California Native Plant Society

San Diego Chapter of the California Native Plant Society
P O. Box 121390
San Diego CA 92112-1390
conservation@cnpssd.org | www.cnpssd.org

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California Public Utilities Commission
c/o Panorama Environmental, Inc.
1 Embarcadero Center, Suite 740
San Francisco, CA 94111
sycamorepenasquitos@panoramaenv.com

RE: San Diego Gas & Electric Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project

Dear Sir or Madam:

We appreciate the opportunity to comment on the San Diego Gas & Electric Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project (Project). The San Diego Chapter of the California Native Plant Society (CNPSSD) works to protect California's native plant heritage and preserve it for future generations. CNPSSD promotes sound plant science as the backbone of effective natural areas protection. We work closely with decision-makers, scientists, and local planners to advocate for well informed and environmentally friendly policies, regulations, and land management practices.

We have a comment and additional information. Of the five alternatives presented, we advocate Alternative 5—The Environmentally Superior Alternative. While we acknowledge that this will cost more in the short term and be more inconvenient, these costs are relative. The preferred Alternative (#1) may be cheaper, but it exposes the power line to more risk, for it crosses areas that may burn fiercely, such as the old-growth chaparral on Del Mar Mesa. While these areas are (hopefully) unlikely to burn, if they do, the line will have to be shut down, likely causing blackouts and thereby exacerbating the emergency. The 2011 blackout demonstrated that this part of San Diego does not function well without electricity, and trying to evacuate thousands of people with the power out will be a serious problem.

In environmental terms, Del Mar Mesa (under Segment C of the Preferred Project Alternative) is the last major stand of old growth chaparral dominated by Nuttall's scrub oak (*Quercus dumosa,* a CRPR list 1B sensitive species), and it contains some species not found elsewhere in California, although these are outside the Project area. While we do not assume that things will go wrong while the Project is constructed, if an accident occurs during construction or during operations in this area, it will have major consequences, from destroying old growth and taking endangered species to potentially threatening nearby homes if a fire starts.

The Preferred Option is cheap but risky, and if the risks materialize, they will be more expensive than the Environmentally Superior Alternative 5. That is why we advocate for the latter.

Second, we agree with purported advice from the wildlife agencies, that, if the Preferred Project Alternative is chosen, that construction equipment not drive on the top of Del Mar Mesa between (32.944139°, -117.167604°) and (32.951477°, -117.168836°). Given the plethora of sensitive species, it would be much simpler to drive in on either side and use a helicopter to carry lines between posts. Also, unless the roads are totally dry and hard, the road is clay. The vernal pools in the road are mostly due to trucks making ruts, and pools forming subsequently. The area does not need more such activity.

Last, since we have extensive botanical knowledge of Del Mar Mesa, we would like to correct and add some information.

- With one known exception that is not in the Project area, all the scrub oaks on Del Mar Mesa (Segment C) are Nuttall's scrub oaks, not hybrids or other species. Fred Roberts, who literally wrote the book (*Illustrated Guide to the Oaks of the Southern California Floristic Province*) has botanized the area. We examined over 100 oaks in the area, and found one putative hybrid. The oaks in the area are unusually large for Nuttall's scrub oaks, but it is because they are unusually old and in ideal habitat. We are happy to lead surveyors to the one hybrid for confirmation. In general, it is simpler to treat all scrub oaks found on Del Mar Mesa as Nuttall's scrub oak, which is a list 1B sensitive species.
- Jon Rebman, head of the herbarium at the San Diego Natural History Museum (SDNHM) has also botanized the area, and he found two sensitive species within the Project area for Segment C that are not listed in the EIR. The specimens are deposited at SDNHM, and data can be found online. These are:
    - California groundsel (*Senecio aphanactis*). SDNHM specimen 231565 (Lat: 32.93969 °, Long: -117.17338 °), list 1B, and
    - Knotweed spineflower (*Chorizanthe polygonoides* var. *longispina*). SDNHM specimen 231704 ((Lat: 32.94412 °, Long: -117.16659 °), list 1B

  Of these, the knotweed spineflower is most problematic, since it grows in the road around a road pool between the two points given above, and would likely be run over by work trucks. The California groundsel would only be endangered by something going wrong, but its location needs to be known and avoided by workers.

In sum, we are happy to provide this additional information to the Project and to strongly advocate for the Environmentally Superior Alternative 5. Thank you for taking our comments. If there are any questions, please contact Frank Landis at conservation@cnpssd.org. Please keep us informed of future developments with this project.

Sincerely,

Frank Landis, PhD
Conservation Chair, CNPSSD