habitats that could occur within project work areas, protection afforded to these species and habitats, and avoidance and minimization measures required to avoid and/or minimize impacts from the project. Penalties for violations of environmental laws shall also be incorporated into the training session. Each crewmember shall be provided with an informational training handout and a decal to indicate that he/she has attended the training. The roles and responsibilities of CPUC-, USFWS-, and CDFW-approved biologist(s) and other environmental representatives shall be identified in the MMCRP and discussed during the training. All new construction personnel shall receive this training before beginning work on this project.

A copy of the training and training materials shall be provided to CPUC for review and approval at least 30 days prior to the start of construction. Training logs and sign-in sheets shall be provided to CPUC on a monthly basis. As needed, in-field training shall be provided to new on-site construction personnel by the environmental compliance supervisor or a qualified individual who shall be identified by SDG&E's Project Biologist, or initial training shall be recorded and replayed for new personnel.

- 6. MMCRP MM Biology-1c: Pre-Activity Surveys. The CPUC-, USFWS-, and CDFW-approved biologist(s) shall conduct a pre-activity survey for all activities occurring off of access roads in sensitive habitats. The pre-activity survey shall be conducted no earlier than 30 days prior to surface disturbance. The results of the pre-activity survey shall be documented by the Qualified Biologist in a PSR. The PSR shall be submitted to the CPUC for review and approval prior to the start of construction, and the results shall be submitted to CDFW and USFWS as required by any regulatory permits or approvals. The PSR shall include the following:
 - Type, location, and size of project;
 - Date, time, weather, surrounding land uses;
 - Evaluation of type and quality of habitat;
 - Work description and methods which will be used to avoid or minimize ground disturbance, including biological monitoring during construction;

- Anticipated impacts and proposed mitigation; and
- Map of location of work area.

In those situations where the Qualified Biologist cannot make a definitive species identification, the Qualified Biologist shall make a determination based on the available evidence and professional expertise. In order to ensure that habitats are not inadvertently impacted, the CPUC-, USFWS-, and CDFW-approved biologist shall flag boundaries of habitat which must be avoided. When necessary, the CPUC-, USFWS-, and CDFW-approved biologist shall also demark appropriate equipment laydown areas, vehicle turn around areas, and pads for placement of large construction equipment such as cranes, bucket trucks, augers, etc. When appropriate, the CPUC-, USFWS-, and CDFW-approved biologist shall make office and/or field presentations to field staff to review and become familiar with natural resources to be protected on a project site-specific basis. Avoidance of habitat for thread-leaved brodiaea is prioritized over minimization and mitigation. SDG&E shall maintain a library of special-status plant species locations, known to SDG&E, occurring within the project BSA. "Known" means a verified population either extant or documented using record data. Information on known sites may come from a variety of record data sources including local agency HCPs, pre-activity surveys, or biological surveys conducted for environmental compliance of the project. Plant inventories shall be consulted as part of pre-activity survey procedures.

- 7. *MMCRP MM Biology-1d:* Maintenance, Repair, and Construction of Facilities. SDG&E shall implement the following measures pertaining to maintenance, repair, and construction of facilities:
 - a. Maintenance, repair and construction activities shall be designed and implemented to minimize new disturbance, erosion on manufactured and other slopes, and off-site degradation from accelerated sedimentation, and to reduce maintenance and repair costs;
 - b. Routine maintenance of all facilities shall include visual inspections on a regular basis, conducted from vehicles driven on the project access roads where possible. If it is necessary to inspect areas which cannot be seen from the roads, the inspection shall be done on foot or from the air;
 - c. Erosion shall be minimized on access roads and other locations primarily with water bars. The water bars are mounds of soil shaped to direct flow and prevent erosion;
 - d. Hydrologic impacts shall be minimized through the use of state-of-the-art technical design and construction techniques to minimize ponding, eliminate flood hazards, and avoid erosion and siltation into any creeks, streams, rivers, or bodies of water by use of Best Management Practices;
 - e. When siting new facilities, every effort shall be made to cross wetland habitat perpendicular to the watercourse, spanning the watercourse to minimize the amount of disturbance to riparian area.
 - f. During repair or maintenance of facilities in a streambed, water may be temporarily diverted as long as the natural drainage patterns are restored after disturbance to minimize the impact of the disturbances and to help re-establish or enhance the native habitat. Erosion control during construction in a streambed in the form of intermittent check dams and culverts shall also be considered to prevent alteration to natural drainage pattern and prevent siltation;
 - g. Impact to wetlands shall be minimized by avoiding pushing soil or brush into washes or ravines;
 - h. During work on facilities, all trucks, tools, and equipment shall be kept on existing access roads or cleared areas, to the extent possible;

- i. The CPUC-, USFWS-, and CDFW-approved biologist shall approve of an activity prior to working in any natural area where disturbance to habitat may be unavoidable;
- j. Insulator washing shall be allowed from access roads if other applicable protocols in this MM are followed;
- k. Brush clearing around facilities for fire protection shall not be conducted from January 15 through August 31 (to avoid the general bird nesting season) without prior approval by the CPUC-, USFWS-, and CDFWapproved biologist. The CPUC-, USFWS-, and CDFW-approved biologist shall make sure that the habitat contains no active nests, burrows, or dens prior to clearing;
- In the event that a special-status plant species is located within the area required to be cleared for fire protection purposes, SDG&E shall notify the USFWS (for ESA-listed plants), and CDFW (for CESA-listed plants), in writing, of the plant's identity and location and of the proposed activity, which will result in a take of such plant. Notification shall occur ten working days prior to such activity, during which time USFWS or CDFW may remove such plant(s). If neither USFWS nor CDFW have removed such plant(s) with the ten working days following the notice, SDG&E may proceed to complete its fire clearing and cause a take of such plant(s) consistent with SDG&E's take coverage for the ESA- or CESA-listed plants. When fire clearing is necessary in instances other than around power poles, and the potential for impacts to special-status species exist, SDG&E shall follow the pre-activity survey and notification procedures in MM Biology-1c, above. Wire stringing shall be allowed year-round in sensitive habitats if the conductor is not allowed to drag on the ground or in brush and vehicles remain on access roads;
- Maintenance of cut and fill slopes shall consist primarily of erosion repair. In situations where revegetation would improve the success of erosion control, planting or seeding with native hydroseed mix may be done on slopes;
- n. Spoils created during maintenance operations shall be disposed of only on previously disturbed areas designated by the CPUC-, USFWS-, and CDFW-approved biologist, or used immediately to fill eroded areas. Cleared vegetation shall be hauled to a permitted disposal location;
- The CPUC-, USFWS-, and CDFW-approved biologist shall be contacted to perform a pre-activity survey when vegetation trimming is planned in sensitive habitats. Whenever possible, trees in sensitive habitats such as native riparian, woodland, or scrub vegetation shall be scheduled for trimming in non-sensitive times (i.e., outside of breeding or nesting seasons);
- p. No new facilities and activities shall be planned that would disturb vernal pools, their watersheds, or impact their natural regeneration. Continued historic maintenance of existing infrastructure utilizing existing access roads shall be allowed to continue in areas containing vernal pool habitat, provided no such habitat located within these roads would be impacted by project activities. New construction of overhead infrastructure which spans vernal pool habitats shall be allowed as long as the placement of facilities or the associated construction activities in no way impact the vernal pools;
- q. If any previously unidentified dens, burrows, nests, or special-status plants are located on any project site after the pre-activity survey, the CPUC-, USFWS-, and CDFW-approved biologist shall be contacted. The CPUC-, USFWS- and CDFW-approved biologist shall determine how to best avoid or minimize impacting the resource by considering such methods as project or work plan redevelopment, equipment placement or construction method modification, seasonal/time of day limitations, etc.;
- r. The CPUC-, USFWS-, and CDFW-approved biologist(s) shall conduct monitoring as recommended in the PSR. At completion of work, the CPUC-, USFWS-, and CDFW-approved biologist(s) shall check to verify

compliance, including observing that flagged areas have been avoided and that reclamation has been properly implemented. Also at completion of work, the CPUC-, USFWS-, and CDFW-approved biologist(s) shall be responsible for removing all habitat flagging from the construction site;

- s. The CPUC-, USFWS-, and CDFW-approved biologist(s) shall conduct checks on mowing procedures to ensure that mowing is limited to a 12-foot wide area on straight portions of the road (slightly wider on radius turns), and that the mowing height is no less than four inches;
- t. Supplies or equipment where wildlife could hide (e.g., pipes, culverts, pole holes) shall be inspected prior to moving or working on them to reduce the potential for injury to wildlife. Supplies or equipment that cannot be inspected, or from which animals cannot be removed, shall be capped or otherwise covered at the end of each work day to avoid animal entrapment. Old piping or other supplies that have been left open shall not be capped until inspected and any species found in them allowed to escape. Ramping shall be provided in open trenches when necessary. If an animal is found entrapped in supplies or equipment, such as a pipe section, the supplies or equipment shall be avoided and the animal(s) left to leave on its own accord, except as otherwise authorized by the CPUC-, USFWS- and CDFW-approved biologist. Refer to MM Biology-1a, Item 10 [referred to as Item J herein] for wildlife relocations;
- All steep-walled trenches or excavations used during construction shall be inspected twice daily (early morning and evening) to protect against wildlife entrapment. If wildlife is located in the trench or excavation, the CPUC-, USFWS-, and CDFW-approved biologist(s) shall be called immediately to remove it if it cannot escape unimpeded;
- Large amounts of fugitive dust could interfere with photosynthesis. Fugitive dust created during clearing, grading, earth-moving, excavation or other construction activities shall be controlled by regular watering. At all times, fugitive dust emissions will be controlled by limiting on-site vehicle speed to 15 miles per hour; and
- w. Before using pesticides in areas where burrowing owls may be found, a pre-activity survey shall be conducted.
- 8. *MMCRP MM Biology-1g:* Survey Work Protocols. SDG&E shall implement the follow measures during survey work:
 - a. Brush clearing for foot path or line-of-sight cutting shall not be allowed from February through September without prior approval from the CPUC-, USFWS-, and CDFW-approved biologist, who will ensure the brush clearing activity, does not adversely affect a special-status species or nesting birds;
 - b. SDG&E survey personnel shall keep vehicles on existing access roads. No clearing of brush shall be allowed from February through September without prior approval from the CPUC-, USFWS-, and CDFWapproved biologist, who will ensure the brush clearing activity, does not adversely affect a special-status species or nesting birds; and
 - c. Hiking off roads or paths for survey data collection shall be allowed year-round as long as other protocols are met.
- 9. **MMCRP MM Biology-3:** Weed Control Plan. SDG&E shall prepare and implement a comprehensive, adaptive Weed Control Plan for pre-construction and long-term invasive, non-native species abatement. Developed land shall be excluded from weed control. Where SDG&E owns the property, the Weed Control Plan shall include specific weed abatement methods, practices, and treatment timing developed specifically for the Project area by

qualified individuals with at least 5 years of weed control experience within San Diego County. The Weed Control Plan shall address control methods and issues controlling invasive non-native species within all vegetation communities and land cover types found along the Project alignment. On ROW easement on MCAS Miramar, the Weed Control Plan shall incorporate all appropriate and legal U.S. Marine Corps-stipulated regulations. The Weed Control Plan shall be submitted to MCAS Miramar for final authorization of weed control methods, practices, and timing prior to implementation of weed control on MCAS Miramar. The Weed Control Plan shall be submitted to the City of San Diego for final authorization of weed control methods, practices, and timing prior to implementation of weed control methods. The Weed Control Plan shall be submitted to the City of San Diego for final authorization of weed control methods, practices, and timing prior to implementation of some control methods. The Weed Control Plan shall be submitted to the City of San Diego for final authorization. The Weed Control Plan shall be submitted to the City of San Diego MHPA. The Weed Control Plan shall include the following:

- A pre-construction weed inventory shall be conducted by surveying the entire ROW and areas immediately
 adjacent to the ROW where access permission is obtained, as well as at all ancillary facilities associated
 with the Project for weed populations that: (1) are considered by the San Diego County Agriculture
 Commissioner, MCAS Miramar (for ROW on MCAS Miramar), or City of San Diego (for ROW within the
 City of San Diego MHPA) as being a priority for control, (2) are weed populations that are rated High or
 Moderate for negative ecological impact in the California Invasive Plant Inventory (online) Database (CalIPC 2006 [and 2007 update]; http://www.cal-ipc.org/ip/ inventory/ index.php) or are weed species of
 concern to MCAS Miramar (for ROW on MCAS Miramar), and (3) aid and promote the spread of wildfires in
 San Diego County.
- Prolific wildfire-promoting species such as brome grasses (Bromus sp.) shall be mapped but not targeted for control outside of Project impact areas. These populations shall be mapped and described according to density and area covered. These plant species shall be treated prior to construction or at a time when treatments would be most effective based on phenology according to control methods and practices for invasive weed populations included in the Weed Control Plan or required by MCAS Miramar or City of San Diego.
- Weed control treatments shall include all legally permitted methods to be used in the following prioritized order: preventative, manual, mechanical, and chemical.
- All treatments shall be applied with the authorization of the, MCAS Miramar and City of San Diego as appropriate.
- The application of herbicides shall be in compliance with all state and federal laws and regulations under the prescription of a Pest Control Advisor (PCA) and implemented by a Licensed Qualified Applicator.
- Where manual and/or mechanical methods are used, disposal of the plant debris will be within an approved landfill area within San Diego County.
- The timing of the weed control treatment shall be determined for each plant species in consultation with the
 PCA for the Project, and with MCAS Miramar, and City of San Diego as appropriate, with the goal of
 controlling populations before they start producing seeds. For the lifespan of the project (i.e., as long as
 the project is physically present), long-term measures to control the introduction and spread of weeds in the
 project area shall be taken as follows:
 - From the time construction begins until 2 years after construction is complete, annual surveying for new invasive weed populations and the monitoring of identified and treated populations shall be required in the survey areas described above. After this time, surveying for new invasive weed populations and monitoring of identified and treated populations shall be required at an interval of every two years.

- However, the treatment of weeds shall occur on a minimum annual basis, unless otherwise approved by the PCA, MCAS Miramar, and City of San Diego as appropriate.
 - During project construction and operation/maintenance, all seeds and straw materials shall be certified weed free, and all gravel and fill material shall also be certified weed free.
 - o During project construction, vehicle and boot wash stations shall be provided.
- 10. MMCRP MM Biology-6: Compensatory Mitigation for Impacts to Habitat. SDG&E shall restore temporarily impacted areas to pre-construction conditions following construction according to the performance criteria described below and/or shall purchase/dedicate suitable habitat for preservation to off-set permanently impacted areas. Restoration of some vegetation communities in temporarily impacted areas may not be possible if those areas are subject to vegetation management to maintain proper clearance between transmission lines and vegetation, for example. In those instances, the mitigation shall consist of off-site acquisition and preservation of the vegetation community. Restoration of temporarily impacted areas involves recontouring the land, replacing the topsoil (if it was collected), planting seed and/or container stock, maintaining (i.e., weeding, replacement planting, supplemental watering, etc.), and monitoring the restored area for a period of 5 years and or until year 5 success criteria are met. SDG&E shall prepare a Habitat Restoration Plan that shall be subject to approval by the CPUC, USFWS, CDFW, City of San Diego (for restoration within City of San Diego MHPA), and MCAS Miramar (for restoration on MCAS Miramar) prior to habitat impacts. Required mitigation ratios are provided by habitat type in Table 4.1-10. In cases where the impacts to sensitive vegetation communities occur in the City of San Diego MHPA, the mitigation shall also occur in the MHPA. The Habitat Restoration Plan shall also identify, if applicable, the potential for reintroduction and/or increasing MSCP-covered species populations within habitat restoration areas if those covered species were affected by the Project.

Vegetation Community	Mitigation Ratio				
	Temporary	Permanent ¹			
Diegan Coastal Sage Scrub					
Diegan coastal sage scrub	1:1	1:1			
Diegan coastal sage scrub in the MHPA	1:1	2:1			
Diegan coastal sage scrub-Disturbed	1:1	1:1			
Diegan coastal sage scrub-Disturbed in the MHPA	1:1	2:1			
Diegan coastal sage scrub-Revegetated	1:1	1:1			
Diegan coastal sage scrub-Revegetated in the MHPA		2:1			
Coastal Sage Scrub					
Coastal sage-chaparral scrub	0.5:1	1:1			
Coastal sage-chaparral scrub in the MHPA	1:1	2:1			
Chaparral					
Chamise chaparral	0.5:1	1:1			
Chamise chaparral in the MHPA	1:1	2:1			
Chamise chaparral-disturbed	0.5:1	1:1			
Chamise chaparral-disturbed in the MHPA	1:1	2:1			
Scrub oak chaparral	1:1	1:1			

Table 4: Required Habitat Mitigation Ratios
Scrub oak chaparral in the MHPA	2:1	2:1	
Southern mixed chaparral	0.5:1	1:1	
Southern mixed chaparral in the MHPA	1:1	2:1	
Southern mixed chaparral-disturbed	0.5:1	1:1	
Southern mixed chaparral-disturbed in the MHPA	1:1	2:1	
Grassland			
Native grassland	1:1	1:1	
Native grassland in the MHPA	2:1	2:1	
Non-native grassland	0.5:1	1:1	
Non-native grassland in the MHPA		2:1	
Freshwater Marsh			
Freshwater marsh		1:1	
Vernal Pool			
San Diego Mesa Vernal Pool	3:1	3:1	
Riparian			
Southern riparian scrub		1:1	
Mule fat scrub		1:1	
Mulefat scrub in MHPA		2:1	
Southern willow scrub		1:1	
Southern willow scrub in MHPA		2:1	
Tamarisk scrub in MHPA		2:1	
Southern coast live oak riparian forest		1:1	
Southern coast live oak riparian forest in MHPA		2:1	

Notes

¹ Mitigation ratios for permanent impacts are consistent with SDG&E's NCCP; 1:1 for permanent impacts outside a preserve and 2:1 for permanent impacts inside a preserve.

The Restoration Plan shall include the following performance criteria:

- a. Percent cover and composition shall be similar to the conditions of a nearby reference site, defined as variation of no more than 10 percent absolute cover from the reference site cover and species composition condition;
- b. Maintenance and monitoring for restoration shall be for 5 years or until success criteria are met. Compensation planting areas shall be monitored eight times in Year 1, six times per year in Years 2 and 3, and 4 times per year in Years 4 and above;
- c. Compensation planting areas shall be monitored for invasive plants in the first 5 years following replanting. Invasive plant monitoring shall occur eight times in Year 1, six times per year in Years 2 and 3, and 4 times per year in Years 4 and 5. If invasive plants are found during the 5-year monitoring period, they shall be removed as necessary to support meeting the cover and vegetation composition success criteria;

- d. If the restoration fails to meet the established success criteria after the maintenance and monitoring period, maintenance and monitoring shall extend beyond the 5-year period until the criteria are met or unless otherwise approved by the CPUC; and
- e. Maintenance and monitoring shall be conducted following a prescribed schedule to assess progress and identify potential problems with the restoration. Remedial action (e.g., additional planting, weeding, erosion control, use of container stock, supplemental watering, etc.) shall be taken by an experienced, licensed Habitat Restoration Contractor during the maintenance and monitoring period if necessary to ensure the success of the restoration.

Any impacts associated with unauthorized activity (e.g., exceeding approved construction footprints or implementing the Habitat Management Plan after the allowed timeframe of 18 months following the initiation of any vegetation disturbing activities) shall be mitigated at a 5:1 ratio. Restoration of the unauthorized impacts shall be credited at a 1:1 ratio (i.e., mitigated by in-place habitat restoration); the remaining 4:1 shall be acquired and preserved off-site.

For areas where habitat restoration cannot meet mitigation requirements, as determined by the Habitat Restoration Specialist in coordination with CPUC, USFWS, CDFW, and MCAS Miramar (for restoration on MCAS Miramar), offsite purchase and dedication of habitat (or as otherwise prescribed by MCAS Miramar for restoration on MCAS Miramar) shall be provided at the mitigation ratios provided in Table 4.

Mitigation Parcels/Habitat Management Plans. All off-site mitigation parcels shall be approved by the CPUC, USFWS, CDFW and MCAS Miramar (as applicable) and must be acquired, or their acquisition must be assured. To demonstrate that such parcels will be acquired, SDG&E shall submit a Habitat Acquisition Plan at least 120 days prior to any ground disturbing activities for CPUC, USFWS, CDFW, and MCAS Miramar (as applicable) review and approval. The Habitat Acquisition Plan shall include, but shall not be limited to:

- a. Legal descriptions and maps of all parcels to be acquired;
- b. Schedule that includes phasing relative to impacts;
- c. Documentation demonstrating that the mitigation parcel(s) provides high quality habitat roughly equivalent in composition to the habitats that would be impacted by the project and at appropriate acreages;
- d. Timing of conservation easement recording;
- e. Initiation of habitat management activities relative to acquisition; and
- f. Assurance mechanisms (e.g., performance bonds to assure adequate funding) for any parcels not actually acquired prior to vegetation disturbing activities.

A Habitat Management Plan shall be prepared by a biologist and approved by the CPUC, USFWS, CDFW, and MCAS Miramar (as applicable) for all acquired off-site mitigation parcels. The Habitat Management Plan must be approved in writing by these agencies (as applicable) within 18 months of the initiation of any vegetation disturbing activities. The Habitat Management Plan shall provide direction for the preservation and in-perpetuity management of all acquired, off-site mitigation parcels. The Habitat Management Plan shall provide direction for the preservation and in-perpetuity management of all acquired, off-site mitigation parcels. The Habitat Management Plan shall not be limited to:

- a. Adequate SDG&E funding for the preparation and implementation of the HMP;
- b. Legal descriptions of all mitigation parcels approved by the CPUC, USFWS, CDFW, and MCAS Miramar (for mitigation parcels to be acquired for MCAS Miramar impacts);

- c. Baseline biological data for all mitigation parcels;
- d. Designation of a land management entity approved by the CPUC, USFWS, CDFW, and MCAS Miramar (for mitigation parcels to be acquired for MCAS Miramar impacts) to provide in-perpetuity management;
- e. A Property Analysis Record prepared by the designated land management entity that explains the amount of funding required to implement the Habitat Management Plan;
- f. Designation of responsible parties and their roles (e.g., provision of endowment by SDG&E to fund the Habitat Management Plan and implementation of the Habitat Management Plan by the designated land management entity); and
- g. Management specifications including, but not limited to, regular biological surveys to compare with the baseline data; invasive, non-native species control; fence/sign replacement or repair; public education; trash removal; and annual reports to CPUC, USFWS, CDFW, and MCAS Miramar (for mitigation parcels to be acquired for MCAS Miramar impacts).
- 11. **MMCRP MM Biology-7:** Mitigation for Bird Species. This measure applies to all work areas in which any construction-related activities must be conducted during the nesting bird season (generally between January 15 and August 31, but may be earlier or later depending on species, location, and weather conditions).

Nesting Bird Survey Requirements: If work is scheduled to occur during the avian nesting season, nesting bird surveys shall be conducted according to the following provisions:

- a. Nest surveys shall occur within 5 days prior to the start of ground-disturbing construction or vegetation trimming or removal activities. If there is no work in an area for 7 days, it shall be considered a new work area if construction, vegetation trimming, or vegetation removal begins again;
- b. Surveys shall be conducted with sufficient survey duration and intensity of effort necessary for the identification of active nests, which is defined as once birds begin constructing, preparing, or using a nest for egg-laying. A nest is no longer an "active nest" if abandoned by the adult birds or once fledglings are no longer dependent on the nest". Surveys shall include nests of protected species within vegetation identified for removal and/or pruning, and within the following buffers of active work areas: 0.25-mile buffer for white-tailed kite; 500-foot buffer for other raptor species;
- c. Surveys shall be conducted during locally appropriate dates for nesting seasons determined in consultation with the USFWS and CDFW; note that generally the season is between January 15 and August 31 but may be earlier or later depending on species, location, and weather conditions. Species-specific nesting seasons for some species are identified below;
- d. The surveys shall be conducted by a CPUC, USFWS-, and CDFW-approved qualified biologist;
- e. Survey results shall be provided to CPUC, USFWS, and CDFW prior to initiating construction activities; and
- f. Work areas within which significant noise is not generated, such as work performed manually, by hand or on foot, and/or that would not cause significant disturbances to nesting birds (e.g., operating switches, driving on access roads, normally occurring activities at substations, and activities at staging and laydown

areas) do not need to be surveyed prior to use. None of these activities shall result in physical contact with a nest.

Avoid Impacts on Nesting Birds. During the nesting season (generally between January 15 and August 31) raptor nests that are located within a 500-foot buffer from a work location shall be evaluated by a CPUC-, USFWS-, and CDFW-approved qualified biologist to determine whether the raptor nest is active. No trees with active raptor nests shall be removed during nesting season.

No additional measures shall be implemented if active nests are more than the following distances from the nearest work areas: (a) 0.25 mile for white-tailed kite, (b) 500 feet for raptors, Coastal California gnatcatcher, and least bell's vireo, (c) 250 feet for passerine birds in open space areas, or (d) 150 feet for common (non-special status) passerine birds in residential, commercial, and industrial areas. Buffers shall not apply to construction-related traffic using existing roads where the use of such roads is not limited to project-specific use (i.e., county roads, highways, farm roads, or other private roads). Where road use is limited to project-specific use, a buffer reduction or approval to drive through a buffer shall be obtained as described below under "Buffer Reduction".

As appropriate, exclusion techniques may be used for any construction equipment that is left unattended for more than 24 hours to reduce the possibility of birds nesting in the construction equipment. An example of an exclusion technique is covering equipment with tarps.

Buffer Reduction. The specified buffers from nesting birds may be reduced on a case-by-case basis if, based on compelling biological or ecological reasoning (e.g., the biology of the bird species, concealment of the nest site by topography, land use type, vegetation, level of project activity, and level of pre-existing disturbance on site), it is determined by a CPUC-, USFWS-, and CDFW-approved qualified biologist that implementation of a specified smaller buffer distance will still avoid nest abandonment and failure. This requirement includes buffer reductions or temporary buffer incursions for project-related use of roads where no stopping, standing, or other work activities shall occur in the buffer. Requests to reduce standard buffers or for temporary buffer incursions must be submitted to CPUC's independent biologist for review. Requests to reduce buffers must include:

- a. Species;
- b. Location;
- c. Pre-existing conditions present on site;
- d. Description of the work to be conducted within the reduced buffer;
- e. Size and expected duration of proposed buffer reduction;
- f. Reason for the buffer reduction;
- g. Name and contact information of the CPUC-, USFWS-, and CDFW-approved qualified biologist(s) who requested the buffer reduction and will conduct subsequent monitoring; and
- h. Proposed frequency and methods of monitoring necessary for the nest given the type of bird and surrounding conditions.

CPUC's independent biologist shall respond to SDG&E's request for a buffer reduction (and buffer reduction terms) within 1 business day; if a response is not received, SDG&E may proceed with the buffer reduction until CPUC's independent biologist can review and approve or deny the buffer reduction request. If SDG&E

proceeds with a reduced buffer, nests shall be monitored on a daily basis during construction activities. If the buffer reduction request is denied, or if the qualified biologist determines that the nesting bird(s) are not tolerant of project activity, the specified buffer(s) listed above in this measure shall be implemented.

Non-special status species found building nests within the work areas after specific project activities begin may be tolerant of that specific project activity; however, the CPUC-, USFWS-, and CDFW-approved qualified biologist shall implement an appropriate buffer or other appropriate measures to protect the nest after taking into consideration the position of the nest, the bird species nesting on site, the type of work to be conducted, and duration of the construction disturbance. In these cases, the proposed buffer or other measures must be approved by CPUC's independent biologist through the buffer reduction process outlined in this measure, if buffers are less than those specified in this measure. These nests shall be monitored on a daily basis and only during construction activities (no monitoring required during periods when no work is conducted) by a qualified biologist until the qualified biologist has determined that the young have fledged or construction ends within the work area (whichever occurs first). If the gualified biologist determines that the nesting bird(s) are not tolerant of project activity. the buffer outlined above in this measure shall be implemented.

Specific Requirements for Coastal California Gnatcatcher and Least Bell's Vireo. Where there is potential nesting habitat for the coastal California gnatcatcher or least Bell's vireo within or adjacent to the MHPA, construction or operation/maintenance noise that exceeds the existing baseline noise level for a site by more than 3 dB hourly average or an hourly average threshold of 60 decibels, whichever is higher, shall be avoided during these species' breeding seasons as follows: coastal California Gnatcatcher March 1 through August 15, and least Bell's vireo March 15 through September 15. If avoidance is not possible during the breeding season, SDG&E shall work with a qualified acoustician approved by the CPUC, USFWS, and CDFW to develop and implement noise attenuation measures. The following measures shall be adhered to when project activities during the breeding season occur within riparian habitats that may support vireo and flycatcher:

• A biologist knowledgeable of vireo and/or flycatcher biology and ecology, approved by the CPUC, USFWS, and CDFW, will survey within the project impact footprint and a 300-foot buffer (within riparian scrub) before clearing vegetation or project construction to check for vireo and/or flycatcher nesting activity. Should an active nest be located in the impact footprint, then work will be suspended until the nest is vacated.

• Biological buffers of at least 100 feet will be maintained adjacent to active nests.

For project activities during the breeding season adjacent to known occupied vireo and/or flycatcher nesting habitat, the biologist will monitor nesting bird activity. If the biologist determines that nesting birds are being disrupted by project activities, then work will be suspended until effective minimization measures (e.g., noise attenuation structures) developed in coordination with the CPUC, USFWS, and CDFW are in place or until after the breeding season is completed.

Any lighting required during project activities will be shielded and directed away from vireo and/or flycatcher habitat to ensure that these areas are not artificially illuminated.

Avian Protection on Power Lines. The project shall include collision-reducing techniques for transmission lines (based on Reducing Avian Collisions with Power Lines: The State of the Art in 2012; Avian Power Line Interaction Committee [APLIC] 2012).

Monitoring and Reporting. All nests with a reduced buffer shall be monitored on a daily basis during construction activities by a CPUC-, USFWS-, and CDFW-approved qualified biologist until the qualified biologist has determined that the young have fledged or until one week after construction ends within the reduced buffer/work area (whichever occurs first).

Nest locations and exclusion buffers shall be mapped (using geographic information systems [GIS]) for all nests identified. This information shall be maintained in a database and shall be provided to CPUC, CDFW, and

USFWS. A monthly written report shall be submitted to CPUC, CDFW, and USFWS for construction within a reduced buffer and shall include the following: information included in buffer reduction requests, work conducted within the work site, duration of work activities and related buffer reduction, information on nest success (eggs, young, and adults). No avian reporting shall be required for construction occurring outside of the nesting season and if construction activities do not occur within a reduced buffer during any calendar month. A final report shall be submitted to CPUC, CDFW, and USFWS at the end of each nesting season summarizing all avian-related monitoring results and outcomes for the duration of project construction. Nests located in areas of existing human presence and disturbance, such as in yards of private residences, or within commercial and or industrial properties, are likely acclimated to disturbance and do not need to be monitored, as determined by the CPUC-, USFWS-, and CDFW-approved qualified biologist and approved by CPUC's independent biologist.

12. MMCRP MM Biology-8: Burrowing Owl Monitoring and Mitigation Plan. SDG&E shall prepare a Burrowing Owl Monitoring and Mitigation Plan (BOMMP) consistent with the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012). SDG&E shall submit the Draft BOMMP to CDFW and CPUC. SDG&E shall be required to obtain approval from CDFW on the BOMMP prior to construction. SDG&E shall provide the approved BOMMP to the CPUC 30 days prior to construction.

In accordance with the Staff Report on Burrowing Owl Mitigation (CDFW 2012) and CDFW-approved BOMMP, SDG&E shall conduct a preconstruction take avoidance survey for the burrowing owl prior to initiating ground disturbance activities. In areas where owl presence is not found, construction may proceed without further mitigation. If western burrowing owl occupancy on site is confirmed during preconstruction take avoidance surveys, SDG&E shall implement the CDFW-approved Burrowing Owl Monitoring and Mitigation Plan in coordination with CDFW.

13. MMCRP MM Biology-9: San Diego Desert Woodrat Mitigation. A CPUC-approved qualified biologist shall conduct a preconstruction survey to identify potential San Diego desert woodrat houses within the project work areas and within 5 feet of the edge of the work areas to avoid direct take of woodrats. All woodrat houses shall be documented and reported through the MMCRP. Woodrat houses found within the work site or within 5 feet from a work site shall be flagged or fenced for avoidance. If impacts to a woodrat house located within a work site are unavoidable, a CPUC-approved qualified biologist, prior to construction and outside of the breeding season (April through June), shall dismantle the house by hand, removing the materials layer by layer to allow for adult woodrats to escape. If young are present and found during the disassembling process, the CPUC-approved qualified biologist shall leave the site for at least 24 hours to allow for the rats to relocate their young on their own. This step shall be repeated as needed until the young have been relocated by the parent woodrats. Once the nest is vacant, the disassembly process shall be completed and the nest sticks shall be collected and moved to another suitable nearby location to allow for nest reconstruction. Piles of cut vegetation/slash shall be retained near the work site prior to nest dismantling to provide refuge for woodrats that may become displaced.

Summary of Impacts

No permanent impacts will result from this Project. Only overhead work is proposed for poles. Overhead work is assumed to have a temporary impact area around the base of each pole of 34 square feet, which is caused by pedestrian access around the base of the pole. Additional workspace associated with each pole is designated as necessary. Temporary impacts resulting from guard structures vary in size and are caused by staging of bucket trucks, placement of outriggers, and placement of temporary direct buried poles.

The total work area estimated for the proposed construction activities described in this PSR is 3.12 acres, as summarized in the table below. The majority of the work area (127,682 square feet) to be utilized occurs within existing developed access

roads and work pads. No impacts associated with utilization of existing paved access roads, dirt access roads, and work pads (including pedestrian access around the bases of poles located within work pads) are included in this PSR.

Land Cover Type	Acres	Temporary Impacts (Square Feet)
Developed (Existing Access Roads and Pads)	2.93	127,682
Disturbed/Bareground (Outside of Existing Access Roads and Pads)	0.15	6,490
Sensitive Habitat (CSS & CSS/Chaparral Mix)	0.04	1,735
Total including habitat	3.12	135,907

A total of 8,225 square feet of temporary impacts are anticipated to occur as a result of the Project. Temporary impacts include 6,490 square feet of impact to bare ground and disturbed area, and 1,735 square feet to sensitive habitat (1,719 square feet to coastal sage scrub and 16 square feet to coastal sage scrub/chaparral mix habitat). A breakdown of impacts can be referenced in the accompanying PSR Data Form.

Following implementation of SDG&E's Operational Protocols and the Reviewer Recommendations above, no impacts to potentially-present NCCP-covered wildlife species are expected to occur as a result of this Project.

Mitigation

According to maps provided by SDG&E, poles Z479053, Z479054, Z479055, GS-31, and GS-32 are located outside of an SDG&E-defined Preserve area. Per Table 7.4 of the NCCP, temporary impacts outside the designated Preserve do not require mitigation. Furthermore, no impacts to sensitive habitat types are anticipated at these work sites. Therefore, SDG&E does not propose mitigation for temporary impacts occurring at poles Z479053, Z479054, Z479055, GS-31, or GS-32.

The remaining poles are located on MCAS Miramar property, where no Preserve boundaries have been established. As stated in SDG&E's NCCP, when no Preserve is formally delineated, habitats of moderate, high, or very high quality are to be considered as Preserve. Habitat quality is based on plant species composition and connectivity with surrounding natural vegetation communities. The Project sites are surrounded by a large contiguous area of open space dominated by moderate quality grassland, coastal sage scrub, and chaparral habitats capable of supporting NCCP-species. Therefore, these Project sites will be considered as Preserve quality for mitigation purposes.

Impacts to sensitive habitat types will be mitigated according to specifications outlined in Table 7.4 of the SDG&E NCCP and the project's FEIR, which in some cases may require mitigation above and beyond what is required by SDG&E's NCCP. Temporary impacts to sensitive habitat types will be mitigated through a project-specific Habitat Restoration Plan based on the requirements found in the SDG&E Enhancement and Monitoring Program described in Section 7.2 of the NCCP and the project's FEIR. While Table 7.4 of the SDG&E NCCP would not require mitigation for sites within a Preserve experiencing less than 500 square feet of temporary impacts to sensitive habitats, the project's FEIR does require mitigation for these impacts. Accordingly, SDG&E will mitigate for all 1,735 square feet of temporary impacts to sensitive habitat Restoration Plan.

APPENDIX B

Biological Resources

Vegetation Maps

Vernal Pools and Wetlands Maps

Non-NCCP Special Status Plant Species Table

Biological Pre-Activity Survey Report

Photographs



Photo 1. North-facing view of Z479040.



Photo 2. East-facing view of dirt access road from Village Nursery to Z479040.



Photo 3. North-facing view of Z479041.



Photo 4. East-facing view of dirt access road from Village Nursery to Z479041.



Photo 5. West-facing view of Z479042.



Photo 6. South-facing view of dirt access road from Village Nursery to Z479042.



Photo 7. Northeast-facing view of Z479043.



Photo 8. Southwest-facing view of spur road to Z479043 off dirt access road from Village Nursery.



Photo 9. North-facing view of Z479044.



Photo 10. South-facing view of spur road to Z479044 off of dirt access road from Village Nursery.



Photo 11. Northwest-facing view of Z479045.



Photo 12. Northwest-facing view of work area at Z479045.



Photo 13. South-facing view of spur road to Z479045 off dirt access road off of Nobel Drive.



Photo 14. East-facing view of Z479046.



Photo 15. North-facing view of dirt access road off Nobel Drive to Z479046 and portion of work area.



Photo 16. Southwest-facing view of Z479047.



Photo 17. West-facing view of work area associated with Z479047.



Photo 18. Southwest-facing view of Z479048.



Photo 19. North-facing view of work area associated with Z479048.



Photo 20. South-facing view of dirt access road off of Nobel Drive to Z479048.



Photo 21. North-facing view of Z479049.



Photo 22. North-facing view of work area associated with Z479049.



Photo 23. North-facing view of dirt access road off of Miramar Road to Z479049.



Photo 24. Southwest-facing view of Z479050.



Photo 25. East-facing view portion of work area at Z479050.



Photo 26. South-facing view of dirt access road off of Miramar Road to Z479050.



Photo 27. West-facing view of Z479051.



Photo 28. Southeast-facing view of dirt access road off of Miramar Road to Z479051.



Photo 29. Northwest-facing view of Z479052.



Photo 30. North-facing view of dirt access road off of Eastgate Mall Road leading to Z479052.



Photo 31. West-facing view of Z479053.



Photo 32. South-facing view of dirt access road off of Eastgate Mall Road leading to Z479053.



Photo 33. Northeast-facing view of Z479054.



Photo 34. Northeast-facing view of portion of work area at Z479054.



Photo 35. Southwest-facing view of dirt access road off of Eastgate Mall Road to Z479054.



Photo 36. Northwest-facing view of Z479055.



Photo 37. South-facing view of dirt access road off of Eastgate Mall Road to Z479055 and a portion of the work area at Z479055.



Photo 38. South-facing view of GS-19 (yellow arrows indicate pole locations).



Photo 39. Northwest-facing view of GS-20 (yellow arrows indicate pole locations).



Photo 40. East-facing view of GS-21.



Photo 41. East-facing view of north outrigger area for GS-21.



Photo 42. South-facing view of south outrigger area for GS-21.



Photo 43. East-facing view of pedestrian access to distribution pole associated with GS-21.



Photo 44. Aerial view of GS-22.



Photo 45. East-facing view of GS-23.



Photo 46. North-facing view of west pole location for GS-23.



Photo 47. North-facing view of east pole location for GS-23.



Photo 48. West-facing view of west pole location for GS-24.



Photo 49. West-facing view of east pole location for GS-24.



Photo 50. Aerial view of GS-25.



Photo 51. East-facing view of GS-26 (yellow arrows indicate pole locations).



Photo 52. North-facing view of northwest pole location for GS-27.



Photo 53. Northeast-facing view of southeast pole location for GS-27.



Photo 54. North-facing view of west pole location for GS-28.



Photo 55. North-facing view of east pole location for GS-28.



Photo 56. Northwest-facing view of GS-29 (yellow arrows indicate pole locations).
PHOTO DOCUMENT Sycamore-Peñasquitos 230-kV Transmission Line Project Del Mar and Miramar, San Diego County, CA AECOM Site Survey, August 15 & 25, 2017



Photo 57. Aerial-view of GS-30.



Photo 58. East-facing view of west pole location for GS-31.

PHOTO DOCUMENT Sycamore-Peñasquitos 230-kV Transmission Line Project Del Mar and Miramar, San Diego County, CA AECOM Site Survey, August 15 & 25, 2017



Photo 59. West-facing view of east pole location for GS-31.



Photo 60. East-facing view of GS-32.