Valley Center Storage Project

Conceptual Revegetation Plan
San Diego County, California

Project Number:

PDS-2020-STP-20-011

Prepared for the County of San Diego

Developer:

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TABLE OF CONTENTS

Page

LIST OF TABLES

Page

LIST OF FIGURES

Page

APPENDIX A – BIOLOGY REPORT (CHAMBERS GROUP 2020)
APPENDIX B – SITE PHOTOGRAPHS

SECTION 1.0 – INTRODUCTION

1.1 PURPOSE OF THE CONCEPTUAL REVEGETATION PLAN

Chambers Group was retained by Valley Center ESS, LLC (Developer) to prepare a conceptual revegetation plan for the Valley Center Storage Project (Project) in accordance with the County of San Diego's Revegetation Plan Report Format and Content Guidelines (County of San Diego 2007). The purpose of this Conceptual Revegetation Plan is to describe the vegetation restoration methods by which the Developer shall mitigate for loss of 0.62 acres of native habitat, as proposed by the Project.

This Conceptual Revegetation Plan (Plan) was prepared to provide a description of the revegetation that would occur should the mitigation requirements for the Project be satisfied through the revegetation and enhancement of habitat located on the Project site. It is based on the level of detail known at this time and is subject to change based on, including but not limited to, project design, regulatory review, and project requirements, and on-the-ground conditions. If the Project elects to satisfy mitigation requirements through the revegetation and enhancement of habitat located on the Project site, a Final Revegetation Plan may be required as a condition of the project, to be completed at a later date (i.e. prior to grading).

Additionally, this Plan provides the means and methods to restore the underground generation tie line (gen-tie line), the portion of the Project subject to temporary impacts. These temporary impacts will be reseeded with the seed mixture described in this Plan and as such are not subject to mitigation.

1.2 RESPONSIBLE PARTIES

Valley Center ESS, LLC is responsible for all aspects of the Project.

1.3 LOCATION OF THE DEVELOPMENT PROJECT

The Project site is located at 29523 Valley Center Road, Valley Center, California on an 8.93-acre parcel of private land (APN 189-013-20-00) within unincorporated Valley Center in northern San Diego County (Figure 1). The Project site is located south of Valley Center Road and east of Cole Grade Road, within the United States Geological Survey (USGS) Valley Center, California, 7.5-minute topographical quadrangle. For the purposes of this document, the Project site is defined as the 8.93-acre parcel and the Project-controlled access easement. The Project Area is described as the Project site and the off-site underground generation tie line alignment. Project Area elevations range from approximately 1,350 to 1,420 feet above mean sea level (amsl). Surrounding land uses include several storage facilities, propane gas distributors, and the adjacent San Diego Gas and Electric (SDG&E) Valley Center Substation with multiple silverleaf mountain gum (*Eucalyptus pulverulenta*) groves used for the cut flower trade to the east and south, commercial and residential properties located on industrial-zoned parcels to the west and north. The Project Area is located within the boundaries of the County's Draft North County MSCP (NCMSCP) Subarea Plan; however, is outside the Pre-Approved Mitigation Area (PAMA) (County 2009).

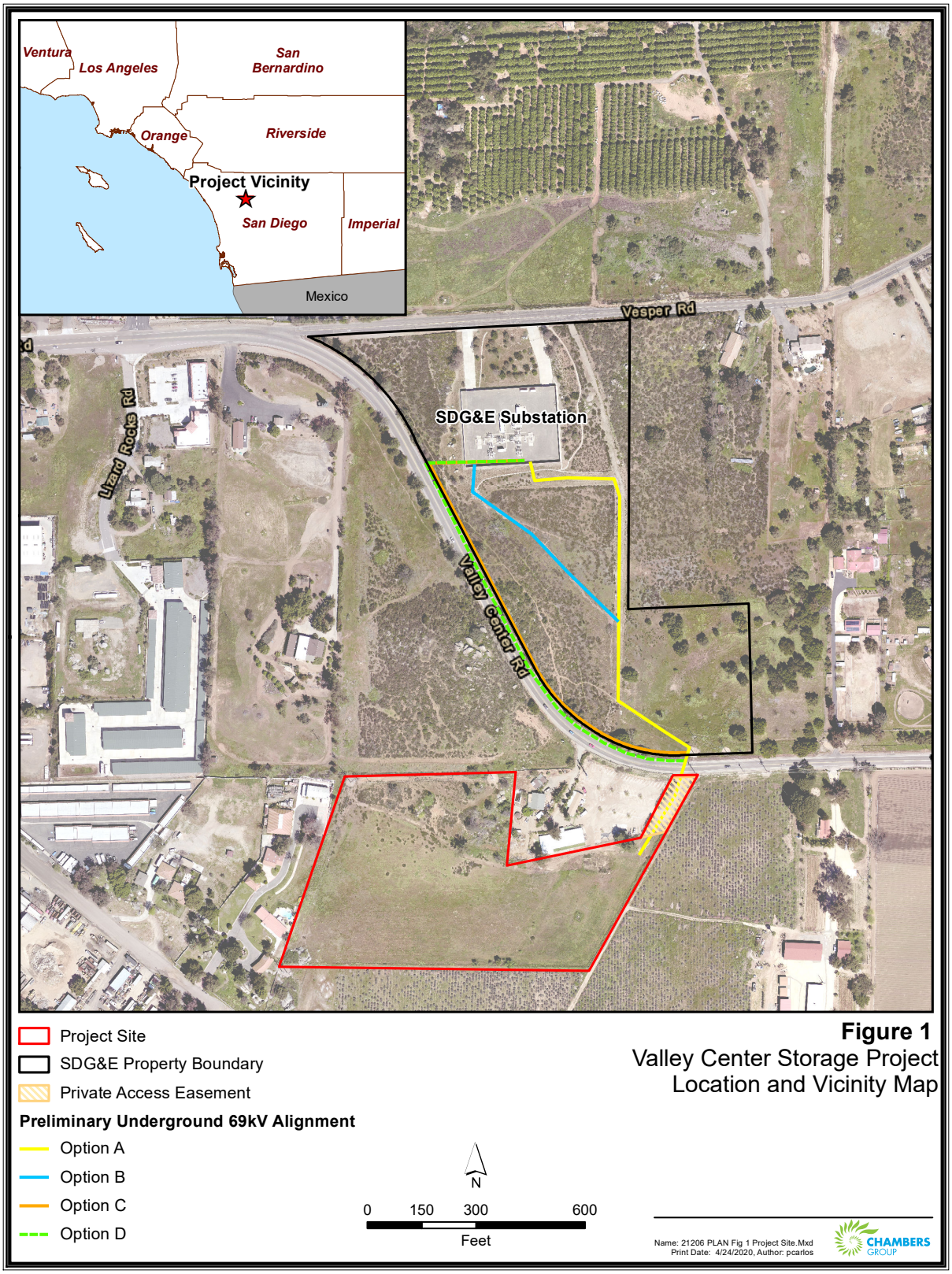
For the purposes of this Plan, Project site is defined as the 8.93-acre parcel and the Project-controlled access easement (Figure 1). The Project site with the offsite underground generation tie-line alignment is referred to as the Project Area (Figure 1).

1.4 SUMMARY OF OVERALL DEVELOPMENT PROJECT

The Developer plans to construct, own and operate the Valley Center Storage Project, a lithium-ion based battery energy storage facility capable of delivering up to 140 megawatts (MW) for approximately 4 hours on an 8.93-acre parcel in Valley Center, San Diego County. The Project will interconnect to the existing, adjacent San Diego Gas & Electric (SDG&E) 69 kilovolt (kV) Valley Center Substation via an approximately 0.3-mile underground gen-tie line. The Project will be comprised of sets of four battery enclosures (each enclosure approximately 31.6 feet long by 5.7 feet wide by 8.6 feet high) that will house the integrated Battery Energy Storage System (BESS) including battery cells, modules, racks, a fully integrated fire and safety systems, heating, ventilation, and air conditioning (HVAC) systems, and other electrical systems. The batteries will be charged from the CAISO (California Independent System Operator) grid via the Project's interconnection to the SDG&E Valley Center Substation. Energy stored in the Project will then be discharged back into the grid when the energy is needed, providing essential electricity reliability services to the local area.

The Project plans to start construction in the fourth quarter of 2020 and begin operations by August 1, 2021.

Figure 1 – Project Location and Vicinity Map



1.4.1 Current Environmental Setting and Site Conditions

A general biological reconnaissance-level survey was conducted by Chambers Group biologists in November 2019 (Appendix A) with a follow-up nesting bird and focused plant survey in March 2020. Biologists revisited the Project Area in May 2020 to verify conditions had not changed, and to collect data from a reference location containing moderate-quality habitat within 500 feet of the Project Area. The Project site primarily consists of disturbed land that was previously used as farmland and has been extensively graded and leveled. Small areas of low-quality Diegan Coastal Sage Scrub: Inland Form (CSS) habitat and exposed bedrock are also located within the Project site, primarily along the northern portion of the Project site.

Four alignment options are being considered and were evaluated for the gen-tie line (Appendix A; Figure 1). All four options leave the Project site access easement, cross under Valley Center Road and then:

- Option A: enters SDG&E's property and heads north, adjacent to existing SDG&E underground circuits within SDG&E's property and enters the substation at the point of interconnect.
- Option B: enters SDG&E's property following Option A but travels across the property in a northwesterly direction until reaching the substation.
- Option C: follows the southern and western property boundaries within SDG&E's property until turning easterly to access the substation from the west.
- Option D: follows the west-bound Valley Center Road right-of-way before entering SDG&E's property, following Option C in the easterly direction to access the substation.

To varying degrees, the alignment options are located within or adjacent to bare ground, non-native grassland, and CSS of varying quality (Appendix A; Figure 3). These habitat types would be temporarily impacted during installation of the gen-tie line. Regardless of the alignment ultimately selected, temporary impacts would be restored to pre-Project conditions. Installation of Project facilities on the Project site (Project site development footprint) would result in permanent impacts.

Direct impacts include the physical loss or removal of vegetation due to installation of Project facilities or work areas. All permanent impacts will occur to habitat that is non-sensitive in nature and that has been highly disturbed by past agricultural activities. Total permanent direct impacts by vegetation type are detailed in Table 1 below.

Table 1: Direct Impacts by Vegetation Type

Vegetation Type / Other Areas	Existing (acres)	Impacts (acres)	Mitigation Ratios	Mitigation Acreage
Disturbed Habitat	5.79	5.76	N/A	0
Bare Ground	0.18	0.18	N/A	0
Diegan Coastal Sage Scrub: Inland Form	0.62	0.62	1:1	.62
Urban/Developed	0.05	0.05	N/A	0

Vegetation Type / Other Areas	Existing (acres)	Impacts (acres)	Mitigation Ratios	Mitigation Acreage
Total	6.64	6.61	-	-

1.4.2 Impacts to Special Status Plant Species

After the literature review (CNPS 2019, CDFW 2019), assessment of the various habitat types in the Project Area, and the reconnaissance-level survey was conducted, it was determined that 28 of the 39 sensitive plant species with a potential to occur in the area are considered absent from the Project Area. Of the remaining 10 sensitive plant species, eight had a Low potential to occur and two had a Moderate potential to occur in the Project Area. None of the sensitive plant species with a potential to occur in the Project Area are state- or federal-listed or have a level 4 or higher CRPR rank and therefore do not require mitigation or protection. In addition, no special status plant species were observed within the Project Area.

As a follow-up to the reconnaissance-level survey, a focused plant survey was conducted in March 2020. As the survey was conducted within the blooming period of the following special status plant species: Robinson's peppergrass (*Lipidium virginicum* var. *robinsonii*), Payson's jewelflower (*Caulanthus simulans*), and western dichondra (*Dichondra occidentalis*) and none were observed, these special status plant species are also considered absent from the Project Area. No impacts to special status plant species are expected from the Project.

1.4.3 Impacts to Special Status Wildlife

Impacts to special status species may occur either through temporary or permanent habitat loss, interruption of normal species routines, or through direct mortality.

Potential impacts to special status species associated with the Project were assessed by analyzing species-specific requirements, including necessary vegetation habitat, elevational range, foraging needs, denning or breeding requirements, migratory trends, current ranges, and known occurrences or records. After the literature review (CDFW 2019), the assessment of the various habitat types in the Project Area plus a 100-foot buffer, and the reconnaissance-level survey was conducted, it was determined that within the Project Area eight of the 46 sensitive wildlife species are considered Absent, 32 species have a Low potential to occur, three species have a Moderate potential to occur, and three species have a High potential to occur.

While a solitary coastal California gnatcatcher (*Polioptila californica californica*) was heard calling from scrub habitat west of the Project Area, this species is not expected to nest within the Project Area or surrounding native habitat due to a lack of preferred nesting sites dominated by California sagebrush and a lack of habitat connectivity to patches of more favorable/higher-quality habitat. This species may forage within and surrounding the Project Area. With proper construction best management practices (BMP), no impacts are anticipated to these species as a result of Project related activities. BMPs discussed for this Project will be presented in the Coastal California Gnatcatcher Survey Results Report upon completion (Chambers Group 2020, in progress).

1.4.4 Impacts to Migratory Birds

Direct impacts include the physical loss or removal of vegetation due to installation of Project facilities or work areas. Indirect impacts during construction may include interruption of normal nesting or foraging behaviors, loss of prey items, such as insects or food resources, or the suppression of growth due to excessive dust or noise.

In order to comply with the Migratory Bird Treaty Act (MBTA) and County regulations, any vegetation clearing should take place outside the general bird breeding season (February 1 to August 31), to the maximum extent practical. If this is not possible, prior to ground-disturbing activities, a qualified biologist should conduct and submit a migratory nesting bird and raptor survey report. The survey should occur no more than 72 hours prior to initiation of Project construction activities, and any occupied passerine and/or raptor nests occurring within or adjacent to the Survey Area should be delineated. Additional follow-up surveys may be required by the resource agencies. If an active nest is identified, an avoidance buffer zone around occupied nests (as determined by the avian biologist) should be maintained during physical ground-disturbing activities. The buffer zone should be sufficient in size to prevent impacts to the nest. Once nesting has ceased, the buffer may be removed.

SECTION 2.0 – COMPENSATORY MITIGATION GOALS

2.1 RESPONSIBILITIES

Valley Center ESS, LLC will construct, own, and operate the Project. A summary of the responsibilities required as part of this Plan are presented in Table 2.

Table 2: Responsible Parties

Title	Responsibility	Organization	Contact
Project Developer	Review site documentation, maintain cost effectiveness, coordinate with resource agencies	Project Engineer, or Designated Contractor	Mark Turner Valley Center ESS, LLC 11455 El Camino Real, Suite 160 San Diego, CA 92130 Phone (916) 835-8119 Email: mturner@terra-gen.com
County of San Diego	Review site documentation	Department of Planning and Land Use, Department of Public Works	Regina Ochoa Land Use and Environment Group County of San Diego 5510 Overland Ave, Suite 310, San Diego, CA 92123 Phone (858) 495-5338Email: regina.ochoa@sdcounty.ca.gov
Compensatory Mitigation Project Designer	Preparation of Revegetation Plan	Chambers Group, Inc.	Heather Clayton 9620 Chesapeake Drive, Suite 202 San Diego, CA 92123 (949) 261-5414 ext. 7241 hclayton@chambersgroupinc.com
Installation Contractor	Site preparation, application of seeds	Landscape Contractor, Hydroseeder	To be determined.
Revegetation Monitor	Maintenance and performance monitoring and reporting	Chambers Group, Inc.	Clark Austin 9620 Chesapeake Drive, Suite 202 San Diego, CA 92123 (858) 541-2800 ext. 7118 caustin@chambersgroupinc.com
Revegetation Maintenance Contractor	Site maintenance, remedial seeding/other measures	Native Habitat Landscape Contractor	To be determined.

2.2 COMPENSATORY MITIGATION

Under the County of San Diego's Zoning Ordinance (Ordinance), the Project is considered a "minor impact utility" which is defined as follows:

> *The Minor Impact Utilities use type refers to public utilities which have a local impact on surrounding properties and are necessary to provide essential services. Typical uses are electrical and gas distribution substations.*

Because the Project's distribution line will be both underground and is significantly less than 230kV, the Project is a "minor impact utility." In addition, the Project is located on a parcel zoned as I-2 (Medium Impact Industrial) and M-54 Use Regulation. The Ordinance defines uses which are permitted (by right), permitted by administrative authority, permitted by Site Plan, permitted by minor use permit, permitted by major use permit, permitted only within planned developments of 20 acres or larger, or not permitted. A "Minor Impact Utility" is a permitted (by right) use within the M-54 use Regulation. Therefore, the Project is permitted by right and a use permit from the County will not be required.

In order to comply with the County's CEQA significance thresholds for biology (County 2007), any impacts to native habitat has the requisite mitigation ratios. The Project development footprint on the Project site would permanently impact 0.62 acres of low-quality Diegan Coastal Sage Scrub, which is a Tier II vegetation community under the County's Biological Mitigation Ordinance (BMO). As such, the Project will mitigate this impact at a ratio of 1:1.

As the ultimate gen-tie alignment has not yet been selected, habitats that would potentially be impacted by each of the four gen-tie line alignment options are shown in Table 3. All impacts associated with the gen-tie line are temporary and will be reseeded with the seed mixture described in this Plan; therefore no mitigation is required.

Table 3: Estimates of Project Disturbance to Vegetation Communities within each Gen-tie Alignment Option

Project Options	Habitat Type	Holland Code*	Estimated Disturbance (Acres)
A	Bare Ground	N/A	0.66
	Diegan Coastal Sage Scrub: Inland Form	32520	0.14
	Disturbed	11300	0.09
	Non-Native Grassland	42200	0.41
	Urban/Developed	12000	0.09
	Option A Totals		**1.39**
B	Bare Ground	N/A	0.10
	Diegan Coastal Sage Scrub: Inland Form	32520	0.03
	Disturbed	11300	0.01
	Non-Native Grassland	42200	0.43

Project Options	Habitat Type	Holland Code*	Estimated Disturbance (Acres)
	Urban/Developed	12000	0.03
	Option B Totals		**0.60**
C	Bare Ground	N/A	0.03
	Diegan Coastal Sage Scrub: Inland Form	32520	0.43
	Disturbed	11300	0.11
	Non-Native Grassland	42200	0.19
	Urban/Developed	12000	0.58
	Option C Totals		**1.34**
D	Bare Ground	N/A	0.01
	Diegan Coastal Sage Scrub: Inland Form	32520	0.09
	Disturbed	11300	0.10
	Non-Native Grassland	42200	0.07
	Urban/Developed	12000	1.07
	Option D Totals		**1.34**

*Codes derived from Holland, R.R. (1986) *Preliminary Descriptions of the Terrestrial Natural Communities of California.* State of California, Resources Agency, Department of Fish and Wildlife, Sacramento, California.

2.2.1 Cumulative Impact Analysis

Section 15183 under the California Environmental Quality Act (CEQA) Guidelines, allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified. Projects that are consistent with the County of San Diego's EIR for the General Plan Update (GPU), dated August 3, 2011, may qualify for a 15183 exemption. This Project qualifies for the 15183 exemption as it meets the following criteria:

- The project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.
- There are no project specific effects which are peculiar to the project or its site.
- There are no project specific impacts which the GPU EIR failed to analyze as significant effects.
- There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.
- There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.

The Project would not result in cumulative impacts with incorporation of the proposed mitigation measures.

2.3 TIME LAPSE

The time lapse between impacts and expected compensatory mitigation success is minimal (as little as one growing season to no more than 5 years) due to the current low-quality status of the habitat on the Project site prior to construction. Although some foraging by native bird species occurs at the Project Area, there is moderate to high-quality habitat within the vicinity of the Project Area and temporal impacts are not anticipated.

2.4 COST

Estimated costs associated with revegetation of the Compensatory Mitigation Site are summarized in Table 4 below. These costs are conceptual, preliminary estimates and are subject to change during implementation of the Final Revegetation Plan.

Table 4: Estimated Cost Summary for Revegetation/Restoration Activities

Task Number	Task Description	Schedule	Estimated Cost
Biological Monitoring Services			
1	Biological monitor to provide environmental training	Post-grading, prior to restoration	$2,500
2	Biological monitor to approve irrigation system plans	Prior to seed mix installation	$0
3	Biological Monitoring during site preparation and seeding	During implementation	$2,500
4	Coordination with NPLC, LACDRP; Meetings	On-Going	$5,800
5	Revegetation Maintenance Monitoring	Years 1-5 Post-Installation	$10,998
6	Performance Monitoring for Plant Growth	Years 1-5, one-year post-installation	$12,270
7	As-Built Report/Installation Summary Letter Report	Post-Installation	$2,550
8	Progress Reports	Years 1-5, Post-Installation	$4,662
9	Annual Status Reports	Years 1-5, Post-Installation	$16,870
10	Notification of Completion	Post-Restoration	$3,500
11	Project Management and Scheduling	Years 0-5	$8,940
Estimated Total Biological Monitoring Services			***$70,590***
Task Number	**Task Description**	**Schedule**	**Estimated Cost**
Restoration Implementation/ Landscape Contractor Services			
1	Trash Removal	Pre/Post-Grading	$500
2	Weed Control	Pre/Post-Grading	$124,192
3	Install "Natural Habitat Area" Signs	Prior to Seed Mix Installation	$1,380
4	Seed Collection	Pre-Grading	$4,141
5	Hydroseeding	Post-Site Prep	$4,528
6	Mulch	Post Hydroseeding	$7,357
7	Mycorrhizae Inoculation	During Hydroseeding	$3,149
8	Fencing, Resource Protection	Post-Construction	$5,200
9	Plant Replacement (10% re-seeding)	2 years Post Installation (if needed)	$3,686
Estimated Total Revegetation/Restoration Implementation Services			***$154,137***
		ESTIMATED TOTAL ALL TASKS	***$224,727***
		3% INFLATION PER YEAR (MONITORING AND MAINTENANCE)	***$9,659***
		20% CONTINGENCY	***$44,945***
		ESTIMATED GRAND TOTAL	***$279,3331***

SECTION 3.0 – COMPENSATORY MITIGATION SITE DESCRIPTION

3.1 SITE SELECTION

The Compensatory Mitigation Site is located on the Project site (as shown on Figure 2) and was selected as this land is already owned by the Developer and the habitat would benefit from enhancement through weed control and seeding of native species. The current habitat value is low, while surrounding areas adjacent to the Project site have a high habitat value. The primary target functions of the revegetation program are to increase native plant cover and diversity to provide foraging, nesting, and habitat linkage corridors for native wildlife. Not all of the land within the Project Area will be permanently impacted by Project activities. Areas within the Project Area that will be temporarily impacted will be revegetated following construction. Access for the Landscape Contractors and Revegetation Monitor will remain possible through locked gates to facilitate revegetation implementation and maintenance. Public access is unauthorized and will be restricted, thereby protecting the habitat resources.

As the Project Area currently supports some native plant species as well as an abundance of non-native weedy species, it can be inferred that soils are not problematic and likely suitable for the establishment of additional native plant species.

3.2 LOCATION AND SIZE OF SITE

As stated above, mitigation will occur on the Project site. As shown on Figure 2, approximately 1.64 acres at the northwestern corner of the Project site are included in the Compensatory Mitigation Site outside the Project site development footprint, but still contained within the Project site (Figure 2). The Compensatory Mitigation Site is larger than the 0.62 acres of direct impacts to ensure that the enhancement of existing low quality habitat provides an increase in biological function equal to or greater than the direct impacts to 0.62 acres of CSS.

3.3 JURISDICTIONAL WETLANDS AND WATERWAYS

No recorded blue-line features or known wetlands that may be subject to jurisdiction under the United Sates Army Corps of Engineers (USACE), the Regional Water Quality Control Board (RWQCB), or the California Department of Fish and Wildlife (CDFW) were identified within the Project site. As no jurisdictional features were observed within the Project Area, the Project does not have the potential to result in impacts to jurisdictional features and therefore, Section 404 and 401 permits are not required.

There were two topographical features of note within the Project site that may collect runoff from storm events. One depressional feature, also described as a “sump,” is located near the southern end of the Project-controlled easement. This feature was dominated by upland vegetation and had no clear outlet. A second feature, a topographical depression, runs northeast to southwest along the central portion of the Project site. This second feature displayed no surface hydrology and was dominated by upland vegetation. Historical satellite imagery shows the second depressional feature had been actively mowed perpendicular to the natural slope of the land as recently as 2008.

3.4 TYPES, FUNCTIONS AND VALUES OF HABITATS TO BE IMPACTED

Four vegetation communities in addition to Bare Ground, Rock, and Urban/Developed were mapped within the Project Area: Disturbed Habitat, Non-Native Grassland, CSS, and Extensive Agriculture – Row

Crops. Photographs of the vegetation in the Project Area can be found in Appendix B and mapped vegetation communities within the Vegetation Survey Area are depicted on Figure 3 of Appendix A.

Areas of CSS within the Project Area were very open, with native California buckwheat (*Eriogonum fasciculatum*) present as the primary shrub species. The inter-shrub matrix of the CSS habitat was dominated by non-native forbs and grass species that were similar in composition to the disturbed area to the south.

3.4.1 Permanent Impacts

The area of CSS that will be permanently impacted by the Project is within a transition zone between the disturbed habitat of the lowland areas dominated by non-native species and areas further to the north comprised of chaparral species (Figure 2). Species richness was high within the low-quality CSS, and while California buckwheat exhibited the greatest cover within the CSS areas, non-native species continued to play a major role in the species cover.

Mitigation is required for permanent impacts that occur to CSS at a 1:1 ratio for a total of 0.62 acres. Due to the low-quality and amount of non-native species within the CSS habitat that is located within the Project site development footprint, a higher mitigation ratio is not required. The sensitive habitat areas to be impacted are along the interface between disturbed habitat and discontinuous patches of surrounding the CSS vegetation. This habitat does provide foraging potential for native species; however, is not expected to support special status native bird or animal species.

As the non-native grassland habitat on the Project site has been created by past human activity and currently represents a low quality habitat, the Project proposes to revegetate non-native grassland areas impacted by construction with native species the land formerly supported. Although this represents an "out of kind" habitat type, the new habitat is expected to increase the biological function and value of the habitat following completion of the revegetation effort.

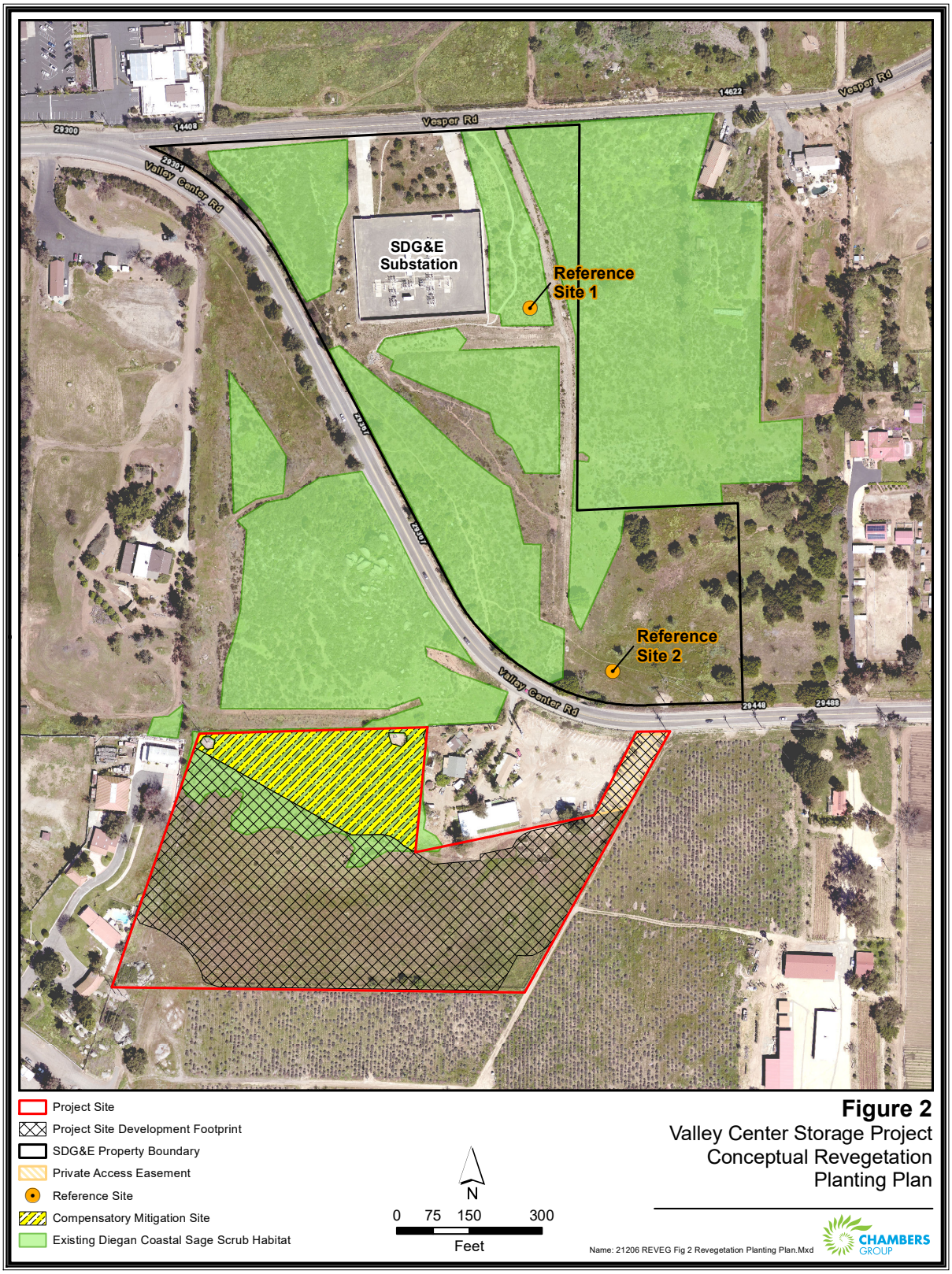
Mitigation requirements for permanent impacts are proposed to be fulfilled through on-site enhancement. This enhancement will involve a combination of hand seeding and hydroseeding, non-native plant species weed control, and monitoring. A CSS plant palette will be used to revegetate all areas on the Project site that require mitigation.

3.4.2 Temporary Impacts

Temporary impacts are limited to disturbance associated with installation of the underground generation tie-line. To varying degrees, the alignment options are located within or adjacent to bare ground, non-native grassland, and CSS of varying quality. These vegetative communities would be temporarily impacted during installation of the gen-tie line. Regardless of the alignment ultimately selected, temporary impacts would be restored to pre-Project conditions and no mitigation is required.

Restoration efforts associated with the temporary impacts will involve a combination of hand seeding and hydroseeding. A CSS plant palette will be used to restore all temporary disturbance areas along the gen-tie line. Although this represents an "out of kind" habitat type, the new habitat is expected to increase the biological function and value of the habitat following completion of the revegetation effort.

Figure 2 – Revegetation Planting Plan



3.4.3 Disturbed Habitat

Areas classified as Disturbed Habitat tend to be dominated by pioneering herbaceous species that readily colonize disturbed ground and that are typically found in temporary, often frequently disturbed habitats (Barbour et al. 1999), and that have a high percentage of non-native weedy species (i.e., greater than 25 percent of the species cover). The soils in Ruderal/Disturbed areas are typically characterized as heavily compacted or frequently disturbed. The vegetation in these areas is adapted to living in compact soils where water does not readily penetrate the soil. This habitat is found in a variety of locations within the Project Area; however, it is most frequently associated with areas along access roads located within the Project Area.

Dominant plant species identified within the Ruderal/Disturbed portions within the Project Area include: short-pod mustard (Hirschfeldia incana), deerweed (*Acmispon glaber*), leafy fleabane (*Erigeron foliosus* var. *foliosus*), hooked navarretia (*Navarretia hamata* ssp. *hamata*), dove weed (*Croton setigerus*), and foxtail brome (*Bromus madritensis*). A total of 9.59 acres of this habitat is located within the Vegetation Survey Area (which encompasses the Project Area); 5.79 acres of this habitat are located within the Project site development footprint.

3.4.4 Non-Native Grassland

This grassland habitat is dominated by a variety of non-native grass species dominated by species in the *Bromus* and *Avena* genera; this habitat is found in a variety of locations throughout the Project Area. This community is generally of low ecological value and is dominated by non-native and generally invasive annual grass species with a lesser amount of forb and early successional shrub species.

This area of wild oat and annual brome grassland was typified by a higher concentration of forb and non-grass herbaceous species than other areas of this habitat within the Project Area. It appears these areas are not regularly maintained allowing more substantive vegetation to establish. Dominant plant species within the Project site include wild oat (*Avena* sp.), ripgut brome (*Bromus diandrus*), foxtail brome, slender buckwheat (*Eriogonum gracile*), strigose lotus (*Acmispon strigosus*), leafy fleabane, and phacelia (*Phacelia* sp.).

Other locations within the Project Area that consist of this habitat include along the disturbed margins of the access road network within the SDG&E property boundary and within the inter-shrub matrix within the CSS habitat. Dominant plant species in areas outside the Project Area include foxtail brome, wild oat, ripgut brome, and short-pod mustard. A total of 6.10 acres of this habitat is located within the Vegetation Survey Area; this habitat is not located within the Project site development footprint.

3.4.5 Diegan Coastal Sage Scrub: Inland Form

Diegan Coastal Sage Scrub: Inland Form is comprised of herbaceous and low-glowing woody shrubs that are often summer drought deciduous. California buckwheat (*Eriogonum fasciculatum*) is in the shrub layer. This plant community is found in upland areas that is often an early scrubland habitat quickly following a disturbance event. Within the Project Area, two forms of this habitat were present; an almost monotypic stand flanking the preliminary alignment options for the underground generation tie-line dominated by California buckwheat and low-quality habitat along the northern portions of the Project site; each form is detailed below.

The CSS located within SDG&E's property is of generally low- to moderate-quality with an almost monotypic composition of California buckwheat within the shrub layer and a variety of native and non-native herbaceous and forb species making up the matrix of the habitat. Dominant plant species within this form of CSS include California buckwheat, wild oat, foxtail brome, leafy fleabane, and deerweed.

Low-quality areas of this habitat are located along the northern portion of the Project site. These low-quality habitat areas have a higher degree of non-native species as well as scattered eucalyptus trees (*Eucalyptus* sp.). Dominant plant species within the low-quality CSS within the Project site include California buckwheat, wild oat, ripgut brome, foxtail brome, short-pod mustard, dove weed, and slender buckwheat. A total of 13.20 acres of this habitat is located within the Vegetation Survey Area; 0.62 acre of this habitat are located within the Project site development footprint.

3.4.6 Bare Ground

Bare Ground areas are devoid of vegetation. These areas are generally associated with the existing dirt access roads within SDG&E's property as well as the Project-controlled easement on the Project site. A total of 1.85 acres of this habitat is located within the Vegetation Survey Area; 0.18 acre of this habitat are located within the Project site development footprint.

3.4.7 Rock

Areas described as Rock consisted of exposed granitic bedrock with little to no vegetation. These areas are considered separate from Bare Ground as they have different hydrologic and erosional characteristics. Rock areas are limited to the southwestern corner of the Project site. A total of 0.11 acres of this habitat is located within the Vegetation Survey Area; this habitat is not located within the Project site development footprint.

3.4.8 Urban/Developed

Urban/Developed areas within the Project Area and immediately surrounding areas mainly consist of paved roads, residential and business structures, and associated paved surfaces (i.e. pools, sidewalks, outbuildings, etc.). This habitat type includes areas that would be considered Landscape/Ornamental, which area areas that are regularly maintained and/or irrigated for aesthetic purposes. These areas are generally highly modified from the surrounding environment and provide limited value to wildlife and plant species. The majority of the area mapped as Urban/Developed is located east and west of the Project Area but also includes areas along the northeastern boundary of the Project site. A total of 9.22 acres of this habitat is located within the Vegetation Survey Area; 0.05-acre of this habitat are located within the Project site development footprint.

3.4.9 Extensive Agriculture – Row Crops

Areas defined as Extensive Agriculture – Row Crops are those in which food crops or other agricultural products are grown with minimal investment of resources for growing and/or harvesting. Agricultural land to the south and east of the Project site consists of silverleaf mountain gum which is grown for the cut-foliage trade. While the cut flower and foliate trade is generally considered intensive agriculture, this species of Eucalyptus readily naturalizes in the local area and requires limited amounts of irrigation. Extensive Agricultural – Row Crop land is mapped immediately to the south and east of the Project site. A

total of 2.90 acres of this habitat is located within the Vegetation Survey Area; this habitat is not located within the Project site development footprint.

3.5 REFERENCE SITES

Chambers Group biologists conducted a survey in May 2020 to determine the cover by native species, percent covered by weeds, and species composition of reference sites located in existing CSS habitat. Results from the survey at the reference sites were used to determine success criteria for the revegetation program.

3.5.1 Reference Site 1

This reference site is a relatively undisturbed site on SDG&E property located to the north of the Compensatory Mitigation Site (centroid: 33.230450, -117.017681, Figure 2) and is largely dominated by California buckwheat (approximately 40 percent cover), but with a higher proportion of native perennial and annual species than is currently found in the Compensatory Mitigation Site. There is scattered California sagebrush (*Artemisia californica*) throughout the reference site as well (approximately 2 percent). This reference population had a similar shrub density as other areas of CSS in the Project vicinity but did not have chamise (*Adeonostoma fasciculata*) or other sclerophyllous chaparral species present such as bush penstemon (*Keckiella antirrhinoides*) that were present to the northeast of the identified reference site.

The absolute native cover of the CSS reference site was 73 percent, including both annual and perennial shrub species. In addition to California buckwheat, California sagebrush and deerweed (*Acmispon glaber*), common native herbaceous species at the reference site in order of greatest cover included prostrate spineflower (*Chorizanthe procumbens*), golden yarrow (*Eriophyllum confertiflorum*), chia (*Salvia columbariae*), rattlesnake weed (*Daucus pusillus*), yellow pincushion (*Chaenactis glabriuscula*), California everlasting (*Pseudognaphalium californicum*), Spanish clover (*Acmispon americanus* var. *americanus*), hooked navaretia (*Navarretia hamata* subsp. *hamata*), cryptantha (*Cryptantha* sp.), and fringed spineflower (*Chorizanthe fimbriata*). Non-native cover was estimated at 3 percent and comprised of shortpod mustard (*Hirschfeldia incana*), soft chess (*Bromus hordeaceus*) and red brome (*Bromus madritensis* subsp. *rubens*). Bare ground was estimated at 25 percent.

3.5.2 Reference Site 2

A second reference site was sampled in non-native grassland habitat within 500 feet of the Compensatory Mitigation Site. Here, cover was dominated by wild oat (*Avena fatua*), red brome, rat-tail fescue (*Festuca myuros*) and ripgut grass (*Bromus diandrus*), totaling approximately 84 percent non-native cover. The native species component was small and dominated by herbaceous annual species such as western ragweed (*Ambrosia psilostachya*, at 2 percent) and Spanish clover (at 3 percent). Bare ground was estimated at 10 percent.

SECTION 4.0 – IMPLEMENTATION PLAN

4.1.1 Rationale for Expecting Implementation Success

This Plan has been prepared with reasonable expectations based on the status of the Compensatory Mitigation Site and gen-tie line alignment options prior to Project construction activities. Reference populations of successfully restored habitat are present adjacent to the SDG&E parcel and it is evident these restored parcels function as valuable native habitat with moderate- to high-quality CSS vegetation. Soils of the Compensatory Mitigation Site appear suitable to support CSS vegetation. With sufficient weed control and supplementing with native seed, it is reasonable to expect the Compensatory Mitigation Site can be returned to native habitat.

4.1.2 Financial Assurances

Financial assurances will be provided by the Developer/Responsible Party. The Responsible Party is Valley Center ESS, LLC (Developer). A revegetation agreement shall be signed and notarized by the Developer following approval of the Final Revegetation Plan and accompanied by the required security as agreed upon by the County of San Diego.

4.1.3 Schedule

The two construction phases would likely be executed consecutively; Phase 1 followed by Phase 2. However, for the purposes of preparing a worst-case CEQA analysis, technical analyses were completed assuming the two construction phases would occur simultaneously over a period of approximately 6 to 12 months, beginning as early as fourth quarter 2020. The revegetation program within the Compensatory Mitigation Site will be initiated following the completion of Phase 2 once construction activities have been completed. The restoration program within the temporary impact areas along the gen-tie route will be initiated following the completion of the temporary disturbance. It is recommended that seeding take place during the late fall months (i.e., October to December) to take advantage of winter rains and cooler temperatures.

4.1.4 Site Preparation

Construction Material and Equipment

Following the completion of Project construction activities, the Construction Contractor will be responsible for removing construction debris from all work areas. Construction equipment that is not required for final cleanup and seeding will be demobilized.

Compaction and Seedbed Preparation

Soil compaction can decrease infiltration and increase surface runoff, reduce water-holding capacity, and increase the potential seed loss due to wind erosion. Following any necessary recontouring to preconstruction conditions and prior to initiating final grading, the Revegetation Monitor will determine if soil decompaction is necessary by comparing the work area to the pre-construction compaction condition as well as to adjacent non-disturbed areas. If decompaction is required, it will be performed by the Construction Contractor or the Installation Contractor with oversight from the Revegetation Monitor or their designee. Decompaction will be performed with a deep-tillage instrument, the teeth of a backhoe

bucket, a bulldozer ripper, or a similar mechanism. Prior to entering the Project Area, construction equipment used for decompaction will be inspected by the Revegetation Monitor to verify that it is free of soil, mud, or vegetative material to prevent the spread of invasive plant species. The Revegetation Monitor or their designee will inspect the seedbed prior to conducting seeding, as described in Section 4.1.5. Seeding will be performed using a hydroseed truck.

Soil Amendments

The use of soil additives or amendments is not anticipated. No fertilizer will be applied to the seedbed. If interim success criteria are not met after the first two years of the revegetation effort and it is determined that soils are completely void of nutrients or the Compensatory Mitigation Site would benefit from added amendments, application of soil amendments may be employed, if deemed appropriate, by the Revegetation Monitor (See Contingency Measures, Section 8.0).

Access

Access to the Project site will be accomplished by entering from Valley Center Road via a permanent Project-controlled easement. The Project site access roads will comply with County regulations and be stabilized using gravel in order to provide temporary access for the hydroseed truck and permanent access for maintenance, fire department, and emergency vehicle access to the facility after construction. A series of existing dirt access roads within SDG&E's property will be used for the hydroseed truck when travelling throughout SDG&E's property to access the Project Area.

Protection of Existing Resources

All construction equipment will be limited to existing and pre-defined access roads and active construction areas (e.g., staging, laydown, parking areas). Construction personnel and equipment will not be permitted outside the pre-defined work areas to ensure existing native vegetation is not trampled. Access will also not be permitted into adjacent habitat by implementing a physical barrier such as snow fencing or stakes.

Following construction, Project site equipment and facilities (with the exception of stormwater drainage and retention basins) will be surrounded by a solid, 8-foot tall vinyl fence or a similar solid fence. Existing chain-link fences surrounding the Project site boundary will remain.

Once the revegetation effort is underway, the seeded areas will be marked with temporary staking to minimize disturbance. Temporary signs will also be installed that identify the area as a protected area that read something to the effect of:

Habitat Restoration in Progress
Unauthorized Access Prohibited

4.1.5 Planting Plan

All previously undisturbed, temporary work areas that are not subject to long-term use or ongoing revegetation maintenance (e.g., Diegan Coastal Sage Scrub, Non-Native Grassland, up to approximately 1.39 acres, depending on the gen-tie alignment option selected) will be restored with native species that are characteristic of the adjacent native vegetation communities. Temporary impact areas will be seeded,

but no soil additives or amendments will be applied to the seeded areas initially. If seed loss due to granivory, desiccation, or other causes occurs, reseeding will be prescribed by the Revegetation Monitor, as appropriate, to support achievement of success criteria.

Similarly, the Compensatory Mitigation Site will be enhanced with native species that are characteristic of the adjacent native vegetation communities. The Compensatory Mitigation Site will be seeded, but no soil additives or amendments will be applied to the seeded areas initially. If seed loss due to granivory, desiccation, or other causes occurs, reseeding will be prescribed by the Revegetation Monitor, as appropriate, to support achievement of success criteria.

The seed mix prescribed in Table 4 depicts the mix for the Conceptual Mitigation Site and restoration of the temporary impacts associated with gen-tie line construction. As described below, precise locations of seed mix applications will be refined based on the actual temporary impacts, field verification of conditions after Project construction, and seed availability and quality once all seed is collected, cleaned, and tested. The seed mix, purity, germination percentage, and rates[1] may be modified by the Revegetation Monitor to achieve the objectives described in this Plan. All species selected for these efforts have been known to germinate readily with no scarification or stratification requirements.

Table 5: Seed Mix

Scientific Name	Common Name	Seeding Rate (Bulk Pounds per Acre) [1, 2]	Percent Pure Live Seed [3]
Acmispon glaber	deerweed	5.0 *	90/60
Amsinckia intermedia	rancher's fiddleneck	1.5	45/65
Artemisia californica	California sagebrush	3.0 *	15/50
Chaenactis glabriuscula	yellow pincushion	3.5	15/55
Corethrogyne filaginifolia	California sand-aster	0.5	93/86
Deinandra fasciculata	fascicled tarweed	2.0	10/25
Diplacus puniceus	coast monkey flower	2.0	5/70
Encelia californica	California encelia	1.0	40/60
Eriogonum fasciculatum	California buckwheat	10.0 *	10/65
Eriophyllum confertiflorum	golden yarrow	1.0	30/60
Isocoma menziesii	coast goldenbush	3.0	20/40
Pseudognaphalium californicum	California everlasting	0.5 *	10/25
Stipa pulchra (deawned)	purple needle grass	4.0	70/60
Festuca microstachys	Gray's fescue	3.0	90/80
Total		**40.0**	**TBD**

[1] Germination testing will be conducted by the seed supplier to determine pure live seed quantities and consequent application rates.

[1] Seed species for hydroseeding will be of local genetic stock to the extent feasible collected from the Project Area or immediately adjacent areas or from within the same watershed (San Luis Rey) as the Project Area as close to the Keys Canyon Creek area as possible.
[2] At the discretion of the Revegetation Monitor, the final seed mixes may be refined to include at least 8 to 10 native species and a minimum of 25 pounds of pure live seed per acre based on specific vegetation characteristics of the impact area, availability of seed from appropriate sources, and the results of the germination/purity testing. Species with an asterisk (*) are required.
[3] Percent Purity / Percent Germination. To calculate Percent Pure Live Seed (PLS) = (percent germination X percent purity) / 100.

Seed Source

Seed species for hydroseeding will be of local genetic stock to the extent feasible collected from the Project Area or from within the same watershed (San Luis Rey) as the Project Area as close to the Keys Canyon Creek area as possible. Seed must be clearly labeled with the supplier's name, collection information, and the tested purity and germination percentages. The Revegetation Monitor will inspect the seed prior to application.

Hydroseeding Application

Hydroseeding application would be applied to both the restoration of temporary impacts from construction of gen-tie line and the enhancement of the Compensatory Mitigation Site. To improve moisture and nutrient holding capacity, and to improve conditions for root growth, organic soil amendments will be added to the soil. Organic matter provides a source of nutrients and is beneficial for improving soil structure and soil quality for long-term plant growth. In addition, granular mycorrhizal inoculum would be utilized to increase the efficient use of soil nutrient resources and aid in weed suppression, thereby greatly increasing the performance.

- *Application of Organic Matter:* Approximately 800 pounds per acre of wood fiber will be applied through hydroseeding.

- *Application of Mycorrhizal Fungi:* Endomycorrhizal inoculum will be applied in the same application as the seeds. In no case will endomycorrhizal inoculum be applied after the seeds. Inoculum must be applied with hydroseeding equipment within one hour of addition to the mixing tank. Endomycorrhizal inoculum is a live material. It will be stored, transported, and applied at temperatures of less than 90 degrees Fahrenheit (32°C). If temperatures will exceed 90 degrees Fahrenheit, the inoculum must be covered or incorporated within three hours of its application. Inoculum will be applied at the rate of 21,983,000 live propagules per acre, based on the guarantee of the supplier or the analysis returned by an independent laboratory. This is usually approximately 60 pounds of inoculum per acre, but brands may vary.

Hydroseeding will consist of applying the specified seed mix along with an application of wood fiber mulch and an organic soil stabilizer or soil binder. Fertilizer, which favors the establishment of non-native weedy species, shall not be added to the mix. The materials to be applied during the hydroseed operation are shown in Table 5.

Table 6: Soil Amendments to be applied during Hydroseeding

Soil Amendment	Amount to Add
Mycorrhizal Inoculum	60 lbs per acre
Virgin Cellulose Wood Fiber Mulch	800 lbs per acre, maximum
Seed Mix	see Table 4
Organic Soil Stabilizer (e.g., Ecology Controls M-Binder, ConTack, or approved equal)	100 lbs per acre

Broadcast Seeding

Alternatively, seed may be hand broadcast using a seed grinder type applicator. Following application, it is recommended that seed be raked in to a depth of 1 inch to ensure good soil contact and reduce the potential for seed loss due to granivory.

4.1.6 Season of Planting

Installation of plant material must occur between October and March to take advantage of winter rains and cooler temperatures to promote successful plant establishment.

4.1.7 Irrigation

No irrigation systems will be installed as part of the Project. Neither the restored areas within the temporary impact areas along the selected gen-tie alignment option nor the Compensatory Mitigation Site are planned for watering. However, those areas may be watered during abnormally dry conditions or periods of drought in support of achievement of success criteria, as recommended by the Revegetation Monitor, Revegetation Maintenance Contractor, or their designee. Watering will be limited to only those areas where restoration or enhancement has occurred and would be applied in a manner that avoids runoff into non-target areas.

SECTION 5.0 – COMPENSATORY MITIGATION SITE MAINTENANCE DURING MONITORING

As restoration of temporary disturbance due to gen-tie line construction will be reseeded, and with the seed mix described above, the restored habitat is expected to increase the biological function and value of the habitat following completion of the restoration effort such that maintenance is not required. As such, the maintenance activities described in this section apply to the Compensatory Mitigation site only.

5.1 MAINTENANCE ACTIVITIES

After seeding is complete, revegetation maintenance visits will occur eight times during Year 1, followed by six times during Years 2 and 3, and four times per year in Years 4 and 5 within the Compensatory Mitigation Site. Additional revegetation maintenance visits may also be conducted throughout the year by the Revegetation Maintenance Contractor, as needed or if recommended by the Revegetation Monitor. Each revegetation maintenance visit may include multiple days and use of multiple crewmembers to adequately perform all necessary tasks. As recommended by the Revegetation Monitor, revegetation maintenance activities will include weed treatment, erosion control, remedial seeding, and any other requirements needed to achieve success. As no irrigation systems will be installed as part of the Project, irrigation maintenance is not anticipated. Should installation of a temporary irrigation system become necessary in the future to achieve the success criteria, the Revegetation Monitor will make a recommendation to the Revegetation Maintenance Contractor and any subsequent irrigation maintenance will follow.

5.1.1 Proposed Weeding Program

Weed control will occur as needed and will continue throughout the revegetation monitoring period. The Revegetation Monitor will monitor the weeding events within the Compensatory Mitigation Site and provide recommendations for additional weed control if necessary. Weed control will be performed prior to and during peak growing times when weeds are most active (i.e., spring months). Weeding should be performed in a manner that limits seed production of undesirable species. Any non-native plants that are allowed to develop viable seed must be removed from the Compensatory Mitigation Site and disposed of at an appropriate refuse facility. Herbicide application will occur under the direction of a professional applicator with an Agricultural Pest Control Adviser License or a Qualified Applicator License.

5.1.2 Proposed Pruning Program

Pruning is not currently proposed as part of this Plan nor is anticipated; however, it is not otherwise restricted. For example, pruning of some existing native plants may be necessary to allow establishment of young plants between them. The use of pruning will be at the discretion of the Revegetation Monitor, but is not likely to occur during the revegetation monitoring period.

5.1.3 Proposed Trash Removal Program

As necessary, trash will be removed by hand from the Compensatory Mitigation Site. This includes trash accumulated during any maintenance activities or trash blown in by wind or human action. Trash will be legally disposed of offsite. If any herbivore exclusionary devices or a temporary irrigation were installed as part of the revegetation effort, they will be removed and all components disposed of at an offsite facility following the successful completion of the success criteria.

5.1.4 Proposed Pest Control Program

At this time, herbivore exclusion cages or fencing is not anticipated. Should herbivory become a problem, the Revegetation Monitor may recommend installation of exclusionary devices to protect the native plants and aid in achievement of the success criteria.

SECTION 6.0 – COMPENSATORY MITIGATION SITE MONITORING PLAN

As restoration of temporary disturbance due to gen-tie line construction will be reseeded, and with the seed mix described above, the restored habitat is expected to increase the biological function and value of the habitat following completion of the restoration effort such that a monitoring plan is not required. As such, the monitoring activities described in this section apply to the Compensatory Mitigation site only.

6.1 PERFORMANCE STANDARDS

A monitoring program will be implemented to appraise the Project for compliance with the goals and performance standards required by CEQA and set forth by the resource agencies. Reports will be based on their specific monitoring and reporting requirements as described below. The monitoring period will begin with implementation of the revegetation effort and will continue for five years. The monitoring program will be conducted by a qualified Revegetation Monitor as outlined herein.

6.1.1 Success Criteria

Success criteria have been determined based on reasonable considerations due to the condition of the Compensatory Mitigation Site prior to Project implementation (Table 6). Achievement of these success criteria will be based on the native and non-native plant cover and species richness identified during the pre-construction condition surveys and the observations made at the reference sites (see Figure 2 for reference site locations).

- Absolute percent cover (native vegetative cover) shall not deviate more than 10 percent from the reference site cover condition.
- Species composition (i.e., species richness) shall not deviate more than 10 percent from the reference site condition and must contain at a minimum, the four required indicator species identified in Table 4 that were present in the reference site. Additional species will be determined at the discretion of the Revegetation Monitor based on specific vegetation characteristics of the impact area, availability of seed from appropriate sources, and the results of the germination/purity testing. It is expected that at least 8 to 10 native species will be seeded throughout the Compensatory Mitigation Site. The final seed mix applied to the Compensatory Mitigation Site will be documented in the first annual report.
- Evidence of natural recruitment must be documented at the end of the revegetation monitoring period to indicate the Compensatory Mitigation Site is self-sustaining.

Table 7: Success Criteria by Year

Year	Reference Cover Value of Native Species (%)	Target Cover Value of Native Species (%)*	Maximum Cover of Non-Native Species (%)	Species Richness**	Evidence of Natural Recruitment
1	15	13	25	4	N/A
2	25	22	15	5	N/A
3	45	39	10	6	Yes
4	60	50	10	7	Yes
5	73	63	10	8	Yes

* Target cover value is based on 85 percent of original reference values determined during a qualitative analysis of a nearby (within 500 feet) reference site location in May 2020, per County recommendations. Target values represent absolute cover and include annual and perennial species.

** Species richness is determined by how many native species installed per the seed mix contained in Table 4 that have become established within the Compensatory Mitigation Site.

6.1.2 Adaptive Management and Remedial Actions

Remedial actions are employed to address the Compensatory Mitigation Site if it is failing to achieve one or more interim success criteria with the intent of progressing the Compensatory Mitigation Site toward meeting all the final success criteria. If the Compensatory Mitigation Site fails to meet the established success criteria by the end of the five-year monitoring period, negotiations with the County and resource agencies may be necessary and concerns will be addressed at that time. Below is a list of potential adaptive management remedial actions that could be employed if the Compensatory Mitigation Site does not achieve the interim success criteria (Table 6), if deemed appropriate and feasible by the Revegetation Monitor:

- supplemental re-seeding
- installation of container plants and temporary irrigation
- soil decompaction or erosion control such as native plant mulch, weed-free straw mulch, natural fiber (biodegradable) erosion control matting (e.g., jute netting or approved equal), and/or weed-free straw wattles
- application of soil amendments such as lime, gypsum, phosphorous, etc. All amendments applied to the revegetation site will be nontoxic to native organisms and will decay into harmless byproducts within one year of application.
- installation of herbivore-exclusion cages/fencing
- additional weed abatement measures
- other adaptive management measures determined by the Revegetation Monitor

6.1.3 Target Functions and Values

The primary target functions of the revegetation program are to increase native plant cover and diversity to provide foraging, nesting, and habitat linkage corridors for native wildlife. The Compensatory Mitigation Site must be self-sustaining with little to no human input at the conclusion of the program. Due

to the current low-quality of the existing habitat on the Project site, it is expected that the habitat value of the Compensatory Mitigation Site at the completion of the revegetation program will be greater than the current pre-construction value of the Project site. Native plant species selected for the seed mix are those either present on the Project site, observed within the reference sites, or are known to occur in the vicinity of the Project Area. These species collectively are indicative of Diegan Coastal Sage Scrub: Inland Form and have been known to support native wildlife, including the federally threatened coastal California gnatcatcher. Weed abatement activities and seeding of native species coupled with active monitoring and an adaptive management program for five years are expected to greatly improve the overall habitat function and value of the Compensatory Mitigation Site.

6.1.4 Target Acreage

At the completion of the revegetation monitoring period, the target size for the habitat will be 1.64 acres of enhanced Diegan Coastal Sage Scrub: Inland Form. The Compensatory Mitigation Site is larger than the 0.62 acres of direct impacts to ensure that the enhancement of existing low quality habitat provides an increase in biological function. This represents more than a 1:1 mitigation ratio with no temporal loss due to the current low-quality status of the Project site prior to construction.

6.2 MONITORING REQUIREMENTS

6.2.1 Monitoring Methods

Qualitative Maintenance Monitoring Methods

After Project construction and initial seeding have been completed, the Revegetation Monitor will monitor Project-wide restoration efforts. The Compensatory Mitigation Site will be monitored qualitatively six times in Year 1, four times per year in Years 2 and 3, and two times per year in Years 4 and 5. This monitoring will focus on identifying the progress of native plant development in the Compensatory Mitigation Site, developing appropriate revegetation maintenance activities, and verifying that the recommended revegetation maintenance activities have been conducted. The Revegetation Monitor will identify any potential problems associated with non-native species, herbivory, drought stress, potential erosion problems, disease or pest infestations, and make recommendations for revegetation maintenance actions to address issues observed. New, existing, or potential erosion issues will be identified for repair in a timely manner prior to rain events, and addressed as recommended by the Revegetation Monitor. If non-native plants are found during the revegetation monitoring period, they shall be removed as necessary to support meeting the cover and species richness success criteria.

Quantitative Performance Monitoring Methods

Quantitative monitoring for performance in relation to the success criteria will occur once annually in the spring of each year during the revegetation monitoring period or until success criteria are achieved, whichever comes first. Pertinent information will be collected through direct observation during an annual revegetation maintenance site visit, including data on native and non-native plant cover, species composition, and restored physical conditions. Performance monitoring will include the following:

- documenting the percent cover of native and non-native vegetation within the Compensatory Mitigation Site using 25-meter point-intercept transects following the protocols outlined in by the California Native Plant Society (Sawyer and Keeler-Wolf 1995) or another approved sampling

method. The quantity and location of each transect will be determined in the field by the Revegetation Monitor. All native and non-native species encountered at 0.5-meter intervals along the permanent transect line will be recorded.

- comparing the Compensatory Mitigation Site to the target success criteria derived from the reference location
- documenting all plant species within the Compensatory Mitigation Site to measure species richness
- noting evidence of natural recruitment per species
- conducting photographic documentation of the Compensatory Mitigation Site at permanent photograph points established during construction

Quantitative performance monitoring data will be collected either on standardized datasheets or via handheld electronic devices (e.g., smartphones and/or tablets). Global Positioning System (GPS) coordinates will be recorded for the photo location stations during the pre-construction assessments. Photographs for the Compensatory Mitigation Site will be included in the annual quantitative monitoring report. Locations and compass direction for each transect will also be recorded.

6.2.2 Monitoring Schedule

Monitoring will be conducted during each calendar year. Qualitative monitoring will occur bi-monthly during Year 1 as seed germination is expected to be slow; quarterly for Years 2 and 3; and semi-annually for Years 4 and 5. Quarterly visits for qualitative monitoring will occur in March, June, September, and December of each monitoring year. Quantitative monitoring and photo-documentation will occur once in either March, April or May, depending on weather patterns that year.

6.2.3 Monitoring Reports

The Revegetation Monitor will prepare monitoring reports that will include a qualitative or quantitative analysis of the vegetation on the Compensatory Mitigation Site. Qualitative reports will consist of a short worksheet in tabular form tracking progress and identifying any revegetation maintenance needs. Qualitative reports will be submitted to the Developer and the Revegetation Maintenance Contractor within one week of each monitoring visit so that any corrective measures may be addressed in a timely manner.

Quantitative monitoring reports will quantify the vegetative cover and species richness on the Compensatory Mitigation Site and document the presence of any natural recruitment. These quantitative annual reports will be submitted to the Developer, the resource agencies and the County no later than the first week of January. Each annual report will include the following:

- project background
- revegetation maintenance and monitoring methods
- revegetation maintenance activities conducted including any remedial actions taken during the year
- representative photographs from fixed locations
- maps depicting locations of photo points and transect locations
- summary of qualitative monitoring results for the year
- quantitative performance monitoring results
- discussion of the revegetation program's performance in relation to success criteria

- a conclusion and recommendations for remedial measures, if needed

Monitoring and revegetation maintenance field data will be included as an appendix to each report. The performance monitoring reports will be submitted to the County as follows:

- Year 1: Year-End Report
- Year 2: Annual Report
- Year 3: Annual Report
- Year 4: Annual Report
- Year 5: Annual Report

Any significant issue or contingency that arises on the Compensatory Mitigation Site (e.g., plant survival issues, fire, or flooding) shall be reported in writing to the resource agencies and the County of San Diego within two weeks from the date of the incident. Accompanying the report shall be a plan for remediation, with an implementation schedule and a monitoring schedule.

SECTION 7.0 – COMPLETION OF COMPENSATORY MITIGATION

The Developer or their consultant will notify the resource agencies and the County in writing that the success criteria have been met and the mitigation requirements have been fulfilled. The Compensatory Mitigation Site must show signs of self-sustainability and must have been off any supplemental irrigation for at least two years prior to final approval with no new planting or reseeding having occurred during this time. The restored area along the selected gen-tie alignment option will be functioning as a moderate- to high-quality native habitat at the conclusion of the revegetation monitoring period. Should any new construction or additional encroachment into the habitat occur, subsequent mitigation and monitoring will be required. The Developer will be responsible for the long-term management of the Compensatory Mitigation Site. Should any future development within the Compensatory Mitigation Site directly impact CSS, mitigation for that impact would be required at a ratio representative of the higher quality habitat that the revegetation and enhancement has provided.

SECTION 8.0 – CONTINGENCY MEASURES FOR COMPENSATORY MITIGATION

8.1 INITIATING CONTINGENCY PROCEDURES

If the interim success criteria are not met for a given year, or if the Compensatory Mitigation Site fails to meet the final goals of the revegetation effort at the end of the revegetation monitoring period, the Developer will describe the circumstances necessitating the initiation of contingency measures and will be responsible for proposing all remedial actions. Any contingency measures necessary for achievement of the success criteria or deviations from those prescribed in this Plan must be approved by the County and the resource agencies. Compensatory Mitigation Site maintenance and monitoring will continue until final approvals are received from the County.

8.2 ALTERNATIVE LOCATIONS FOR CONTINGENCY COMPENSATORY MITIGATION

Alternative locations for contingency mitigation have not been currently identified. Alternative locations will be considered in the future should the Compensatory Mitigation Site fail to meet the success criteria after five years. Off-site locations in the vicinity of the Project area or payment into an approved mitigation bank may be considered if the Compensatory Mitigation Site is considered inappropriate.

8.3 FUNDING

The Developer will be responsible for funding any contingency measures.

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APPENDIX A – BIOLOGY REPORT (CHAMBERS GROUP 2020)

Valley Center Storage Project
Biological Resources Letter Report
San Diego County, CA

Project Number: PDS2020-STP-20-011

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June 2020

TABLE OF CONTENTS

Page

SECTION 1.0 – SUMMARY

This Biological Resources Letter Report has been completed to determine the potential for impacts to biological resources associated with construction of the proposed Valley Center Storage Project (Project). The Project is located on an 8.93-acre parcel in the unincorporated community of Valley Center, San Diego County, California. The Project will interconnect to the existing, adjacent San Diego Gas & Electric (SDG&E) 69kV Valley Center Substation via an approximately 0.3-mile underground generation tie-line. For the purposes of this Letter Report, Project site is defined as the 8.93-acre parcel and the Project-controlled access easement (see Attachment A, Figure 1). The Project site with the offsite underground generation tie-line alignment is referred to as the Project Area. Construction of the Project is anticipated to begin in 2020 with commencement of Project operations in 2021.

Chambers Group biologists Clark Austin and Erik Olmos conducted a general reconnaissance survey for the Project to identify the potential for occurrence of sensitive species, vegetation communities, and habitats present within the Project Area that could support sensitive wildlife species. A 100-foot buffer was added to all Project features to accommodate avian nests and/or nesting activity buffers for special status species that may nest in the area. The general reconnaissance survey was conducted on foot throughout the Project Area on November 19, 2019.

A nesting bird and focused plant survey was conducted on March 31, 2020 by Chambers Group biologist Natalie Borchardt to identify any nesting birds or nesting activity within the Project site in preparation for geotechnical boring activities associated with the Project. In addition, as the survey was conducted within the blooming period of the following rare plants: Robinson's peppergrass (*Lipidium virginicum* var. *robinsonii*), Payson's jewelflower (*Caulanthus simulans*), and western dichondra (*Dichondra occidentalis*); the survey also included observation of any occurrence of these rare plant species. Protocol coastal California gnatcatcher (*Polioptila californica*; CAGN) surveys were conducted on May 25, June 2, and June 9, 2020. All three protocol surveys were negative for the presence of CAGN.

Combined results from the surveys documented bare ground, three vegetation communities, and one special status wildlife species within the Project Area. No active avian nests or nesting activity was found within or adjacent to the Project Area. No rare plants were observed during the surveys. Additionally, no jurisdictional features were observed within the Project Area. The Project does not have the potential to result in impacts to jurisdictional features and therefore, Section 404 and 401 permits are not required. The Project would permanently impact low-quality Diegan Coastal Sage Scrub (CSS, which is a Tier II vegetation community under the County's Biological Mitigation Ordinance (BMO)). In accordance with the Habitat Loss Permit (HLP) Ordinance, the County has the ability to issue an HLP for the conversion of CSS. An HLP will be required for the Project prior to the issuance of a grading permit. In order to issue an HLP, the County must have a Planning Agreement executed with United States Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW). If the County is unable to issue an HLP, the Project will obtain written concurrence from USFWS and CDFW that take of CAGN is not reasonably certain to occur.

SECTION 2.0 – INTRODUCTION, PROJECT DESCRIPTION, LOCATION, SETTING

2.1 INTRODUCTION

Chambers Group was retained by Valley Center ESS, LLC (Developer) to conduct a literature review, jurisdictional waters evaluation, reconnaissance-level survey, and nesting bird and focused plant survey for the Valley Center Storage Project (Project); a proposed battery energy storage facility and associated underground generation tie-line in Valley Center, California. This Letter Report presents the results and professional recommendations regarding the treatment of sensitive biological resources in the Project Area. Information contained in this document is in accordance with accepted scientific and technical standards that are consistent with the requirements of United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW).

2.2 PROJECT DESCRIPTION

The Developer plans to construct, own and operate the Valley Center Storage Project, a lithium-ion based battery energy storage facility capable of delivering up to 140MW for approximately four hours on an 8.93-acre parcel in Valley Center, San Diego County. The Project includes an approximately 0.3-mile underground generation tie-line that, upon leaving the Project site, would cross Valley Center Road heading north onto San Diego Gas & Electric (SDG&E) property to interconnect to the existing, adjacent 69kV SDG&E Valley Center Substation. Access to the Project site is provided from Valley Center Road via a permanent Project-controlled easement.

The Project will be comprised of battery modules housed within up to 58 sets of four non-walk-in enclosures. The size and quantity of each battery storage container will ultimately vary depending on the battery and battery energy storage system manufacturer(s) selected for the Project. However, containers currently under consideration are approximately 31.6 feet long by 5.7 feet wide by 8.6 feet high. The batteries will be charged from the CAISO (California Independent System Operator) grid via the Project's interconnection to the SDG&E Valley Center Substation. Energy stored in the Project will then be discharged back into the grid when the energy is needed, providing essential electricity reliability services to the local area.

2.3 PROJECT LOCATION AND SETTING

The Project is located within unincorporated Valley Center in northern San Diego County. The Project site is located south of Valley Center Road and east of Cole Grade Road, within the United States Geological Survey (USGS) Valley Center, California, 7.5-minute topographical quadrangle. The Project site primarily consists of disturbed land that was previously used as farmland and has been extensively graded and leveled. Small areas of low-quality Diegan Coastal Sage Scrub: Interior form (CSS) habitat and exposed bedrock are also located within the Project site, primarily along the northern portion of the Project site. The Project site is surrounded by multiple Silverleaf mountain gum (*Eucalyptus pulverulenta*) groves used for the cut flower trade to the east and south, commercial and residential properties located on industrial-zoned parcels to the west and north, as well as bordered by Valley Center Road to the north.

Four alignment options are being considered and were evaluated for the gen-tie line (Figure 1). All four options leave the Project site access easement, cross under Valley Center Road and then:

- Option A: enters SDG&E's property and heads north, adjacent to existing SDG&E underground circuits within SDG&E's property and enters the substation at the point of interconnect.
- Option B: enters SDG&E's property following Option A, but travels across the property in a northwesterly direction until reaching the substation.
- Option C: follows the southern and western property boundaries within SDG&E's property until turning easterly to access the substation from the west.
- Option D: follows the west-bound Valley Center Road right-of-way before entering SDG&E's property, following Option C in the easterly direction to access the substation.

To varying degrees, the alignment options are located within or adjacent to bare ground, non-native grassland, and CSS of varying quality. These vegetative communities would be temporarily impacted during installation of the gen-tie line (see Figure 3). Regardless of the alignment ultimately selected, temporary impacts would be restored to pre-Project conditions. Installation of Project facilities on the Project site (Project site Development Footprint) would result in permanent impacts. A Conceptual Revegetation Plan has been prepared to provide a description of the revegetation that would occur should the mitigation requirements for permanent impacts be satisfied through the revegetation and enhancement of habitat located on the Project site. If the Project elects to satisfy mitigation requirements through the revegetation and enhancement of habitat located on the Project site, a Final Revegetation Plan may be required as a condition of the project, to be completed at a later date (i.e. prior to grading).

Table 1: Estimates of Project Disturbance to Vegetation Communities within each Gen-tie Alignment Option

Vegetation Communities	Estimated Disturbance (acres)
Option A	
Bare Ground	0.66
Diegan Coastal Sage Scrub: Interior Form	0.14
Disturbed	0.09
Non-Native Grassland	0.41
Urban/Developed	0.09
Option A Totals	**1.39**
Option B	
Bare Ground	0.10
Diegan Coastal Sage Scrub: Interior Form	0.03
Disturbed	0.01
Non-Native Grassland	0.43
Urban/Developed	0.03
Option B Totals	**0.60**
Option C	
Bare Ground	0.03
Diegan Coastal Sage Scrub: Interior Form	0.43
Disturbed	0.11
Non-Native Grassland	0.19

Urban/Developed	0.58
Option C Totals	**1.34**
Option D	
Bare Ground	0.01
Diegan Coastal Sage Scrub: Interior Form	0.09
Disturbed	0.10
Non-Native Grassland	0.07
Urban/Developed	1.07
Option D Totals	**1.34**

The Project Area is surrounded by industrial/commercial areas of unincorporated Valley Center, including several storage facilities, propane gas distributors, and the adjacent SDG&E Valley Center Substation. Project Area elevations range from approximately 1,350 to 1,420 feet above mean sea level (amsl). A Project Location and Vicinity Map is provided in Attachment A, Figure 1.

The Project Area is located within the boundaries of the County's Draft North County MSCP (NCMSCP) Subarea Plan; however, is outside the Pre-approved Mitigation Area (PAMA) (County 2009).

SECTION 3.0 – BIOLOGICAL RESOURCES EVALUATION

3.1 METHODS

Chambers Group conducted a literature review, jurisdictional waters evaluation, reconnaissance-level survey, and nesting bird and focused plant survey for the Project. The methods used by Chambers Group are outlined below. The following geographies were evaluated:

- Reconnaissance-Level Survey Area: 500-ft buffer around the Project site and a 100-ft buffer around the entirety of SDG&E's property as shown on Figure 1
- Literature search for special status species occurrences: 5-mile buffer around the Project Area (Figure 2)
- Vegetation Mapping (Vegetation Survey Area): 100-foot buffer around the Project Area as shown on Figure 3
- Nesting Bird and Focused Plant Survey: Project site as shown on Figure 1

3.1.1 Literature Review

Prior to performing the reconnaissance-level survey, existing documentation relevant to the Project Area was reviewed. The most recent records of the California Natural Diversity Database (CNDDB) managed by the CDFW (CDFW 2019), the USFWS database – Carlsbad office (USFWS 2019), the National Wetlands Inventory (NWI) (USFWS 2019), and the California Native Plant Society's Electronic Inventory (CNPSEI) of Rare and Endangered Vascular Plants of California (CNPS 2019) were reviewed for the following quadrangles containing and surrounding the Project Area: Valley Center, Pala, Boucher Hill, and Rodriguez Mountain, California USGS 7.5 minute quadrangles. These databases contain records of reported occurrences of federal- and state-listed endangered or threatened species, proposed endangered or threatened species, California Species of Special Concern (SSC), or otherwise sensitive species or habitats that may occur within or in the immediate vicinity of the Project Area.

3.1.2 Jurisdictional Waters

An assessment of jurisdictional waters regulated by the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and CDFW was conducted to determine the potential of jurisdictional waters to be found within the Project Area. Pursuant to Section 404 of the Clean Water Act, USACE regulates the discharge of dredged and/or fill material into waters of the United States. The State of California (State) regulates discharge of material into waters of the State pursuant to Section 401 of the Clean Water Act and the California Porter-Cologne Water Quality Control Act (California Water Code, Division 7, §13000 et seq.). Pursuant to Division 2, Chapter 6, Sections 1600-1602 of the California Fish and Game Code, CDFW regulates all diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake, which supports fish or wildlife. A preliminary assessment was conducted via desktop analysis through the USGS National Hydrography Dataset for hydrological connectivity and subsequently verified during the field survey.

3.1.3 Biological Reconnaissance-Level Survey

Chambers Group biologists, Clark Austin and Erik Olmos, conducted a reconnaissance-level survey within the Project Area to identify the potential for occurrence of sensitive species, vegetation communities, and habitats that could support sensitive wildlife species. An additional 500-foot buffer was added to the

Project site and 100-foot buffer on the entirety of the SDG&E property boundary to accommodate avian nests and/or nesting activity buffers for federally listed species that may nest in the area. See Figure 1 for the Survey Area covered during the reconnaissance-level survey. The survey was conducted on foot throughout the Survey Area between 1230 and 1445 hours on November 19, 2019. All plant species and vegetation communities observed within the Project Area were recorded.

Weather conditions during the survey included temperatures ranging from 73 to 63 degrees Fahrenheit, with one hundred percent cloud cover, and light precipitation developing toward the end of the survey. Photographs of the Project Area were recorded to document existing conditions (Attachment B).

Vegetation Mapping

As stated above, all plant species and vegetation communities observed within the Project Area during the general reconnaissance survey were recorded. A 100-foot buffer was added to the Project site and SDG&E property boundary (Vegetation Survey Area) and vegetation communities within this additional buffer were mapped. Vegetation communities within the Vegetation Survey Area have been identified, qualitatively described, and mapped onto an aerial photograph. The vegetation communities are described following the County of San Diego Biological Guidelines and are based on Preliminary Descriptions of the Terrestrial Natural Communities of California (Holland 1986) and associated amendments. Plant nomenclature follows that of The Jepson Manual, Second Edition (Baldwin et al. 2012).

Wildlife

All wildlife and wildlife signs observed and/or detected, including tracks, scat, carcasses, burrows, excavations, and vocalizations during both surveys were recorded. Additional survey time was spent in those habitats most likely to be utilized by wildlife (trees were surveyed with binoculars for bird nests, etc.) or in habitats with the potential to support state- and/or federal-listed or otherwise sensitive species. Notes were made on the general habitat types, species observed, and the conditions of the Project Area.

3.1.4 Nesting Bird and Focused Plant Survey

A nesting bird and focused plant survey was conducted by Chambers Group biologist Natalie Borchardt on the Project site to identify any nesting birds or nesting activity and also record occurrences of any of the below identified rare plants in preparation for geotechnical boring activities. The survey was conducted between the hours of 1200 and 1400 on March 31, 2020 and within the blooming period of the following rare plants: Robinson's peppergrass (*Lipidium virginicum* var. *robinsonii*), Payson's jewelflower (*Caulanthus simulans*), and western dichondra (*Dichondra occidentalis*).

Weather conditions during the survey included temperatures ranging from 76 to 80 degrees Fahrenheit, wind speeds ranging from one to three miles per hour, one hundred percent cloud cover, and no precipitation.

3.1.5 CAGN Protocol Surveys

Focused surveys for CAGN are being conducted within the Project Area and a 500-foot survey buffer to confirm that the habitat is not occupied. Permitted biologists with 10(a)(1)(A) species recovery-permitted have conducted three rounds of six surveys within suitable CAGN habitat in accordance with the 1997

USFWS protocol, Coastal California Gnatcatcher (Polioptila californica californica) Presence/Absence Survey Guidelines. Under the framework of the HLP, three surveys are required to document and assess presence or absence of CAGN. No CAGN were identified during the first three surveys. While a Planning Agreement between the County, USFWS, and CDFW is in process, because it is possible that an HLP cannot be issued by the County due to the current absence of a Planning Agreement, an additional three surveys (for a total of six surveys) will be conducted. Conducting six surveys is consistent with the USFWS protocol to operate outside of the HLP framework. If a Planning Agreement is executed before the completion of surveys 4 to 6, no further surveys will be performed.

3.2 HABITATS / VEGETATION COMMUNITIES

Four vegetation communities in addition to Bare Ground (13000), Rock, and Urban/Developed (12000) were mapped within the Survey Area: Disturbed Habitat (11300), Non-Native Grassland (42200), and CSS (32520), and Extensive Agriculture – Row Crops (18320). Photographs of the vegetation in the Project Area can be found in Attachment B, and mapped vegetation communities within the Vegetation Survey Area are depicted in Attachment A, Figure 3.

3.2.1 Disturbed Habitat

Areas classified as Disturbed Habitat tend to be dominated by pioneering herbaceous species that readily colonize disturbed ground and that are typically found in temporary, often frequently disturbed habitats (Barbour et al. 1999), and that have a high percentage of non-native weedy species (i.e., greater than 25 percent of the species cover). The soils in Ruderal/Disturbed areas are typically characterized as heavily compacted or frequently disturbed. The vegetation in these areas is adapted to living in compact soils where water does not readily penetrate the soil. This habitat is found in a variety of locations within the Project Area; however, it is most frequently associated with areas along access roads located within the Project Area.

Dominant plant species identified within the Ruderal/Disturbed portions within the Project Area include: short-pod mustard (*Hirschfeldia incana*), deerweed (*Acmispon glaber*), leafy fleabane (*Erigeron foliosus* var. *foliosus*), hooked navarretia (*Navarretia hamata* ssp. *hamata*), dove weed (*Croton setigerus*), and foxtail brome (*Bromus madritensis*). A total of 9.59 acres of this habitat is located within the Vegetation Survey Area (which encompasses the Project Area); 5.79 acres of this habitat are located within the Project site development footprint.

3.2.2 Non-Native Grassland

This grassland habitat is dominated by a variety of non-native grass species dominated by species in the *Bromus* and *Avena* genera; this habitat is found in a variety of locations throughout the Project Area. This community is generally of low ecological value and is dominated by non-native and generally invasive annual grass species with a lesser amount of forb and early successional shrub species.

This habitat makes up the vast majority of the Project site, however this area of wild oat and annual brome grassland was typified by a higher concentration of forb and non-grass herbaceous species than other areas of this habitat within the Project Area. It appears these areas are not regularly maintained allowing more substantive vegetation to establish. Dominate plant species within the Project site include wild oat (*Avena* sp.), ripgut brome (*Bromus diandrus*), foxtail brome, slender buckwheat (*Eriogonum gracile*), strigose lotus (*Acmispon strigosus*), leafy fleabane, and phacelia (*Phacelia* sp.).

Other locations within the Project Area that consist of this habitat include along the disturbed margins of the access road network within the SDG&E property boundary and within the inter-shrub matrix within the CSS habitat. Dominant plant species in areas outside the Project Area include foxtail brome, wild oat, ripgut brome, and short-pod mustard. A total of 6.10 acres of this habitat is located within the Vegetation Survey Area; this habitat is not located within the Project site development footprint.

3.2.3 Diegan Coastal Sage Scrub: Interior form

Diegan Coastal Sage Scrub: Interior form is comprised of herbaceous and low-glowing woody shrubs that are often summer drought deciduous. California buckwheat (*Eriogonum fasciculatum*) is in the shrub layer. This plant community is found in upland areas that is often an early scrubland habitat quickly following a disturbance event. Within the Project Area, two forms of this habitat were present: an almost monotypic stand flanking the preliminary alignment options for the underground generation tie-line dominated by California buckwheat and low-quality habitat along the northern portions of the Project site. Each form is detailed below.

The CSS located within SDG&E's property is of generally low- to moderate-quality with an almost monotypic composition of California buckwheat within the shrub layer and a variety of native and non-native herbaceous and forb species making up the matrix of the habitat. Dominant plant species within this form of CSS include California buckwheat, wild oat, foxtail brome, leafy fleabane, and deerweed.

Low-quality areas of this habitat are located along the northern portion of the Project site. These low-quality habitat areas have a higher degree of non-native species as well as scattered eucalyptus trees (*Eucalyptus* sp.). Dominant plant species within the low-quality CSS within the Project site include California buckwheat, wild oat, ripgut brome, foxtail brome, short-pod mustard, dove weed, and slender buckwheat. A total of 13.20 acres of this habitat is located within the Vegetation Survey Area; 0.62 acre of this habitat are located within the Project site development footprint.

3.2.4 Bare Ground

Bare Ground areas are devoid of vegetation. These areas are generally associated with the existing dirt access roads within SDG&E's property as well as the Project-controlled easement on the Project site. A total of 1.85 acres of this habitat is located within the Vegetation Survey Area; 0.18 acre of this habitat are located within the Project site development footprint.

3.2.5 Rock

Areas described as Rock consisted of exposed granitic bedrock with little to no vegetation. These areas are considered separate from Bare Ground as they have different hydrologic and erosional characteristics. Rock areas are limited to the southwestern corner of the Project site. A total of 0.11 acres of this habitat is located within the Vegetation Survey Area; this habitat is not located within the Project site development footprint.

3.2.6 Urban/Developed

Urban/Developed areas within the Project Area and immediately surrounding areas mainly consist of paved roads, residential and business structures, and associated paved surfaces (i.e. pools, sidewalks, outbuildings, etc.). This habitat type includes areas that would be considered Landscape/Ornamental,

which area areas that are regularly maintained and/or irrigated for aesthetic purposes. These areas are generally highly modified from the surrounding environment and provide limited value to wildlife and plant species. The majority of the area mapped as Urban/Developed is located east and west of the Project Area but also includes areas along the northeastern boundary of the Project site. A total of 9.22 acres of this habitat is located within the Vegetation Survey Area; 0.05-acre of this habitat are located within the Project site development footprint.

3.2.7 Extensive Agriculture – Row Crops

Areas defined as Extensive Agriculture – Row Crops are those in which food crops or other agricultural products are grown with minimal investment of resources for growing and/or harvesting. Agricultural land to the south and east of the Project site consists of silverleaf mountain gum which is grown for the cut-foliage trade. While the cut flower and foliate trade is generally considered intensive agriculture, this species of Eucalyptus readily naturalizes in the local area and requires limited amounts of irrigation. Extensive Agricultural – Row Crop land is mapped immediately to the south and east of the Project site. A total of 2.90 acres of this habitat is located within the Vegetation Survey Area; this habitat is not located within the Project site development footprint.

3.3 SPECIAL STATUS SPECIES

Special status species are defined as listed in local or regional plans, policies, or regulations, by CDFW or USFWS, or are considered sensitive by San Diego County. The following table identifies the criteria used to identify biologically sensitive resources potentially occurring within the Project Area. Within the following subsections, the following designators are used to indicate agency and sensitivity level:

Federal

FE	Federally listed; Endangered
FT	Federally listed; Threatened
FC	Federal Candidate for listing

State

ST	State listed; Threatened
SE	State listed; Endangered
FP	State Fully Protected
RARE	State-listed; Rare (Listed “Rare” animals have been re-designated as Threatened, but Rare plants have retained the Rare designation.)
SSC	State Species of Special Concern
WL	CDFW Watch List

California Rare Plant Rank (CRPR)

List 1A	Plants presumed extinct in California.
List 1B	Plants rare and endangered in California and throughout their range.
List 2	Plants rare, threatened, or endangered in California but more common elsewhere in their range.
List 3	Plants about which we need more information; a review list.
List 4	Plants of limited distribution; a watch list.

CRPR Extensions

0.1 Seriously endangered in California (greater than 80 percent of occurrences threatened/high degree and immediacy of threat).
0.2 Fairly endangered in California (20-80 percent occurrences threatened).
0.3 Not very endangered in California (less than 20 percent of occurrences threatened).

Table 2: Criteria for Evaluating Sensitive Species Potential for Occurrence (PFO)

PFO*	CRITERIA
Absent:	Species is restricted to habitats or environmental conditions that do not occur within the Project Area.
Low:	Historical records for this species do not exist within the immediate vicinity (approximately 5 miles) of the Project Area, and/or habitats or environmental conditions needed to support the species are of poor quality.
Moderate:	Either a historical record exists of the species within the immediate vicinity of the Project Area (approximately 5 miles) and marginal habitat exists within the Project Area, or the habitat requirements or environmental conditions associated with the species occur within the Project Area, but no historical records exist within 5 miles of the Project Area.
High:	Both a historical record exists of the species within the Project Area or its immediate vicinity (approximately 5 miles), and the habitat requirements and environmental conditions associated with the species occur within the Project Area.
Present:	Species was detected within the Project Area at the time of the survey.

3.3.1 Sensitive Plants

Current database searches (CDFW 2019 and CNPS 2019) resulted in a list of 38 federally and/or state listed threatened and endangered or sensitive plant species documented to occur within 5-miles of the Project Area (CNDDB and USFWS data; Attachment A, Figure 2) and within the quadrangles (CNPSEI data) containing and surrounding the Project Area. One additional plant species, from the San Diego County Sensitive (SDCS) Species List, was also analyzed for its potential to occur on the Project. Factors used to determine the potential for occurrence included the quality of habitat, level of anthropogenic influence, elevation, and soils present. In addition, the location of prior CNDDB records of occurrence were used as additional data, but as the CNDDB is a positive-sighting database, these data were used only in support of the analysis from the previously identified factors. A list of plant species observed during the reconnaissance-level survey is provided as Attachment C. Focused Survey Reports from the Nesting Bird and Focused Plant Survey are provided as Attachment E.

The following 28 plant species are considered Absent from the Project Area due to lack of suitable habitat present, the highly disturbed nature of the habitats present, because the species falls outside the elevation range, or was not observed when the plant would have been easily identified within the Project

Area during surveys. Entries marked with an * were originally designated a higher potential of occurrence based on results from the reconnaissance-level survey; however, these species were not observed during the Nesting Bird and Focused Plant Survey and are therefore considered Absent. No special status plant species were observed within the Project Area.

- banner dudleya (*Dudleya alainae*) – CRPR 3.2
- caraway-leaved woodland-gilia (*Saltugilia caruifolia*) – CRPR 4.3
- chaparral nolina (*Nolina cismontana*) – CRPR 1B.2
- Cleveland's bush monkeyflower (*Diplacus clevelandii*) – CRPR 4.2
- Cuyamaca larkspur (*Delphinium hesperium* ssp. *cuyamacae*) – RARE, CRPR 1B.2
- Engelmann oak (*Quercus engelmannii*) - CRPR 4.2
- golden violet (*Viola purpurea* ssp. *aurea*) – CRPR 2B.2
- heart-leaved pitcher sage (*Lepechinia cardiophylla*) – CRPR 1B.2
- lemon lily (*Lilium parryi*) – CRPR 1B.2
- mesa horkelia (*Horkelia cuneata* var. *puberula*) – CRPR 1B.1
- Nevin's barberry (*Berberis nevinii*) – FE, SE, CRPR 1B.1
- Orcutt's Linanthus (*Linanthus orcuttii*) – CRPR 1B.3
- Palomar monkeyflower (*Erythranthe diffusa*) - CRPR 4.3
- Parry's tetracoccus (*Tetracoccus dioicus*) – CRPR 1B.2
- Payson's jewelflower – CRPR 4.2*
- Peninsular spineflower (*Chorizanthe leptotheca*) – CRPR 4.2
- Rainbow manzanita (*Arctostaphylos rainbowensis*) – CRPR 1B.1
- Robinson's peppergrass – CRPR 4.3*
- San Bernardino aster (*Symphyotrichum defoliatum*) – CRPR 1B.2
- San Diego County virguiera (*Bahiopsis laciniata*) - CRPR 4.3
- San Diego milk-vetch (*Astragalus oocarpus*) – CRPR 1B.2
- San Diego sunflower (*Hulsea californica*) – CRPR 1B.3
- San Felipe monardella (*Monardella nana* ssp. *leptosiphon*) – CRPR 1B.2
- southern mountain misery (*Chamaebatia australis*) – CRPR 4.2
- southern mountains skullcap (*Scutellaria bolanderi* ssp. *austromontana*) – CRPR 1B.2
- summer holly (*Comarostaphylis diversifolia* ssp. *diversifolia*) - CRPR 1B.2
- thread-leaved brodiaea (*Brodiaea filifolia*) – FT, SE, CRPR 1B.1
- western dichondra – CRPR 4.2*

The following nine plant species have a Low potential of occurring in the Project Area as the environmental conditions required by the species is of low quality:

- delicate clarkia (*Clarkia delicata*) – CRPR 1B.2
- Dunn's mariposa lily (*Calochortus dunnii*) – RARE, CRPR 1B.2
- Palmer's grappling hook (*Harpagonella palmeri*) – CRPR 4.2
- felt-leaved monardella (*Monardella hypoleuca* ssp. *lanata*) - CRPR 1B.2
- Fish's milkwort (*Polygala cornuta* var. *fishiae*) – CRPR 4.3
- Hall's monardella (*Monardella macrantha* ssp. *hallii*) – CRPR 1B.3
- intermediate monardella (*Monardella hypoleuca* ssp. *intermedia*) – CRPR 1B.3
- Orcutt brodiaea (*Brodiaea orcuttii*) – CRPR 1B.1, SDCS
- Ramona horkelia (*Horkelia truncata*) - CRPR 1B.3

The following two plant species have a Moderate potential of occurrence in the Project Area as the environmental conditions needed for the species exist marginally:

graceful tarplant – CRPR 4.2

Graceful tarplant (*Holocarpha virgata* ssp. *elongata*) is an annual herb that flowers between May and November in chaparral, cismontane woodland, coastal scrub, and valley and foothill grasslands at elevations between 200 and 3,600 feet amsl.

rush-like bristleweed – CRPR 4.3

Rush-like bristleweed (*Xanthisma junceum*) is a perennial herb that flowers from May to October. This species can be found growing on dry hillsides in chaparral, and coast scrub at elevations from 700 to 3100 feet amsl.

3.3.2 Sensitive Wildlife

A current database search (CDFW 2019, USFWS 2019) resulted in a list of 13 federal- and/or state-listed endangered or threatened, SSC, or otherwise sensitive wildlife species documented to occur within the quadrangles containing and surrounding the Project Area (Attachment A, Figure 2). An additional 32 wildlife species from the SDCS Species List were also analyzed for their potential to occur in the Project Area. After a literature review, reconnaissance-level survey, and Nesting Bird Survey, it was determined that seven sensitive wildlife species are considered Absent from the Project Area, 32 species have a Low potential to occur in the Project Area, three species have a moderate potential to occur in the Project area, and three species have a High potential to occur in the Project Area. One coastal California gnatcatcher (*Polioptila californica*; CAGN), was incidentally observed during the reconnaissance-level survey, but the site is not considered occupied by this species. No active avian nests or nesting activity was observed during the Nesting Bird Survey. Factors used to determine potential for occurrence included the quality of habitat, the location of prior CNDDB records of occurrence in relation to the Project Area, and connectivity of the Project Area with sensitive species habitat. A list of the wildlife species observed or detected during the reconnaissance-level survey is provided as Attachment D. Focused Survey Reports from the Nesting Bird and Focused Plant Survey are provided as Attachment E.

The following seven wildlife species are considered Absent from the Project Area due to lack of suitable habitat present, because the species falls outside the elevation range, or no evidence of this species was observed during the survey on the Project Area.

- tricolored blackbird (*Agelaius tricolor*; nesting colony) – ST, SSC, SDCS
- arroyo toad (*Anaxyrus californicus*) – FE, SSC
- least Bell's vireo (*Vireo bellii pusillus*) – FE, SE
- pallid bat (*Antrozous pallidus*) – SSC, SDCS
- southern California legless lizard (*Anniella stebbinsi*) – SSC
- Swainson's hawk (*Buteo swainsoni*; nesting) – FT, SDCS
- western pond turtle (*Emys marmorata*) – SSC

The following 32 wildlife species have a Low potential for occurrence in the Project Area due to low quality, and disturbed suitable habitat. Although many of the avian species listed below have a Low

potential to nest in the Project Area, these species have a Moderate to High potential to forage in the Project Area and therefore, are described in more detail below.

- coastal California gnatcatcher (*Polioptila californica californica;* nesting) – FT, SSC, SDCS
- Cooper's hawk (*Accipiter cooperi*; nesting) –WL, SDCS
- sharp-shinned hawk (*Accipiter striatus*; nesting) – WL, SDCS
- rufous-crowned sparrow (*Aimophila ruficeps canescens*) – WL, SDCS
- grasshopper sparrow (*Ammodramus savannarum;* nesting) - SSC, SDCS
- Bell's sage sparrow (*Amphispiza belli belli*) – WL, SDCS
- Golden eagle (*Aquila chrysaetos*; nesting and wintering) – FP, WL, SDCS
- California glossy snake (*Arizona elegans occidentalis*) – SSC
- turkey vulture (*Cathartes aura*; nesting) – SDCS
- coastal rosy boa (*Charina trivirgata roseofusca)* – SDCS
- northern harrier (*Circus cyaneus hudsonius*; nesting) – SSC. SDCS
- San Diego banded gecko (*Coleonyx variegatus abbottii*) – SSC, SDCS
- Townsend's big-eared bat (*Corynorhinus townsendii*) - SSC, SDCS
- monarch butterfly (*Danaus plexippus*; California overwintering) – SDCS
- San Diego ringneck snake (*Diadophis punctatus similis*) – SDCS
- Stephen's kangaroo rat (*Dipodomys stephensi*) – FE, ST, SDCS
- white-tailed kite (*Elanus leucurus*; nesting) - FP, SDCS
- western mastiff bat (*Eumops perotis californicus*) – SSC, SDCS
- mountain lion (*Felis concolor*) – SDCS
- loggerhead shrike (*Lanius ludovicianus*; nesting) – SSC, SDCS
- California gull (*Larus californicus*; nesting colony) – WL, SDCS
- San Diego black-tailed jackrabbit (*Lepus californicus bennettii*) – SSC. SDCS
- Yuma myotis (*Myotis yumanensis*) – SDCS
- San Diego desert woodrat (*Neotoma lepida intermedia*) – SSC, SDCS
- big free-tailed bat (*Nyctinomops macrotis*) – SSC, SDCS
- pocketed free-tailed bat (*Nyctinomops femorosaccus*) – SSC, SDCS
- southern mule deer (*Odocoileus hemionus*) – SDCS
- southern grasshopper mouse (*Onychomys torridus ramona*) – SSC, SDCS
- Los Angeles pocket mouse (*Perognathus longimembris brevinasus*) – SSC, SDCS
- coast patch-nosed snake (*Salvadora hexalepis virgultea*) – SSC, SDCS
- western spadefoot (*Spea hammondii*) – SSC, SDCS
- American badger (*Taxidea taxus*) – SSC, SDCS

The following three wildlife species have a Moderate potential for occurrence in the Project Area due to marginally suitable habitat conditions Present during the survey.

northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*) - San Diego County Sensitive, SSC

This species is a San Diego County Sensitive Species and CDFW Species of Special Concern. This nocturnal species can be found in a wide range of shrub communities throughout San Diego county except the desert flatlands. Typically associated with rocky areas with isolated shrubs to provide cover during foraging this species is often found foraging on the edge and within grasslands. There are isolated patches of fringe coastal sage scrub habitat located along the northern portions of the Project site. These areas

are isolated from other, higher quality habitat and therefore decrease the potential for occurrence for this species.

red diamond rattlesnake (*Crotalus ruber ruber*) - San Diego County Sensitive, SSC

This species of snake is listed as San Diego County Sensitive and a CDFW Species of Special Concern typically associated with scrub and grassy areas within inland areas of San Diego County. They are primarily nocturnal and crepuscular during periods of excessive daytime heat; but are also active during daylight when the temperature is more moderate or when in the comparatively cooler shaded areas of boulder fields and other rocky areas. This species is found throughout the County in a range of disturbance regimes including suburban and agricultural environments. Due to overall habitat fragmentation and lack of connectivity to higher quality habitat, overall potential for occurrence within the Project Area is reduced to a moderate level.

horned lark (*Eremophila alpestris actis*; foraging and nesting) - San Diego County Sensitive, WL

The horned lark is a species of bird that is both on the San Diego County sensitive species list and the USFWS Watch List. The species as a whole is widely distributed through California and the rest of the southwestern United States. The particular subspecies located within the general area surrounding the Project is considered rare and highly susceptible to disturbance via development and habitat fragmentation. This species is often found in areas where disturbance has occurred and vegetation is beginning to recover (e.g. fire breaks, disturbed lots, preliminary grading), and is typically found along the coastal strand and arid grasslands. The Project Area contains appropriate foraging habitat for this species. Nesting locations are often located on the ground and sheltered by a small shrub or grass (Unitt 2004). While the general habitat within the Survey Area is suitable for this species, it is highly fragmented and separated from areas of higher-quality habitat. Furthermore, higher quality habitat areas are limited in size and connectivity, therefore reducing suitability for this species. The proximity of residential housing and the potential for associated feral cats further reduce the nesting suitability for this species.

The following three wildlife species have a High potential for occurrence in the Project Area due to suitable habitat and food source conditions.

coast horned lizard – SSC, SDCS

The coast horned lizard (*Phrynosoma blainvillii*) is a California Species of Special Concern. It is found along the Pacific coast of California on the western side of the Sierra Mountains to the Baja peninsular area in Mexico. Adults are approximately two to four inches in snout to vent length with numerous elongated and pointed scales or spines on the dorsal side. Two rows of enlarged scales are also present along the flank. This species is brown, yellowish, reddish, or gray with several dark bands that cross the back with highlighted white areas along the rear of the bands (Sherbrooke 2003). This species is found in many habitats, including oak woodlands, chaparral, coastal sage scrub, grasslands, valleys, foothills, riparian wetlands, conifer forests, and semiarid mountains up to 8,000 feet amsl. It inhabits sandy washes or areas with loose, fine, sandy soils for burying, and low brush for cover and open areas for basking. It feeds primarily on harvester ants and other native ant species. Populations of this species have been reduced due to development, agriculture, and the introduction of Argentine ants that heavily compete with native ant species (Stebbins 2003).

coastal whiptail – SSC

The coastal whiptail (*Aspidoscelis tigris stejnegeri*) is an active species found in arid and semi-arid habitats, including coastal sage scrub, broken chaparral, and sparse streamside vegetation. It prefers microhabitats that include open ground for running. Prey items include a range of insects as well as spiders, scorpions, and other reptiles. It is found in deserts and semiarid areas with sparse vegetation and open areas. It can also be found in woodland and riparian areas with firm, sandy, or rocky soils.

orange-throated whiptail –SDCS

This orange-throated whiptail lizard (*Aspidoscelis hyperythra*) can be found from San Bernardino County, California throughout Baja California, Mexico. Suitable habitat includes low-elevation coastal scrub, chamise-redshank chaparral, mixed chaparral, and valley-foothill hardwood habitats (Morey 2000). Hibernation sites occur on well-insulated, south-facing open slopes that are often adjacent to terraces with woody perennials. The Belding's orange-throated whiptail (*Aspidoscelis hyperythra beldingi*) can be found in semi-arid shrub habitat with loose soil and rocks, including washes, streamsides, rocky hillsides, and coastal chaparral ranging from the Santa Ana River in Orange county, Colton in San Bernardino County, west of the Peninsular Ranges, and throughout the Baja Peninsula (California Herps 2012).

Although the following species are listed above as having No potential or a Low potential to nest within the Project Area, these species are described in detail below as they have a Moderate to High potential to forage within the Project Area.

Cooper's hawk - WL, SDCS

This hawk species is a San Diego County sensitive species and a CDFW Watch List species. Having adapted well to urbanization, this species is now associated with a wide range of habitats from urban and suburban areas as well as areas of extensive native habitat (Unitt 2004). Most typically associated with oak forests and mature riparian vegetation this species has been observed frequently in the general area; however, this species was not observed during the reconnaissance-level or nesting bird and focused plant survey efforts. Typically roosting on telephone poles or tall trees while awaiting an opportunity to capture prey, this species primarily preys on other bird species and is often observed to stalk backyard bird feeders for prey. This species typically nests in tall trees below the canopy. While tree species are present within the Survey Area, higher-quality habitat with more prey is located within the rural suburban areas surrounding the Project Area. Therefore, this species has a Low potential to nest within the Project Area and has a Moderate potential to forage within the Project Area.

turkey vulture - SDCS

This species is a San Diego County Sensitive bird species that is found from the coast to the desert in a variety of habitats. While once located throughout San Diego County, this species typically avoids heavily urbanized areas, but can occasionally be observed foraging. This species is migratory, but the general region also supports a year-round population of this bird. Primary prey for this species is carrion, which it locates primarily through its highly developed sense of smell. Nesting typically occurs within rocky areas, caves, or rock crevasses (Unitt 2004), of which no appropriate habitat is found within the Project Area. While this species was not observed during the reconnaissance-level or nesting bird and focused plant survey efforts, this species has many documented observations in the surrounding area, and therefore has a High potential to forage within the Project Area.

white-tailed kite – FP, SDCS

This species of raptor is considered a San Diego County Sensitive species and is a State fully protected species. This species is typically associated with open areas along the edges of forest and woodland habitat and found from the coast to the desert slopes except for highly urbanized areas (Unitt 2004). Habitat loss and urbanization are the largest threats to this species currently, however, this species can utilize urban areas with extensive networks of habitat corridors (i.e. San Diego city's urban canyon system) for foraging purposes. This species' population is closely related to the availability of its primary food source, voles and meadow mice (Unitt 2004); both of which were not observed during the reconnaissance-level or nesting bird and focused plant survey efforts. This species typically nests in the crown of coast live oaks and at the top of clumps of mistletoe (*Phoradendron* spp.); both of which are not present within the Survey Area. This species has a Low potential to nest within the Project Area and has a Moderate potential to forage within the Project Area.

coastal California gnatcatcher – FT, SSC, SDCS

The CAGN is a federally threatened species and a California Species of Special Concern. The range of this species extends southern California west of the Peninsular and Transverse ranges south into northwestern Baja California, Mexico. This species is a permanent resident of Diegan, Riversidian, and Venturan sage scrub sub-associations found from sea level to 2,500 feet in elevation. The species lives and breeds within California sagebrush (*Artemisia californica*) dominant habitats and also occurs in mixed scrub habitats with lesser percentages of this favored shrub (Atwood and Bontrager 2001). The CAGN primarily feeds upon insects including, spiders, leaf hoppers and beetles. The largest threat to the species is a loss of habitat; other threats include wildfires and nest.

Historically, and based on a search of the CNDDB, two sightings of CAGN have been documented within a 5-mile search radius of the Project Area. These occurrences are at least 4.5 miles from the Project Area, located to the south and west in areas with significantly less development than the Project Area.

Based the quality of habitat observed during the two field surveys conducted for the Project (November 2019 and March 2020), CAGN is not expected to nest within the Project site, and it is unlikely for CAGN to nest in CSS within the Project Area within the SDG&E property. The habitat for low nesting potential includes fragments of CSS within the immediate area surrounding the gen-tie line options, with similar species dominance. It is isolated from other patches of habitat by approximately 1,000 feet or more, including developed areas.

A solitary CAGN was detected within scrub habitat during the reconnaissance-level survey performed for the Project in November 2019, approximately 100 feet west of the Option B alignment of the gen-tie line and outside of any anticipated disturbance area; the survey was conducted outside of the breeding season of CAGN (i.e., outside of the period from February 15 – August 31). The solitary CAGN was heard calling and was likely foraging within the California buckwheat west of the Project Area. The CAGN was no longer heard after approximately 5 minutes and was not detected again for the remainder of the survey; this individual was presumed to be dispersing through the Project Area between areas of higher-quality habitat in the vicinity.

A nesting bird and focused plant survey was conducted on March 31, 2020 to identify any nesting birds or nesting activity within the Project site in preparation for geotechnical boring activities associated with the

Project. No active avian nests or nesting activity was found within or adjacent to the Project site. No CAGN were observed or heard calling during this focused survey.

Although CAGN may use monotypic California buckwheat to nest, there is high-quality habitat with a co-dominance of California sagebrush, which is favored by CAGN, in the vicinity to the northeast and south of the Project Area; therefore, the use of the monotypic habitat present within or adjacent to the Project Area for nesting is unlikely. Additionally, the CSS habitat present within the Project site is composed of widely spaced California buckwheat shrubs with high amounts of non-native herbaceous species within the inter-shrub matrix, which decreases the habitat quality and further reduces the potential for nesting. There is limited habitat connectivity between the Project Area and areas of high-quality nesting habitat, located approximately 1,000 feet to the northeast and 3,500 feet south of the Project Area. These areas of higher quality habitat are separated from the Project Area by residential development and active agricultural land, further reducing overall nesting quality. Therefore, based on one detection of a solitary CAGN in November 2019, no observations of CAGN in the spring during the March 2020 nesting bird survey, and low quality, fragmented nesting habitat present within the Project Area; it is unlikely that CAGN would be found nesting within the Project Area, and have a low potential to nest within a 300-foot buffer of the Project Area.

As discussed above, focused surveys for CAGN are being conducted within the Project Area and a 500-foot survey buffer to confirm that the habitat is not occupied. Permitted biologists with 10(a)(1)(A) species recovery-permitted have conducted three rounds of six surveys within suitable CAGN habitat in accordance with the *1997 USFWS protocol, Coastal California Gnatcatcher (Polioptila californica californica) Presence/Absence Survey Guidelines*. Under the framework of the HLP, three surveys are required to document and assess presence or absence of CAGN. No CAGN were identified during the first three surveys. Because it is possible that an HLP cannot be issued by the County due to the absence of a Planning Agreement between the County, USFWS, and CDFW, an additional three surveys (for a total of six surveys) will be conducted. Conducting six surveys is consistent with the protocol to operate outside of the HLP framework. If a Planning Agreement is executed before the completion of surveys 4 through 6, no further surveys will be performed.

3.4 JURISDICTIONAL WETLANDS AND WATERWAYS

During the reconnaissance-level survey, no jurisdictional features were observed within the Project Area. There were two topographical features of note within the Project site that may collect runoff from storm events; each are depicted within Attachment B. One feature consists of a depressional feature, also described as a “sump”, (Attachment B, Photo 10) located near the southern end of the Project-controlled easement on-site. This feature was dominated by upland vegetation and had no clear outlet. A second feature, a topographical depressional (Attachment B, Photo 11), runs northeast to southwest along the central portion of the Project site. This second feature displayed no surface hydrology and was dominated by upland vegetation. Historical satellite imagery shows the second depressional feature was actively mowed perpendicular to the natural slope of the land as recently as 2008. No recorded blue-line features or known wetlands that may be subject to jurisdiction under the County RPO, USACE, RWQCB, or CDFW were observed within the Project Area.

3.5 OTHER UNIQUE FEATURES / RESOURCES

3.5.1 Critical Habitat

Critical Habitat is defined as areas of land, water, and air space containing the physical and biological features essential for the survival and recovery of endangered and threatened species. Designated Critical Habitat includes sites for breeding and rearing, movement or migration, feeding, roosting, cover, and shelter. Designated Critical Habitats require special management and protection of existing resources, including water quality and quantity, host animals and plants, food availability, pollinators, sunlight, and specific soil types. Critical habitat designated delineates all suitable habitat, occupied or not, that is essential to the survival and recovery of the species. According to the USFWS Critical Habitat WebGIS map, the Project Area does not fall within any designated Critical Habitat (USFWS 2020).

3.5.2 Wildlife Movement Corridors

Wildlife corridors are defined as areas that connect suitable habitat in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features, such as canyons, drainages, ridgelines, or areas with dense vegetation cover can provide corridors for wildlife travel. Wildlife corridors are important to mobile species because they provide access to individuals to find shelter, mates, food, and water; allow the dispersal of individuals away from high population density areas; and by allowing immigration and emigration of individuals to other populations they allow for gene flow between populations. The Project Area is bordered by industrial development and is bisected by a busy road. The County General Plan and Valley Center Community Plan do not designate or identify any wildlife corridors within or surrounding the Project Area. Therefore, the Project is not expected to affect wildlife movement.

SECTION 4.0 – SIGNIFICANCE OF PROJECT IMPACTS AND RECOMMENDED MITIGATION

4.1 DIRECT AND INDIRECT IMPACTS

Direct impacts include the physical loss or removal of vegetation due to installation of proposed facilities or work areas. Indirect impacts during construction may include interruption of normal nesting or foraging behaviors, loss of prey items, such as insects or food resources, or the suppression of growth due to excessive dust or noise. Impacts to special status species may occur either through temporary or permanent habitat loss, interruption of normal species routines, or through direct mortality.

Although conformance with the NCMSCP cannot be determined until the final NCMSCP is approved, the Project design is intended to not conflict with the draft plan. According to the draft documents for the NCMSCP, the Project is not located within the PAMA. The PAMA usually consists of high-quality habitats and/or sensitive species that are targeted for preservation within the subarea plan. The draft mapping of the Project Area as outside of the PAMA is consistent with the disturbed nature of the Project Area. As such, Project development would not hinder the success of the draft NCMSCP.

4.1.1 Impacts to Vegetation Communities and Mitigation Requirements

Direct impacts include the physical loss or removal of vegetation due to installation of the Project facilities or work areas. Direct impacts on the Project site are permanent in nature (Project site Development Footprint; see Figure 3). All permanent impacts will occur to habitat that is non-sensitive in nature and that has been highly disturbed by past agricultural activities. Total permanent direct impacts by habitat type are detailed in Table 3 below.

Table 3: Permanent Direct Impacts and Mitigation Ratios by Habitat Type

Habitat	Existing (acres)	Impacts (acres)	Mitigation Ratios	Mitigation Acreage
Disturbed Habitat	5.79	5.79	N/A	0
Bare Ground	0.18	0.18	N/A	0
Diegan Coastal Sage Scrub: Interior form	0.62	0.62	1:1	0.62
Urban/Developed	0.05	0.05	N/A	0
Total	6.64	6.64	-	0.62

Mitigation is required for permanent impacts that occur to Diegan Coastal Sage Scrub: Interior form at a 1:1 ratio. Due to the low-quality and amount of non-native species within the Diegan Coastal Sage Scrub: Interior form that is located within the Project site development footprint, a higher mitigation ratio is not required. The sensitive habitat areas to be impacted are along the interface between disturbed habitat and discontinuous patches of surrounding Diegan Coastal Sage Scrub: Interior form. This habitat does

provide foraging potential for native species; however, is not expected to support sensitive native bird or animal species.

Mitigation requirements for this Project may occur through a number of ways, including but not limited to on-site enhancement, off-site enhancement, or through the purchase of mitigation credits. Both on-site and off-site enhancement involves a combination of hand seeding or hydroseeding, container plants, non-native weeding, and monitoring.

Temporary impacts are limited to disturbance associated with installation of the underground generation tie-line. To varying degrees, the alignment options are located within or adjacent to bare ground, non-native grassland, and CSS of varying quality. These vegetation communities would be temporarily impacted during installation of the gen-tie line (see Figure 3). Regardless of the alignment, those temporary impacts would be restored to pre-Project conditions and no further mitigation is required.

As discussed above, a Conceptual Revegetation Plan has been prepared to provide a description of the revegetation that would occur should the mitigation requirements for permanent impacts be satisfied through the revegetation and enhancement of habitat located on the Project site. If the Project elects to satisfy mitigation requirements through the revegetation and enhancement of habitat located on the Project site, a Final Revegetation Plan may be required as a condition of the project, to be completed at a later date (i.e. prior to grading).

If compensatory mitigation is satisfied through the purchase of mitigation credits, the Project will utilize a San Diego County Conservation Bank with Signed Implementing Agreements with the USFWS and CDFW. Priority will be given to mitigation banks outside of the MSCP and within the Northern Valley or Northern Foothills ecoregion. Mitigation Banks meeting those criteria include Brook Forest Mitigation Bank, Daley Ranch Conservation Bank, Heights of Pala Mesa Conservation Bank, or San Luis Rey Mitigation Bank. If credits cannot be obtained from the mitigation banks listed above, broader search criteria of available CSS mitigation credits will be utilized.

4.1.2 Impacts to Sensitive Plants

After the literature review, assessment of the various habitat types in the Project Area, and the reconnaissance-level survey was conducted, it was determined that 28 of the 39 sensitive plant species with a potential to occur in the area are considered Absent from the Project Area. Of the remaining 10 sensitive plant species, eight have a Low potential to occur and two have a Moderate potential to occur in the Project Area. None of the sensitive plant species with a potential to occur in the Project Area are state- or federal-listed or have a level 4 or higher CRPR rank and therefore do not require mitigation or protection. In addition, no special status plant species were observed within the Project Area.

4.1.3 Impacts to Sensitive Wildlife

Potential impacts to special status species associated with the Project were assessed by analyzing species-specific requirements, including necessary vegetation habitat, elevational range, foraging needs, denning or breeding requirements, migratory trends, current ranges, and known occurrences or records. After the literature review, the assessment of the various habitat types in the Survey Area, and the reconnaissance-level survey was conducted, it was determined that within the Project Area, eight of the 46 sensitive wildlife species are considered Absent, 32 species have a Low potential to occur, three species have a Moderate potential to occur, and three species have a High potential to occur.

While a solitary coastal California gnatcatcher was heard calling from scrub habitat west of the Project Area (Attachment F), this species is not expected to nest within the Project Area or surrounding native habitat due to a lack of preferred nesting sites dominated by California sagebrush and a lack of habitat connectivity to patches of more favorable/higher-quality habitat. However, this species may forage within and surrounding the Project Area.

Per USFWS protocol, six focused surveys for CAGN are being conducted within the Project Area and a 500-foot survey buffer to confirm that the habitat is not occupied. No CAGN were identified during surveys 1 to 3. If a Planning Agreement is executed between the County and USFWS/CDFW before the completion of surveys 4 to 6, no further surveys will be performed. If a Planning Agreement is in place, a Habitat Loss Permit (HLP) will be issued by the County to account for habitat loss associated with the conversion of CSS.

Take of CAGN is not reasonably certain to occur. Should surveys reveal limited occupation or use within 500 feet of the Project Area, avoidance and minimization measures will be applied. The County's required mitigation ratio of 1:1 is consistent with the findings necessary for issuance of an HLP. However, if a Planning Agreement between the County and USFWS/CDFW is not in place at the time a grading permit is issued, the Developer will initiate informal consultation with USFWS and CDFW to receive concurrence that take is not reasonably certain to occur or, if it is determined that take is reasonably certain to occur, will initiate formal consultation with USFWS for an Incidental Take Permit (through a low effect Habitat Conservation Plan).

With proper construction best management practices (BMP), no impacts are anticipated to these species as a result of Project related activities. Examples of BMPs that would be applicable include:

- If construction-related activities are to occur during the bird breeding season (February 15 to August 31 – passerines; February 1 to June 1 - raptors) a nesting bird survey should be conducted prior to work. If an occupied nest is located within the work area or within a 300-foot buffer surrounding Project attributes, work should be avoided until the nest fails naturally or the nestlings fledge on their own. Dependent on species and disturbance tolerance, a biological monitor may monitor and actively buffer the nest during construction related activities.
- Temporary silt fencing and straw wattle or other BMPs should be utilized along the perimeter of the Project Area to minimize sediment from escaping the work site, consistent with the Project's Stormwater Quality Management Plan.
- Any open trenches or holes should be covered at the end of work each day and sealed with dirt to prevent the entrapment of wildlife.
- Due to the expected grading, appropriate fugitive dust control measures should be implemented to minimize impacts to the surrounding areas.

Reptile species with a moderate potential for occurrence are highly vagile and typically flee anthropogenic disturbance. With the proper construction BMPs listed above, no impacts are anticipated to these species as a result of Project related activities.

The Project has been designed to avoid impacts to CAGN and their nesting habitat to the extent practicable by largely limiting disturbance to areas that have been previously disturbed. In addition to the

BMPs listed above, the following avoidance and minimization measures will be implemented during Project construction and operation to ensure that take of CAGN is not reasonably certain to occur:

- If construction-related activities are to occur during the CAGN breeding season (February 15 to August 31) at least one survey within 72 hours before the start of construction activities would be performed by a qualified avian biologist with the appropriate permits. If an occupied nest is located within the work area or within a 300-foot buffer surrounding Project Area, work should be avoided within a 300-ft buffer until the nest fails naturally or the nestlings fledge on their own.
- If an active CAGN nest is located during nesting surveys, a biological monitor will monitor the nest during construction related activities to ensure the nest buffer is maintained and is sufficient to avoid disturbance to the nest until it fledges or fails naturally. Any reduction to the 300-ft buffer would be done in coordination with USFWS and CDFW.
- To reduce the potential influence of artificial lighting, shielding, baffles, or other hardware will be used on structures to promote down lighting. Reduced use of lights will be encouraged and incorporated into Project design.
- To minimize potential for vehicle collisions, vehicle speed limits of 15 miles per hour (or less) will be posted and enforced within the Project site.
- To reduce the potential for the artificial increase of potential nest predators in the Project Area and surrounding landscape, a garbage abatement policy will remain in place that prohibits the disposal of garbage in the Project Area outside of designated and covered receptacles.
- Utilizing existing roads and infrastructure, where feasible.

The Project is not likely to adversely affect any state or federally listed species or critical habitat, including CAGN. Focused surveys for CAGN are ongoing and no CAGN has been detected during the first three of six surveys. Based on the results of surveys to date, the Developer anticipates that the Project is not likely to adversely affect listed species or critical habitat nor is take of CAGN reasonably certain to occur.

4.2 IMPACTS TO MIGRATORY BIRDS PROTECTED UNDER THE MIGRATORY BIRD TREATY ACT, AS AMENDED (16 USC 703-711)

In order to comply with the Migratory Bird Treaty Act (MBTA) and County regulations, any vegetation clearing should take place outside the general bird breeding season (February 1 to August 31), to the maximum extent practical. If this is not possible, prior to ground-disturbing activities, a qualified biologist should conduct and submit a migratory nesting bird and raptor survey report. The survey should occur no more than 72 hours prior to initiation of Project construction activities, and any occupied passerine and/or raptor nests occurring within or adjacent to the Survey Area should be delineated. Additional follow-up surveys may be required by the resource agencies. If an active nest is identified, an avoidance buffer zone around occupied nests (as determined by the avian biologist) should be maintained during physical ground-disturbing activities. The buffer zone should be sufficient in size to prevent impacts to the nest. Once nesting has ceased, the buffer may be removed.

4.3 CUMULATIVE IMPACT ANALYSIS

Section 15183 under the California Environmental Quality Act (CEQA) Guidelines allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified. Projects that are consistent with the County of San Diego's EIR for the General Plan Update

(GPU), dated August 3, 2011, may qualify for a 15183 exemption. This Project qualifies for the 15183 exemption as it meets the following criteria:

- The project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.
- There are no project-specific effects which are peculiar to the project or its site.
- There are no project-specific impacts which the GPU EIR failed to analyze as significant effects.
- There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.
- There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.

The Project would not result in cumulative impacts with the incorporation of the proposed mitigation measures.

SECTION 5.0 – REFERENCES

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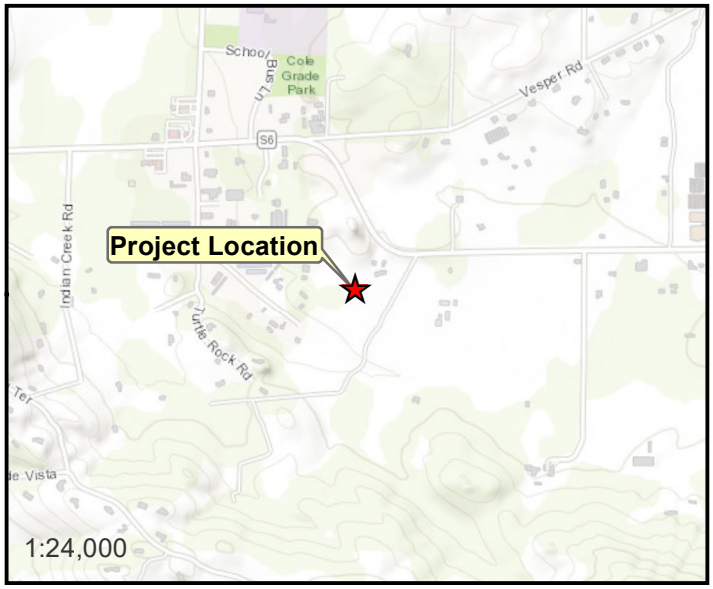
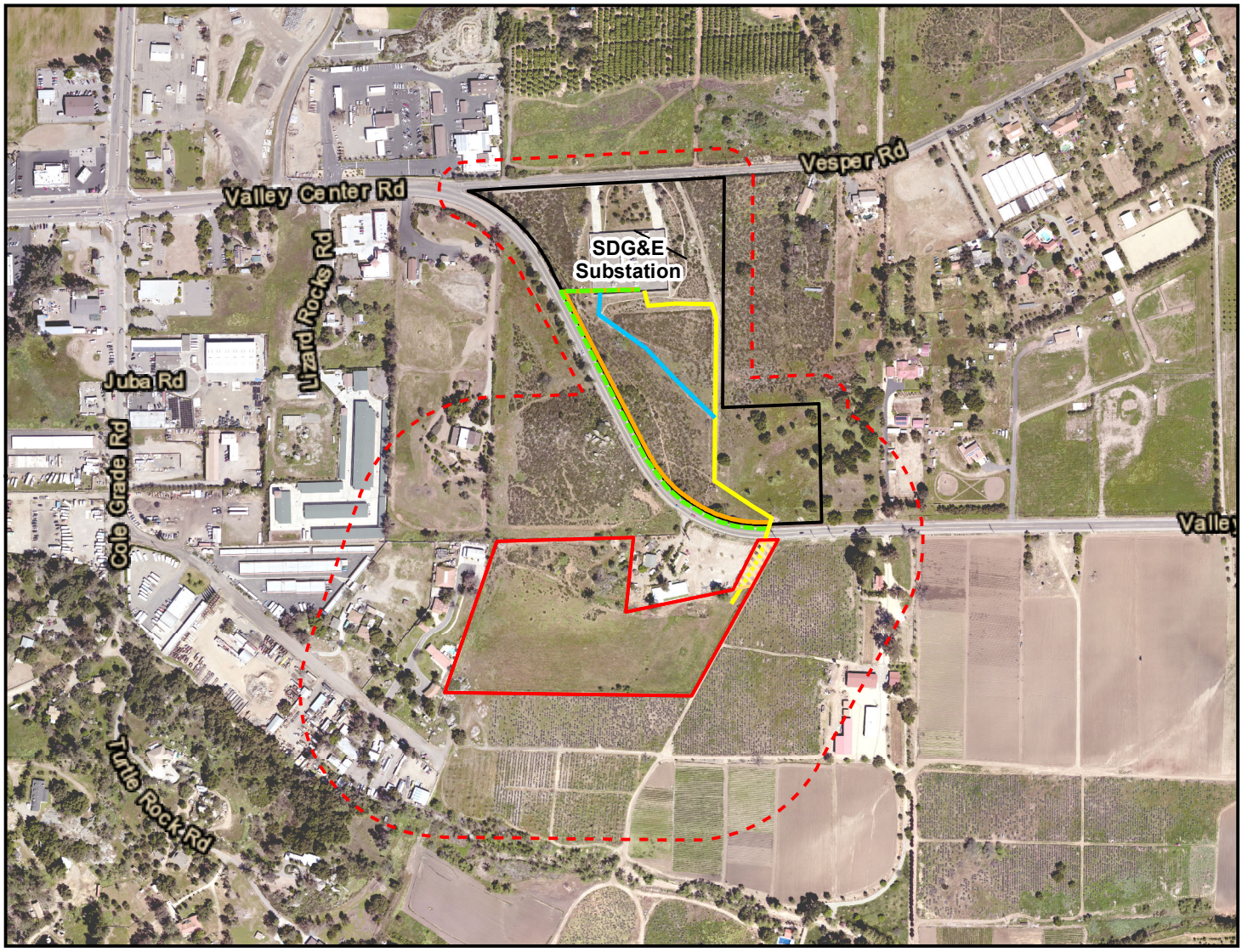
ATTACHMENT A – FIGURES





Project Site
Survey Area
SDG&E Property Boundary
Private Access Easement

Preliminary Underground 69kV Alignment

Option A
Option B
Option C
Option D

Figure 1

Valley Center Storage Project
Location and Vicinity

Name: 21206 BIO Fig 1 Location and Vicinity.Mxd
Print Date: 4/28/2020, Author: pcarlos

CHAMBERS GROUP

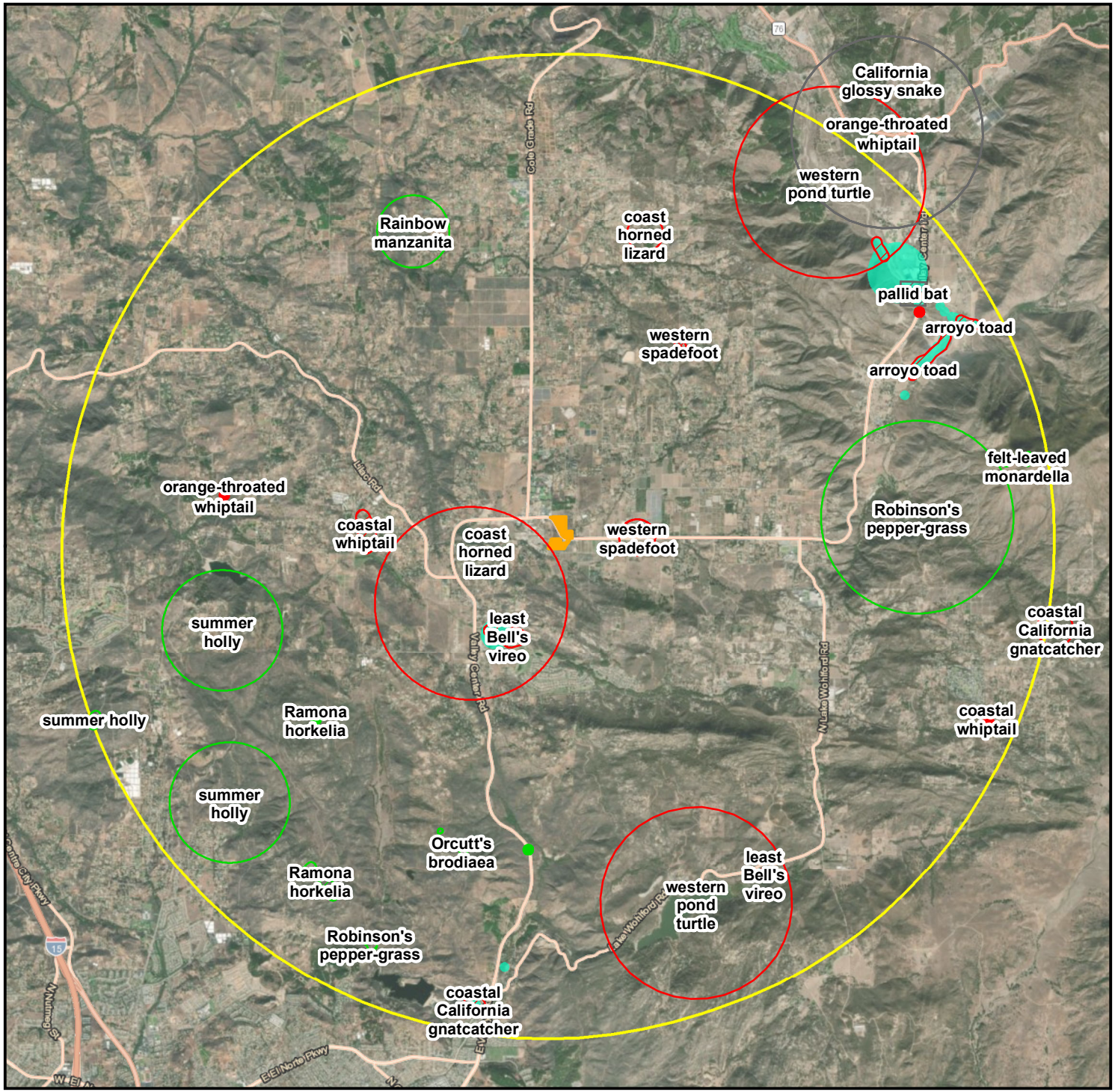


Figure 2

Valley Center Storage Project
CNDDB & USFWS
Occurrences

- Project Area
- 5 Mile Buffer
- USFWS Occurrences

CNDDB Occurrences

- Plant (80m)
- Plant (specific)
- Plant (non-specific)
- Plant (circular)
- Animal (80m)
- Animal (specific)
- Animal (non-specific)
- Animal (circular)
- Multiple (non-specific)
- Multiple (circular)

N

0 0.5 1 2

Miles

Name: 21206 BIO Fig 2 CNDDB and USFWS Occurances.Mxd
Print Date: 4/28/2020, Author: pcarlos

CHAMBERS GROUP

Figure 3
Valley Center Storage Project
Vegetation Communities

- Project Site
- 100ft Buffer
- SDG&E Property Boundary
- Private Access Easement
- Project Site Development Footprint

Preliminary Underground 69kV Alignment

- Option A
- Option B
- Option C
- Option D

Vegetation Communties

- Extensive Agriculture Row Crops
- Bare Ground
- Diegan Coastal Sage Scrub: Interior form
- Disturbed
- Non-Native Grassland
- Rock
- Urban/Developed

N

0 100 200 400

Feet

Name: 21206 BIO Fig 3 Vegetation Communties.Mxd
Print Date: 4/28/2020, Author: pcarlos

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ATTACHMENT B – SITE PHOTOGRAPHS

ATTACHMENT B – SITE PHOTOGRAPHS

	**Photo 1 –** Preliminary alignment of off-site underground 69kV linear with the SDG&E 69kV Valley Center Substation in the right background. Diegan Coastal Sage Scrub: Interior form and Bare Ground are visible within the photo. Photo is facing west.
	**Photo 2 –** Preliminary alignment of off-site underground 69kV linear. Diegan Coastal Sage Scrub: Interior form and Bare Ground are visible within the photo. Photo is facing south toward Valley Center Road.

	**Photo 3 –** Preliminary alignment of off-site underground 69kV linear with Valley Center Road in the midground and the SDG&E 69kV Valley Center Substation in the left background. Diegan Coastal Sage Scrub: Interior form is visible in the background, with Non-Native Grassland and Bare Ground in the mid- and foreground. Photo is facing north.
	**Photo 4 –** Project site with the easement to Valley Center Road in the background. Disturbed Habitat is visible in the mid- and foreground. Photo is facing northeast.

Photo 5 – Project site comprised of Disturbed Habitat. Photo is facing northeast.

Photo 6 – Project site. Disturbed Habitat visible in the foreground with Diegan Coastal Sage Scrub: Interior form visible in the background. Photo is facing north.

	**Photo 7 –** Silver Mountain gum (*Eucalyptus pulverulenta*) grove south of the Project site with Disturbed Habitat in the foreground. Photo is facing south.
	**Photo 8 –** A water well and cisterns (33.2269594, -117.0178113) approximately 100 feet west of the eastern Project site property boundary. Disturbed Habitat is visible in the foreground. Photo is facing west.

	**Photo 9 –** Close-up of the water well and cisterns within the Project site. Photo is facing southeast.
	**Photo 10 –** The manmade depression also described as a "sump" located in the northeast quadrant of the Project site dominated by Disturbed Habitat. Photo is facing northwest.

	**Photo 11 –** Low-lying topographical feature running in a northeast to southwest direction on the Project site and dominated by Disturbed Habitat. Photo is facing south.
	**Photo 12 –** The northern quadrant of the Project site. Low-quality Diegan Coastal Sage Scrub: Interior form is visible in the foreground with Aleppo Pine (*Pinus halepensis*) scattered throughout. Photo is facing west.

ATTACHMENT C – VEGETATION SPECIES LIST

ATTACHMENT C: VEGETATION SPECIES OBSERVED WITHIN THE SURVEY AREA

Scientific Name	Common Name
GYMNOSPERMS	
PINACEAE	**PINE FAMILY**
Pinus halepensis	Aleppo pine
ANGIOSPERMS (EUDICOTS)	
ASTERACEAE	**SUNFLOWER FAMILY**
Ambrosia psilostachya	western ragweed
Artemisia californica	California sagebrush
Carduus pycnocephalus subsp. *pycnocephalus*	Italian thistle
Erigeron canadensis	horseweed
Erigeron foliosus var. *foliosus*	leafy fleabane
Stephanomeria sp.	wreathplant
BRASSICACEAE	**MUSTARD FAMILY**
*Hirschfeldia incana**	Short-pod mustard
CHENOPODIACEAE	**GOOSEFOOT FAMILY**
Salsola tragus	Russian thistle
EUPHORBIACEAE	**SPURGE FAMILY**
Chamaesyce sp.	spurge
Croton setiger	turkey-mullein
FABACEAE	**LEGUME FAMILY**
Acmispon glaber	deerweed
Acmispon strigosus	strigose lotus
LAMIACEAE	**MINT FAMILY**
Salvia columbariae	Chia
Trichostema lanceolatum	vinegar weed
MYRTACEAE	**MYRTLE FAMILY**
Eucalyptus pulverulenta	silver dollar eucalyptus
Eucalyptus sp.	gum tree
PLANTAGINACEAE	**PLANTAIN FAMILY**
Plantago sp.	plantain
POLEMONIACEAE	**PHLOX FAMILY**
Navarretia hamata subsp. *hamata*	hooked navarretia
POLYGONACEAE	**BUCKWHEAT FAMILY**
Eriogonum fasciculatum	California buckwheat
Eriogonum gracile	slender woolly buckwheat
SALICACEAE	**WILLOW FAMILY**
Salix lasiolepis	arroyo willow
TAMARICACEAE	**TAMARISK FAMILY**
Tamarix sp.	tamarisk

ANGIOSPERMS (MONOCOTS)	
ARECACEAE	**PALM FAMILY**
Syagrus romanzoffiana	Queen palm
Washingtonia robusta	Mexican fan palm
POACEAE	**GRASS FAMILY**
Avena sp.	wild oat
Brachypodium distachyon	false-brome
Bromus diandrus	ripgut brome
Bromus hordeaceus	soft chess
Bromus madritensis	foxtail brome
Festuca myuros	rat-tail fescue
Schismus barbatus	Mediterranean schismus

ATTACHMENT D – WILDLIFE SPECIES LIST

ATTACHMENT D: WILDLIFE SPECIES DETECTED WITHIN THE SURVEY AREA

Scientific Name	Common Name
CLASS AVES	**BIRDS**
ODONTOPHORIDAE	**NEW WORLD QUAIL**
Callipepla californica	California quail
COLUMBIDAE	**PIGEONS & DOVES**
Columba fasciata	band-tailed pigeon
CUCULIDAE	**CUCKOOS, ROADRUNNERS AND ANIS**
Geococcyx californianus	Greater roadrunner*
PICIDAE	**WOODPECKERS**
Melanerpes formicivorus	acorn woodpecker
TYRANNIDAE	**TYRANT FLYCATCHERS**
Sayornis nigricans	black phoebe
Sayornis saya	Say's phoebe
Tyrannus verticalis	western kingbird
TROCHILIDAE	**HUMMINGBIRDS**
Calypte anna	Anna's hummingbird*
TROGLODYTIDAE	**WRENS**
Troglodytes aedon	house wren
POLIOPTILIDAE	**GNATCATCHERS**
Polioptila californica	California gnatcatcher
PASSERELLIDAE	**NEW WORLD SPARROWS AND TOWHEES**
Melozone crissalis	California Towhee*
AEGITHALIDAE	**BUSHTIT**
Psaltriparus minimus	bushtit*
MIMIDAE	**MOCKINGBIRDS, THRASHERS**
Mimus polyglottos	northern mockingbird*
Toxostoma redivivum	California thrasher
CORVIDAE	**CROWS AND JAYS**
Corvus corax	common raven*
ACCIPITRIDAE	**KITES, EAGLES AND HAWKS**
Buteo jamaicensis	red-tailed hawk*
PARULIDAE	**WOOD WARBLERS**
Setophaga coronata	yellow-rumped warbler
EMBERIZIDAE	**EMBERIZIDS**
Zonotrichia leucophrys	white-crowned sparrow
FRINGILLIDAE	**FINCHES**
Haemorhous mexicanus	house finch
CLASS MAMMALIA	**MAMMALS**
LEPORIDAE	**HARES & RABBITS**
Sylvilagus audubonii	desert cottontail
SCIURIDAE	**RODENT**
Otospermophilus beecheyi	California ground squirrel*
CANIDAE	**WOLVES & FOXES**
Canis latrans	coyote

*denotes species only observed on March 31, 2020 Nesting Bird Survey.

ATTACHMENT E – FOCUSED SURVEY REPORTS

ATTACHMENT E – NESTING BIRD AND FOCUSED PLANT SURVEY REPORT

PROJECT & SURVEY INFORMATION			
Requestor:	Valley Center ESS, LLC	**Date:**	March 31, 2020
Project Name:	Valley Center Storage Project	**Start time:**	1200
Surveyor:	Natalie Borchardt	**End time:**	1400

WEATHER CONDITIONS			
START			
Temperature (°F): 76	**Wind speed (mph):** 1-3	**Cloud Cover (%):** 100	**Precipitation (%):** 0
END			
Temperature (°F): 80	**Wind speed (mph):** 0-2	**Cloud Cover (%):** 100	**Precipitation (%):** 0

SITE INFORMATION	
Site:	Valley Center Storage Project Site
Site Description:	Habitat consists of primarily disturbed land that was previously used as farmland and has been extensively graded and leveled. Small areas of low-quality California buckwheat scrub habitat and exposed bedrock are present along the northern portions. The Project site is surrounded by multiple Silverleaf mountain gum (*Eucalyptus pulverulenta*) groves used for the cut flower trade to the east and south, residential properties to the west and north, as well as bordered by Valley Center Road to the north.
Proposed Activities:	Biologist to complete nesting bird survey and focused plant survey prior to geotechnical boring.

SURVEY RESULTS

- No active avian nests or nesting activity was found within the Project site.

Avian species detected during nesting survey included: northern mockingbird (*Mimus polyglottos*), bushtit (*Psaltriparus minimus*), common raven (*Corvus corax*), house finch (*Haemorhous mexicanus*), California towhee (*Melozone crissalis*), California quail (*Callipepla californica*), red-tailed hawk (*Buteo jamaicensis*), greater roadrunner (*Geococcyx californianus*), and Anna's hummingbird (*Calypte anna*).

- None of the three rare plants with potential to occur were found within or adjacent to the Project site.

The following rare plants were not observed during the focused plant survey that was conducted within each species blooming cycle: Robinson's peppergrass (*Lipidium virginicum* var. *robinsonii*), Payson's jewelflower (*Caulanthus simulans*), and western dichondra (*Dichondra occidentalis*).

CONCLUSIONS & RECOMMENDATIONS

No active avian nests were found during the survey. No rare plants were found during the survey. Therefore, Project geotechnical boring activities can proceed as planned, and no monitoring is required at this time. It is recommended that if work is delayed or the site is not active for a period of 5 days that a followup nest survey be conducted to ensure no new nests have been established within the work area.

PHOTOGRAPHS

Photo 1. Overview of Project site from the southeast corner of the parcel. Photo taken facing west.

ATTACHMENT F – CNDDB ONLINE FIELD SURVEY FORM REPORT

CNDDB Online Field Survey Form Report

California Natural Diversity Database
Department of Fish and Wildlife
1416 9th Street, Suite 1266
Sacramento, CA 95814
Fax: 916.324.0475
cnddb@wildlife.ca.gov
www.dfg.ca.gov/biogeodata/cnddb/

This data has been reported to the CNDDB, but may not have been evaluated by the CNDDB staff

Source code OLM19F0002
Quad code 3311721
Occ. no. _____
EO index no. _____
Map index no. _____

Scientific name: *Polioptila californica californica*

Common name: coastal California gnatcatcher

Date of field work (mm-dd-yyyy): 11-19-2019

Comment about field work date(s):

OBSERVER INFORMATION

Observer: Erik Olmos

Affiliation:

Address: 9620 Chesapeake Drive, Suite 202 , San Diego, CA 92123

Email: eolmos@chambersgroupinc.com

Phone: (858) 541-2800 Ext.: 7287

Other observers:

DETERMINATION

Keyed in:

Compared w/ specimen at:

Compared w/ image in:

By another person:

Other: Vocalization

Identification explanation:

Identification confidence: Very confident

Species found: Yes **If not found, why not?**

Level of survey effort: Incidentally heard during a field reconnaissance survey

Total number of individuals: 1

Collection? No **Collection number:**

Museum/Herbarium:

ANIMAL INFORMATION

How was the detection made? Heard calling

Number detected in each age class:

adults	juveniles	larvae	egg mass	unknown
1				

Age class comment: Visual was not obtained but is presumed to be an adult.

Bird site use:

☐ Nesting ☐ Rookery ☐ Nesting colony ☐ Burrow site ☐ Lek

☑ Non-breeding (over-wintering) ☐ Communal roost ☐ Other

Site use description: CAGN observed outside the nesting season

What was the observed behavior? The CAGN individual was heard vocalizing from within vegetation, within which it remained.

Describe any evidence of reproduction:

SITE INFORMATION

Habitat description: Diegan Coastal Sage Scrub, interior form

Slope: Land owner/manager:

Aspect:

Site condition + population viability: Good

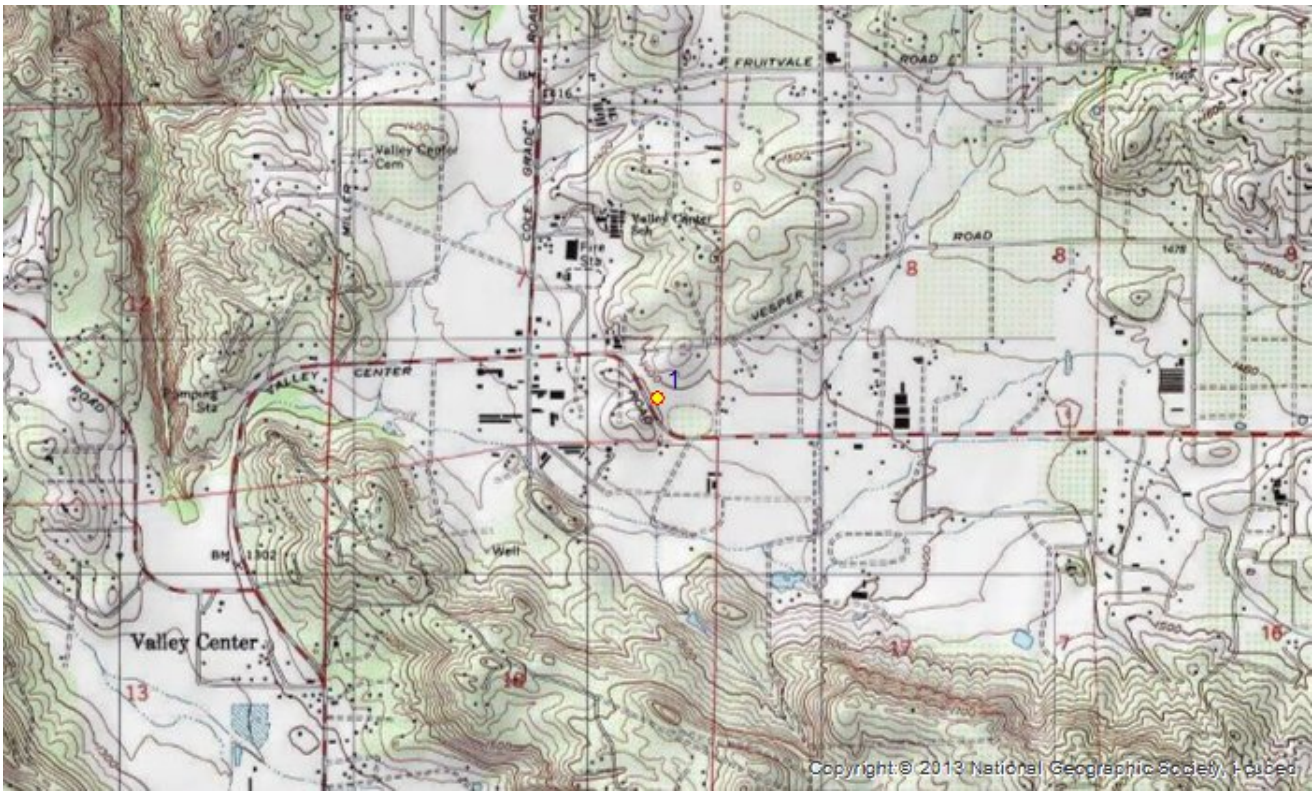
Immediate & surrounding land use: Developed, including a substation and residential. Agriculture

Visible disturbances:

Threats:

General comments:

MAP INFORMATION



ID	County	24K Quadrangle	Elev. (ft)	Latitude NAD83	Longitude NAD83	UTM E NAD83	UTM N NAD83	UTM Zone
	San Diego	Valley Center	1399	33.22968	-117.01828	498297	3676750	11
1	**Public Land Survey**	**Feature Comment**						
	S T11S R01W 7							

The mapped feature is accurate within: 5 m

Source of mapped feature: ArcGIS

Mapping notes:

Location/directions comments:

Attachment(s):

APPENDIX B – SITE PHOTOGRAPHS

ATTACHMENT B – SITE PHOTOGRAPHS

	**Photo 1 –** Disturbed habitat located within the Valley Center Storage Project site. Photo is facing east.
	**Photo 2 –** Disturbed habitat located along the eastern margins of the Project site. Photo is facing northeast.

	**Photo 3 –** low-quality coastal sage scrub habitat located within the Project site. Photo is facing west.
	**Photo 4 –** low-quality coastal sage scrub habitat located within the Project site. Photo is facing southwest.

Photo 5 – non-native grassland habitat associated with gen-tie lines Option A and B (red line) after crossing Valley Center Road. Photo is facing north.

Photo 6 – coastal sage scrub reference site 1 located adjacent (east) to the SDG&E 69kV Valley Center Substation. Photo is facing northeast.

	**Photo 7 –** coastal sage scrub reference site 1 located adjacent (east) to the SDG&E 69kV Valley Center Substation. Photo is facing northeast.
	**Photo 8 –** View of gen-tie line Option B route through non-native grassland habitat. Photo is facing southeast.

Photo 9 – erosional scar left by ephemeral runoff along gen-tie line Option B route through non-native grassland habitat. The SDG&E 69kV Valley Center Substation is visible in the background Photo is facing northwest.

Photo 10 – disturbed and non-native grassland habitat at reference site 2, looking north.