

From: [Fritts Golden](#)
To: [Collins, Linda](#)
Cc: "billie.blanchard@cpuc.ca.gov" (billie.blanchard@cpuc.ca.gov); [Pearson, Scott](#); MDoalson@semprautilities.com; JSeifert@semprautilities.com; [Hingtgen, Robert J](#); [Jim Whalen \(james@jwhalen.net\)](mailto:Jim.Whalen@jwhalen.net); [John Gibson \(john@hamannco.com\)](#); [Sher, Nicholas \(nicholas.sher@cpuc.ca.gov\)](mailto:Sher.Nicholas@cpuc.ca.gov); [Merideth "Molly" Sterkel \(merideth.sterkel@cpuc.ca.gov\)](#); [Borak, Mary Jo \(maryjo.borak@cpuc.ca.gov\)](mailto:MaryJo.Borak@cpuc.ca.gov); [Fritts Golden](#); [Vida Strong](#); [Valerie Yep](#); [Shelby Howard](#)
Subject: Mitigation Restoration in lieu of using Rough Acres site
Date: Tuesday, June 18, 2013 3:46:07 PM
Attachments: [Rough Acres Restoration Ltr 061813.pdf](#)

Linda:

Billie Blanchard, CPUC, has requested that I send you her reply regarding the Rough Acres property and SDG&E's restoration obligations for impacts there. The letter approving your plan for using alternative locations is attached. If you have any questions, please contact Billie.

Regards

Fritts



Fritts Golden, MRP

Senior Associate

www.aspeneg.com

235 Montgomery Street, Suite 935

San Francisco, CA 94104

Direct: (415) 696-5313 Cell: (415) 867-7030

fgolden@aspeneg.com

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PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 18, 2013

Ms. Linda Collins
Manager – Sunrise Environmental
SDG&E Environmental Services
8315 Century Park Court - CP21E
San Diego, CA 92123-1548

RE: Approval of Alternative Program to Mitigate for Impacts at Rough Acres Yard.

Dear Ms. Collins:

CPUC staff has reviewed your letter of May 24, 2013, replying to our request for information regarding how SDG&E will meet its obligations to mitigate for impacts that occurred from activities at Rough Acres Yard. A copy of your letter is attached for the record.

CPUC approves the program outlined in the letter and accepts this off-site mitigation and restoration program in lieu of restoration at Rough Acres.

Background

In order to construct the Sunrise 500-kV transmission line, SDG&E established a number of construction yards along or near the route. These yards were approved as part of the overall project. Subsequently, SDG&E sought modifications to various aspects of the project, including to the Rough Acres yard. The Project Modification Report (May 14, 2010, page 4-51ff), discusses the modification to expand operations at Rough Acres.

“... The modification would increase ground disturbance by approximately 50 acres and would increase temporary impacts to Jacumba milk-vetch, chaparrals, coastal and montane scrubs, and visual resources. [Because it would eliminate the need to use other sites,] It would reduce impacts to non-vegetated channels, riparian and woodland habitats, Peninsular bighorn sheep habitat, and US and State waters.”

The project modification resulted in a new 92.46-acre yard west of McCain Valley Road in eastern San Diego County, north of Interstate 8. This yard consolidated some construction-related operations, facilitated aircraft operations, and increased the area available for storage and tower assembly. The consolidation allowed for the elimination of three yards planned elsewhere and totaling 91.72 acres.

A letter report, Rare Plant and Invasive Weed Report for the Rough Acres Construction Yard, dated September 28, 2010, was provided to SDG&E by its consultant RECON. It was reported that rare plant species identified during the survey at Rough Acres Phase II included Jacumba milk-vetch (*Astragalus douglasii* var. *perstrictus*) [CNPS rating 1B.2]¹ and sticky geraea (*Geraea viscida*) [CNPS rating 2.3], which were generally found in areas of mild disturbance and were distributed throughout the proposed

¹ California Native Plant Society ratings: List 1B (considered endangered throughout its range); List 2 (considered endangered in California but more common elsewhere). Impacts to CNPS List 1B and 2 species, due to their relatively high regional sensitivity, will require in-kind mitigation

construction site. Mountain Springs bush lupine (*Lupinus excubitus* var. *medius*) [CNPS rating 1B.3] was found at a single location off of an existing unpaved access road.

Notices to Proceed (NTPs) for Rough Acres Phase I Yard and for Rough Acres Phase II Yard were issued on September 28, 2010 (NTP #5) and December 28, 2010 (NTP #12), respectively. Phase I was on an already disturbed or developed portion of the site. In its November 29, 2010 request for approval for the use of Phase II of Rough Acres, SDG&E stated: "Upon completion of the Project, the Rough Acres Construction Yard will be restored to its original condition. This will include removal of any temporary facilities, as well as collection and proper disposal of any waste, trash, and debris. However, the owner-installed perimeter fence, aggregate base and crushed rock will be left in place per agreement with property owner."

The modification increasing the size of Rough Acres increased temporary impacts to the rare Jacumba milk-vetch (*Astragalus douglasii* var. *perstrictus*). Jacumba milk-vetch is a perennial herb with stout, erect stems that can grow up to 3 feet (1 meter) in height. This species ranges from Imperial and San Diego counties to Baja California. Most of the project's impacts to this species were at Rough Acres and mitigation for impacts to this species was anticipated to occur at Rough Acres. The Rough Acres Yard modification also increased temporary impacts to sensitive vegetation communities.

In a July 18, 2012, letter to Billie Blanchard at CPUC, John Gibson, Hamann Companies (Rough Acres property owner), expressed a desire to "keep using the yard, in its current state, going forward, without restoration." Mr. Gibson requested that SDG&E not conduct any additional restoration after completing site stabilization required to prevent erosion.

On August 10, 2012, CPUC met with SDG&E to discuss post-construction project requirements applicable to several locations and various landowners' requests, including a request for not restoring Rough Acres. In a letter dated August 17, 2012, CPUC granted SDG&E's requests to comply with a number of individual landowner requests (e.g., leaving a fence in place, leaving a gate, leaving property 'as-is', etc.). However, with regard to the Rough Acres property, the disturbed area of Phase II was to be restored. SDG&E was directed to restore the area as detailed in the Restoration Plan as soon as the need for Rough Acres for Sunrise construction and post-construction restoration was complete.

The area in question contained most of the Jacumba milk-vetch plants that were expected to be subject to temporary impact by the project (836 of 958 plants). Because site restoration was identified in the Restoration Plan for Special Status Plants, site clearing was accounted as a temporary impact in this area. Section 2.2.3 of the restoration plan states: "Restoration will occur primarily at the Rough Acres construction Yard, where the largest number of Jacumba milk-vetch will be affected." The plan states that restoration can also occur in the Temporary Impact Areas (TIAs) where 10 or more Jacumba milk-vetch plants have been documented.

In a February 5, 2013, letter to Billie Blanchard from John Gibson, Hamann Companies, the landowner asked CPUC to relieve SDG&E from its obligation to restore the property. The letter states that SDG&E's leases on the properties had expired, all alterations to the property belong to the landowner, and that SDG&E had no further right of access. The letter claimed that the property owner did not know of the restoration requirement and had it been known he would not have leased the property. The letter noted that SDG&E disagreed with Hamann Company's assertions and the utility maintained that it had the right to mitigate impacts per its obligations and, if necessary, could resort to eminent domain.

The February letter inaccurately characterizes the required restoration as creating a "perpetual encumbrance as open space." The only requirement imposed by CPUC on SDG&E is to restore the

property with appropriate vegetation. Failure to restore the site would make permanent the otherwise temporary impacts and this would require appropriate mitigation.

The Hamann Company letter stated that the property has been optioned to a solar developer, that the County of San Diego is processing a Major Use Permit for an 80 MW solar farm, and that SDG&E has signed a Power Purchase Agreement with the solar developer. The landowner expressed concern that the restoration obligation could affect the permitting process and stated that Hamann Company could lose more than \$2.2 million should the solar developer elect not to use the property.

A Major Use Permit (MUP) application has been made to San Diego County for the project and an Environmental Impact Report (EIR) is being prepared by Soitec Solar Development, LLC to construct solar facilities on the Rough Acres property and other properties in the area. CPUC confirmed that as of June 5, 2013, the application is active and the draft EIR is undergoing internal review at the County.

Conclusions

CPUC recognizes that compelling restoration of a property planned to be developed into a solar farm in the foreseeable future would be a waste of ratepayer money and would not achieve the objective of the mitigation measure. The objective is to ensure that the plant communities and special status plant species that were on the site previous to the Sunrise project be successfully reestablished or their loss mitigated.

By not restoring the Rough Acres site, the temporary impacts to plants become permanent. This status would require SDG&E to undertake offsetting mitigation elsewhere for the plant communities and Jacumba milk-vetch lost at Rough Acres.

The mitigation requirements for sensitive biological resources of the type at Rough Acres are:

- Semi-desert chaparral – mitigated at a 1:1 ratio for temporary and permanent impacts
- Flat-topped buckwheat scrub – mitigated at a 2:1 ratio for temporary and permanent impacts
- Jacumba milk-vetch – mitigated at a 1:1 ratio for temporary and permanent impacts

SDG&E has demonstrated that it has acquired sufficient acreage at its Long Potrero mitigation property at the required ratios to offset the lost semi-desert chaparral and flat-topped buckwheat scrub at Rough Acres.

The 923 Jacumba milk-vetch individuals at Rough Acres occupied approximately 18 acres. SDG&E has identified 54 acres of disturbed habitat suitable for milk-vetch restoration in the McCain Valley (where Rough Acres is located). This acreage is in the temporary impact areas associated with various tower construction sites and the McCain Valley construction yard. SDG&E's restoration activities will include supplemental seeding of Jacumba milk-vetch, salvage of individuals, and adaptive weed control at disturbed areas and in the project right of way. The restoration program will continue over approximately 5 years.

CPUC staff has reviewed your letter of May 24, 2013, replying to our request for information regarding how SDG&E will meet its obligations to mitigate for impacts that occurred from activities at Rough Acres Yard. A copy of your letter is attached for the record.

Based on the information provided in SDG&E May 24, 2013 letter and discussion with SDG&E on implementation of the restoration effort, CPUC approves the program outlined in the letter and accepts the program as a reasonable alternative to restoration of lands at Rough Acres.

Sunrise Powerlink Project – Rough Acres

June 18, 2013

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Regards

Billie Blanchard

CPUC Environmental Project Manager

Sunrise Powerlink Transmission Project

Cc Scott Pearson, SDG&E
Daryle Cheever, SDG&E
Marc Doalson, SDG&E
Jim Seifert, SDG&E
Robert Hingtgen, San Diego County Planning
James Whalen, Whalen Associates
John Gibson, Hamann Companies
Nicholas Sher, CPUC Legal
Merideth Sterkel, CPUC
Mary Jo Borak, CPUC
Fritts Golden, Aspen
Vida Strong, Aspen
Valerie Yep, Aspen
Shelby Howard, Helix

Attachment: SDG&E letter



Linda Collins
Manager – Sunrise Environmental
SDG&E Environmental Services
8315 Century Park Court
San Diego, CA 92123

May 24, 2013

Ms. Billie Blanchard
California Public Utilities Commission
505 Van Ness Avenue
4th Floor
San Francisco, CA 94102-3298

Re: SDG&E Reply to CPUC's Data Request for Rough Acres

Dear Ms. Blanchard:

On April 19, 2013, Fritts Golden (Aspen), Shelby Howard (Helix) and Marc Doalson (SDG&E) had a conference call to discuss a CPUC request for information letter dated March 14, 2013 and SDG&E's letter reply dated April 5, 2013 relating to project impacts within the Rough Acres construction yard to sensitive vegetation communities and sensitive plant species. The primary issues relate to the Rough Acres property owner refusing access to SDG&E for habitat restoration activities. The main issue for the conference call was a discussion of project mitigation requirements for temporary impacts to flat-topped buckwheat scrub, semi-desert chaparral and Jacumba milk-vetch (*Astragalus douglasii* var. *perstrictus*) within the Rough Acres construction yard.

On the April 19, 2013, call all parties concurred that SDG&E has a responsibility to mitigate project impacts to sensitive vegetation communities and Jacumba milk-vetch within the Rough Acres construction yard due to impacts resulting from project activities. In order to resolve the issue in a way that benefits biological resources along the project alignment the potential to change the characterization of all impacts within the Rough Acres construction yard from temporary to permanent was discussed, as it might be an acceptable method to the CPUC to ensure appropriate mitigation of biological values, and resolve the issue. The reasoning was twofold: (1) the mitigation ratios for impacts to semi-desert chaparral, flat-topped buckwheat scrub and Jacumba milk-vetch are the same regardless of the type of impact (temporary or permanent) since the project has already mitigated ratios greater than 1:1 at offsite mitigation properties; and (2) the Rough Acres landowner has proposed a renewable energy project at the site, and therefore it will not be possible to effectively restore the site. The proposed solution would allow for habitat restoration and enhancement activities within the project right-of-way and impact areas as well as additional offsite preservation of sensitive vegetation communities at project offsite mitigation properties. This will meet the project's mitigation obligations in lieu of restoration at Rough Acres.

The mitigation requirements for these sensitive biological resources are as follows:

- Temporary and permanent impacts to semi-desert chaparral are to be mitigated at a 1:1 ratio;
- Temporary and permanent impacts to flat-topped buckwheat scrub will be mitigated at a 2:1 ratio; and
- Temporary and permanent impacts to Jacumba milk-vetch will be mitigated at a 1:1 ratio (Restoration Plan for Special Status Plants [RPSP], § 1.1, page 3.).

As discussed on April 19, 2013, SDG&E proposes to achieve these mitigation ratios through the following steps:

1. Mitigate impacts to Jacumba milk-vetch as described in SDG&E's reply to the CPUC on the April 5, 2013 (referenced above). This includes:
 - a. Mitigate impacts to 923 Jacumba milk-vetch individuals within the Rough Acres construction yard through seeding and natural recruitment of Jacumba milk-vetch within temporary impact areas in McCain Valley (EP170 through EP221-2, including the McCain Valley construction yard). The 923 Jacumba milk-vetch individuals impacted within the Rough Acres construction yard occupied approximately 18 of the 70 acres impacted. There is approximately 54 acres of suitable habitat available for restoration of at least 923 Jacumba milk-vetch individuals within temporary impact areas being restored (EP170, EP171, EP172, EP173-1, EP174, EP175, EP176, EP177, EP178, McCain Valley construction yard, EP179, EP180, EP181, EP182, EP184-1, EP185-1, EP186-1, EP187-2, EP190-2, EP191-2, EP192-2, EP193-2, EP197-3, EP198-3, EP199-3, EP200-3, EP200A-1, EP201-3, EP202-3, EP203-3, EP204-3, EP205-2, EP206-1, EP207, EP208, EP209-1, EP210, EP211, EP213, EP214, EP215, EP217-1, EP218-1, EP219-1 and EP220-1) in McCain Valley, outside of the Rough Acres construction yard.
 - b. Enhancement of existing populations of Jacumba milk-vetch within the project right-of-way per Section 2.1.2 in the RPSP, as appropriate.
 - c. SDG&E will continue habitat restoration and enhancement efforts, including but not limited to supplemental seeding of Jacumba milk-vetch for the duration of the habitat restoration program, salvage of Jacumba milk-vetch individuals within vegetation management areas (i.e. project access roads, crane pads and structure pads) and adaptive weed control strategies within project impact areas as well as within the project right-of-way, as appropriate. The total number of individuals within temporary and permanent impact areas will be included in the Sunrise Powerlink Restoration Annual Monitoring and Maintenance Report(s) (related to Site Specific Restoration Plans [SRP] 07 through 14). The annual reports will detail the status of project habitat restoration activities for special-status plants and vegetation communities. Current estimates (March 25, 2013) of Jacumba milk-vetch individuals along with project impact acreages (temporary and permanent) within the McCain Valley area are included in Attachment A.

In aggregate, these efforts will meet if not exceed the total number of individuals required during the habitat restoration program, over the course of approximately 5-years, and ensure perpetuation of the species within project impact areas in McCain Valley. Per Section 5.2 in the appropriate SRP's, final success criteria will be met when the density and total population size in restored sites are comparable to the established reference site for each Jacumba milk-vetch restoration area.

2. Mitigate impacts to flat-topped buckwheat scrub and semi-desert chaparral as described in SDG&E's reply to the CPUC on the April 5, 2013 (referenced above). This mitigation will be achieved through preservation of similar habitats at SDG&E's Long Potrero mitigation property as described below.
 - a. Temporary and permanent impacts to flat-topped buckwheat scrub are mitigated at a 2:1 ratio. SDG&E has accounted for the first 1:1 portion, 27.82 acres of flat-topped buckwheat scrub, at the Long Potrero mitigation property. With the proposed action an additional 27.82 acres of flat-topped buckwheat scrub will be mitigated, (a total of 55.64 acres), for project impacts to this sensitive vegetation community within the Rough Acres construction yard. Accounting for this there will be 115.07 acres of flat-topped buckwheat scrub remaining on Long Potrero that has not been claimed to mitigate project impacts to this sensitive vegetation community. SDG&E permanently impacted an additional 0.67 acres of flat-topped buckwheat

scrub between EP78 (0.10 acre), EP179 (0.45 acre), CP95-1 (0.11 acre) and CP96-1 (0.01 acre) and owes an additional 1.34 acres, due to the 2:1 mitigation ratio, of compensation for this community. Pursuant to the approach outlined here, 56.98 acres of flat-topped buckwheat scrub impacts would be accounted for on the Long Potrero mitigation property, leaving a remaining excess of 113.73 acres of flat-topped buckwheat scrub available for other project mitigation requirements.

- b. Temporary and permanent impacts to semi-desert chaparral are mitigated at a 1:1 ratio. Mitigation for temporary impacts to semi-desert chaparral is generally accomplished for the project via habitat restoration. With the proposed action SDG&E plans to account for the 1:1, 41.06 acres of semi-desert chaparral, at the Long Potrero mitigation property in lieu of habitat restoration. The 41.06 acres of semi-desert chaparral will be mitigated through preservation of an additional 0.38 acres of northern mixed chaparral and 40.68 acres of southern mixed chaparral at Long Potrero. This will exhaust the additional acreage of northern mixed chaparral and leave an additional 546.58 acres of southern mixed chaparral on Long Potrero as mitigation for project impacts to this sensitive vegetation community.

SDG&E sent a preliminary table detailing project impacts, mitigation ratios and vegetation community acreages per project mitigation property to Mr. Golden and Mr. Howard on April 19, 2013. A final table will be produced and submitted to the CPUC when project impacts are finalized.

Sincerely,



Linda Collins
Manager – Sunrise Environmental
San Diego Gas & Electric Company

Enclosure

Cc:

Vida Strong
Fritz Golden
Shelby Howard
Nicholas Sher
Scott Pearson
Janice Schneider
David Barrett
Linda Collins
Dayle Cheever
Marc Doalson
Bryan Bennett
Keri Cuppage
Allison Willardson
Ileen Rodriguez

Attachment A

Project features in McCain Valley, vegetation community impact acreages, observed Jacumba milk-vetch individuals and impact types

Project Feature	Vegetation Community	Impact Acreage	Number of Jacumba milk-vetch Individuals	Temporary (TIA) or Permanent (PIA) Impact Areas
EP220-1	Developed	0.04	33	TIA
	Non-native Grassland - Disturbed	0.08		
	Redshank Chaparral	1.30		
	Semi-desert Chaparral	0.93		
EP219-1	Big Sagebrush Scrub	0.24	0	TIA
	Developed	0.01		
	Non-vegetated Channel	0.00		
	Northern Mixed Chaparral	1.74		
	Semi-desert Chaparral	2.36		
EP218-1	Diegan Coastal Sage Scrub - Inland Form	0.16	0	TIA
	Northern Mixed Chaparral	0.28		
EP217-1	Northern Mixed Chaparral	0.46	0	TIA
EP215	Chamise Chaparral	0.14	2	TIA
	Developed	0.03		
	Diegan Coastal Sage Scrub - Inland Form	1.70		
	Northern Mixed Chaparral	0.01		
	Semi-desert Chaparral	0.53		
EP214	Developed	0.02	3	TIA
	Diegan Coastal Sage Scrub - Inland Form	0.06		
	Diegan Coastal Sage Scrub - Inland Form - Disturbed	0.01		
	Semi-desert Chaparral	0.02		
EP213	Diegan Coastal Sage Scrub - Inland Form	0.44	0	TIA
EP211	Diegan Coastal Sage	0.03	0	TIA

Project Feature	Vegetation Community	Impact Acreage	Number of Jacumba milk-vetch Individuals	Temporary (TIA) or Permanent (PIA) Impact Areas
	Scrub - Inland Form			
	Semi-desert Chaparral	0.43		
EP210	Developed	0.00	0	TIA
	Diegan Coastal Sage Scrub - Inland Form	0.43		
EP209-1	Non-native Grassland	0.24	0	TIA
EP208	Diegan Coastal Sage Scrub - Inland Form	0.10	7	TIA
	Diegan Coastal Sage Scrub - Inland Form - Disturbed	0.01		
	Semi-desert Chaparral - Disturbed	0.00		
EP207	Diegan Coastal Sage Scrub - Inland Form - Disturbed	0.08	0	TIA
	Semi-desert Chaparral - Disturbed	0.04		
EP206-1	Semi-desert Chaparral - Disturbed	0.14	2	TIA
EP205-2	Semi-desert Chaparral	0.55	0	TIA
EP204-3	Developed	0.09	26	TIA
	Semi-desert Chaparral	1.54		
EP203-3	Semi-desert Chaparral	1.00	0	TIA
EP202-3	Semi-desert Chaparral	0.16	0	TIA
EP201-3	Semi-desert Chaparral	0.18	16	TIA
	Semi-desert Chaparral - Disturbed	0.00		
EP200A-1	Semi-desert Chaparral	0.09	0	TIA
EP200-3	Redshank Chaparral	0.37	2	TIA
	Semi-desert Chaparral - Disturbed	0.88		
EP199-3	Diegan Coastal Sage Scrub - Inland Form	0.14	0	TIA
EP198-3	Developed	0.00	0	TIA
	Semi-desert Chaparral	0.08		
EP197-3	Developed	0.00	0	TIA
	Semi-desert Chaparral	0.28		
EP193-2	Diegan Coastal Sage	0.09	0	TIA

Project Feature	Vegetation Community	Impact Acreage	Number of Jacumba milk-vetch Individuals	Temporary (TIA) or Permanent (PIA) Impact Areas
	Scrub - Inland Form			
	Redshank Chaparral	0.02		
	Semi-desert Chaparral	1.09		
EP192-2	Redshank Chaparral	0.27	0	TIA
	Semi-desert Chaparral	1.34		
EP191-2	Redshank Chaparral	0.06	0	TIA
	Semi-desert Chaparral	0.01		
EP190-2	Semi-desert Chaparral	0.48	0	TIA
EP187-2	Semi-desert Chaparral	2.93	3	TIA
EP186-1	Scrub Oak Chaparral	0.12	0	TIA
EP185-1	Non-vegetated Channel	0.00	0	TIA
	Semi-desert Chaparral	0.09		
EP184-1	Developed	0.08	0	TIA
EP182	Semi-desert Chaparral	0.09	0	TIA
EP181	Chamise Chaparral	0.05	0	TIA
	Semi-desert Chaparral	0.00		
EP180	Semi-desert Chaparral	0.07	0	TIA
EP179	Flat-topped Buckwheat Scrub	0.02	0	TIA
	Semi-desert Chaparral	0.06		
CY McCain Valley	Non-vegetated Channel	0.01	5	TIA
	Semi-desert Chaparral	29.74		
	Chamise Chaparral	1.10		
EP178	Semi-desert Chaparral	0.62	0	TIA
EP177	Chamise Chaparral	0.05	0	TIA
	Northern Mixed Chaparral	0.04		
EP176	Northern Mixed Chaparral	0.18	0	TIA
EP175	Northern Mixed Chaparral	0.11	0	TIA
EP174	Northern Mixed Chaparral	0.16	0	TIA
EP173-1	Developed	0.00	0	TIA
	Northern Mixed Chaparral	0.10		

Project Feature	Vegetation Community	Impact Acreage	Number of Jacumba milk-vetch Individuals	Temporary (TIA) or Permanent (PIA) Impact Areas
EP172	Northern Mixed Chaparral	0.21	0	TIA
EP171	Northern Mixed Chaparral	0.10	0	TIA
EP170	Northern Mixed Chaparral	4.46	0	TIA
Total Individuals in TIA			99	
EP220-1	Non-vegetated Channel	0.00	5	PIA
	Semi-desert Chaparral	1.04		
EP215	Chamise Chaparral	0.01	0	PIA
	Developed	0.01		
	Diegan Coastal Sage Scrub - Inland Form	0.49		
EP214	Developed	0.01	0	PIA
	Diegan Coastal Sage Scrub - Inland Form	0.24		
	Semi-desert Chaparral	0.01		
EP213	Developed	0.00	0	PIA
	Diegan Coastal Sage Scrub - Inland Form	0.62		
EP211	Developed	0.04	0	PIA
	Semi-desert Chaparral	0.40		
EP210	Diegan Coastal Sage Scrub - Inland Form	0.46	0	PIA
EP209-1	Non-native Grassland	0.34	0	PIA
	Northern Mixed Chaparral	0.08		
EP208	Diegan Coastal Sage Scrub - Inland Form	0.26	2	PIA
	Diegan Coastal Sage Scrub - Inland Form - Disturbed	0.12		
	Northern Mixed Chaparral	0.03		
	Semi-desert Chaparral - Disturbed	0.16		
EP207	Diegan Coastal Sage Scrub - Inland Form -	0.13	0	PIA

Project Feature	Vegetation Community	Impact Acreage	Number of Jacumba milk-vetch Individuals	Temporary (TIA) or Permanent (PIA) Impact Areas
	Disturbed			
	Semi-desert Chaparral - Disturbed	0.31		
EP206-1	Semi-desert Chaparral - Disturbed	0.26	2	PIA
EP205-2	Semi-desert Chaparral	0.36	0	PIA
EP204-3	Semi-desert Chaparral	0.37	0	PIA
EP203-3	Semi-desert Chaparral	0.41	0	PIA
EP202-3	Semi-desert Chaparral	0.47	0	PIA
EP201-3	Semi-desert Chaparral	0.39	10	PIA
	Semi-desert Chaparral - Disturbed	0.00		
EP200A-1	Semi-desert Chaparral	0.34	13	PIA
EP196-2	Semi-desert Chaparral	0.23	0	PIA
EP195-2	Semi-desert Chaparral	0.27	0	PIA
EP194-3	Semi-desert Chaparral	0.21	0	PIA
EP189-3	Semi-desert Chaparral	0.15	0	PIA
EP188-1	Non-vegetated Channel	0.00	0	PIA
	Semi-desert Chaparral	0.15		
EP187-2	Developed	0.05	0	PIA
	Non-vegetated Channel	0.00		
	Semi-desert Chaparral	0.57		
EP183	Northern Mixed Chaparral	0.65	0	PIA
EP152-2	Northern Mixed Chaparral	0.12	0	PIA
Total Individuals in PIA			32	