



William Yee
TL6975 Environmental Project Manager
San Diego Gas & Electric Company
(T) 619-857-8922

February 7, 2022

Trevor Pratt
Project Manager
California Public Utilities Commission
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102

Re: Minor Project Refinement No. 6 for the TL 6975 San Marcos to Escondido Project.

Mr. Pratt:

San Diego Gas & Electric (SDG&E) is hereby requesting approval of Minor Project Refinement No. 6 (MPR-6) from the California Public Utilities Commission (CPUC) for the TL 6975 San Marcos to Escondido Project (Project). Approval of MPR-6 will authorize the relocation of Location 78 and its associated work area to facilitate wire installation operations associated with Segment 3 of the Project.

The MPR-6 work area is located entirely within the transmission right-of-way (ROW). The requested additional work area will total approximately 6,090 square feet, or 0.14 acre.

Please refer to **Attachment B, MPR-6 Figure** and **Attachment C, MPR-6 Site Photographs** to view the MPR-6 work area.

Attachment A: MPR-6 Form

Attachment B: MPR-6 Figure

Attachment C: MPR-6 Site Photographs

Attachment D: Habitat Impact Limit and Mitigation Accounting

As stated above, SDG&E is requesting approval of MPR-6 for the relocation of Location 78 and its associated work area to facilitate wire installation operations associated with Segment 3 of the TL6975 San Marcos to Escondido Project (Project). A non-Project related structure was installed in place of Location 78 after the Project had been designed, resulting in the overhead alignment in this junction to be reconfigured.

In regards to the project requiring the relocation of Location 78 and its associated work area, SDG&E acknowledges that the TL6975 Project design should have been revised to include this change when finalizing the IS/MND (April 2019 - Jan 2020), and is reviewing internally how to improve to avoid similar situations in the future.

The TL6975 Project was designed in 2016 and the PEA application was filed in November 2017. The distribution regulator station was approved by SDG&E internally in December 2018 and was installed in mid-2020. The distribution regulator station needed to be installed to support customer voltage needs and could not wait for the TL6975 Project to be approved so it was installed separately from the Project.

Description of MPR-6 Workspace and Activities

Grubbing of vegetation and grading will be required within the MPR-6 permanent impact area in order to create a level construction work area and work pad. Grubbing and grading would be performed with a dozer, backhoe or similar equipment. Vegetation trimming will also take place within the temporary portion of the MPR-6 work area. Vegetation trimming would be completed with both hand tools and a skid steer with a mower deck and would be no less than 4 inches above the ground to maintain the root structure and seed bank per the SDG&E Natural Communities Conservation Plan (NCCP) Operational Protocol No. 36 (Section 7.1).

The MPR-6 work area would be accessed from the existing access road entrance off San Elijo Road. The non-jurisdictional concrete v-ditch drainage that runs parallel to the MPR-6 work area will be protected by trench plates and Stormwater Pollution Prevention Plan (SWPPP) best management practices (BMPs) during construction. A concrete brow ditch will be installed on the upslope of the work pad to allow for proper drainage and it would tie into the existing non-jurisdictional concrete v-ditch. The work pad would consist of compacted Class 2 base. A Grading Permit (or Grading Permit addendum) issued by the City of San Marcos would include the grading and design of the work pad and brow ditch feature within the permanent portion of the MPR-6 work area. A copy of the Grading Permit would be provided to the CPUC prior to starting any activities covered under the permit in accordance with Section 2.0 of the Mitigation Monitoring, Reporting and Compliance Program (MMRCP). In accordance with the SWPPP, the temporary disturbance associated with the MPR-6 work area will be stabilized with a native seed mix.

Preconstruction Requirements and Permit/Approvals

The activities described herein will not change the conditions set forth in the CPUC's NTP-1 approval letter dated September 9, 2021, nor will it change the type of equipment, number of construction personnel, or the status of any MMRCP pre-construction requirements described in NTP-1. A Grading Permit (or Grading Permit addendum) will be acquired from the City of San Marcos in order to perform grading at Location 78. As required in Section 2.0 of the MMRCP, all permits received will be submitted to the CPUC prior to the commencement of permitted activities.

MPR-6 Request for Approval

SDG&E respectfully requests approval of MPR-6 for the relocation of Location 78 and its associated work area by February 11, 2022. MPR-6 activities would take place in accordance with conditions outlined in the CPUC's NTP-1 approval letter, as well as requirements in the IS/MND and MMRCP. Should you have any questions or need additional information, please do not hesitate to contact me at (619) 857-8922 or by email at wyee@sdge.com.

Sincerely,

William R. Yee

William Yee

TL6975 Environmental Project Manager

cc: Dave Davis, ESA Associates
Melinda Kimble, SDG&E
Josh Taylor, KP Environmental

ATTACHMENT A
MPR-6 Form



TL6975 San Marcos to Escondido 69 kV Project CPUC Minor Project Refinement Form

Minor project refinements are strictly limited to changes that will not trigger an additional permit requirement (except local government ministerial permits and associated requirements), do not substantially increase the severity of a previously identified significant impact based on criteria used in the IS/MND, create a new significant impact, are located within the geographic boundary of the study area of the IS/MND, and that don't conflict with any mitigation measure or applicable law or policy.

Date Requested: February 7, 2022

Report No.: 6

Date Approved: TBD

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): The Minor Project Refinement No. 6 (MPR-6) work area is located entirely within SDG&E's transmission line right-of-way (ROW).

Location/Milepost: The MPR-6 work area is located in the City of San Marcos north of San Elijo Road.

Land Use/Vegetative Cover: The land use and vegetative cover for the proposed MPR-6 work area is estimated as follows:

- 6,090 square feet (0.14 acre) in coastal sage scrub (CSS), disturbed and bare ground.

Sensitive Resources: There is CSS present within the MPR-6 work area. See resource discussions below.

Modification From:

<input type="checkbox"/> Permit	<input type="checkbox"/> Plan/Procedure	<input type="checkbox"/> Specification	<input type="checkbox"/> Drawing
<input type="checkbox"/> Mitigation Measure	<input checked="" type="checkbox"/> Other:		

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-6 for the relocation of Location 78 and its associated work area to facilitate wire installation operations associated with Segment 3 of the TL6975 San Marcos to Escondido Project (Project). Following the approval of Notice to Proceed No. 1 (NTP-1), it was discovered that a non-Project related structure was installed in place of Location 78, resulting in the overhead alignment in this junction to be reconfigured. See **Attachment B, MPR-6 Figure** and **Attachment C, MPR-6 Site Photographs**, for an overview of the proposed MPR-6 work area.

Grubbing of vegetation and grading will be required within the MPR-6 permanent impact area in order to create a level construction work area and work pad. Grubbing and grading would be performed with a dozer, backhoe or similar equipment. Vegetation trimming will also take place within the temporary portion of the MPR-6 work area. Vegetation trimming would be completed with both hand tools and a skid steer with a mower deck and would be no less than 4 inches above the

ground to maintain the root structure and seed bank per the SDG&E Natural Communities Conservation Plan (NCCP) Operational Protocol No. 36 (Section 7.1).

The MPR-6 work area would be accessed from the existing access road entrance off San Elijo Road. The non-jurisdictional concrete v-ditch drainage that runs parallel to the MPR-6 work area will be protected by trench plates and Stormwater Pollution Prevention Plan (SWPPP) best management practices (BMPs) during construction. A concrete brow ditch will be installed on the upslope boundary of the work pad to allow for proper drainage and it would tie into the existing non-jurisdictional concrete v-ditch. The work pad would consist of compacted Class 2 base. A Grading Permit (or Grading Permit addendum) issued by the City of San Marcos would include the grading and design of the work pad and brow ditch feature within the permanent portion of the MPR-6 work area. A copy of the Grading Permit would be provided to the CPUC prior to starting any activities covered under the permit in accordance with Section 2.0 of the Mitigation Monitoring, Reporting and Compliance Program (MMRCP). In accordance with the SWPPP, the temporary disturbance associated with the MPR-6 work area will be stabilized with a native seed mix.

Describe how project refinement deviates from current project. Include photos.

Original Condition: The MPR-6 work area is located within the geographic study area of the IS/MND and is adjacent to approved work areas; therefore, it has been previously analyzed. Since the Project was originally designed, a non-Project related structure was installed in the original position of Location 78, which resulted in the relocation of Location 78.

Justification for Change:

A regulator station was installed in the location where Location 78 was originally approved in mid-2020, which resulted in the reconfiguration of the overhead alignment and the relocation of Location 78. Grading will be required to create a level construction work area and permanent work pad for the new position of Location 78.

Location 78 must be installed and the associated overhead distribution line must be reconfigured before the Segment 3 reconductoring can occur between Locations 70 and 85. This makes Location 78 a critical component of Segment 3 activities.

Maps & Figure: Refer to **Attachment B, MPR-6 Figure**, for a map of the proposed MPR-6 work area. Refer to **Attachment C, MPR-6 Site Photographs**, for pictures of the current conditions of the MPR-6 work area.

Environmental Impact: Utilization of the MPR-6 work area would not substantially increase the severity of any impacts disclosed within the IS/MND; would not result in alteration to Applicant Proposed Measures (APMs) or existing Mitigation Measures (MMs); would not require new mitigation measures; and would not require an additional discretionary approval by the CPUC. No special-status species were identified within the proposed MPR-6 work area.

MPR-6 would result in 0.07 acre of habitat impact. Combined with the 0.46 acre of habitat impacts from MPRs 1-5, this results in a total of 0.53 acre of impacts deducted from the "habitat impact limit" set aside when the Project was approved, and 13.684 acres are remaining. Therefore, MPR-6 impacts would not cause the available acreage in the "habitat impact limit" to be exceeded.

MPR-6 would result in 0.13 acre of credit drawdown from the SDG&E mitigation bank. Combined with the 0.39 acre of mitigation credits resulting from MPRs 1-5, this results in a total of 0.52 acre of mitigation credits that could be withdrawn from the mitigation bank, and 113.56 acres are remaining. Therefore, MPR-6 impacts would not cause the available mitigation credits to be exceeded.

Attachment D, Habitat Impact Limit and Mitigation Accounting, documents the total habitat impact and balance of the “habitat impact limit” as well as the total drawdown of mitigation credits resulting from the Project thus far.

According to the Project’s Cultural Resources Monitoring Plan (CRMP), the proposed MPR-6 work area is within an area determined to have a high potential for buried archaeological deposits. However, MPR-6 activities would not substantially increase the severity of impacts to cultural resources as ground disturbance was already anticipated in the vicinity of the work area (Location 78 was moved approximately 85 feet). Cultural and Native American monitoring will occur within the MPR-6 work area during vegetation trimming and ground disturbing activities such as grading.

Impacts to type of land cover resulting from MPR-6 are estimated in the table below:

	Low-Quality Coastal Sage Scrub	Disturbed Habitat	Bare Ground	Total
Temporary	268 sf	1,072 sf	0 sf	1,340 sf (0.03 acre)
Permanent	2,850 sf	1,663 sf	237 sf	4,750 sf (0.11 acre)
Total:	3,118 sf (0.07 acre)	2,735 sf (0.06 acre)	237 sf (>0.01 acre)	6,090 sf (0.14 acre)

Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as the proposed MPR-6 work area is located within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

<u>Resources:</u>						
Biological	<input type="checkbox"/>	No Resources Present	<input checked="" type="checkbox"/>	Resources Present	<input type="checkbox"/>	N/A, Change would not affect resources
Previous Biological Survey Report Reference:						
Biological resources along the Project alignment were studied, reviewed, and documented as part of the TL6975 Project’s Proponent’s Environmental Assessment (PEA). Biological Resources were also analyzed within the CPUC-conducted CEQA review process. A pre-construction survey was conducted for the MPR-6 work areas on December 28, 2021. Consistent with Appendix E of the IS/MND, low-quality CSS is present within the proposed MPR-6 work area. The Project biologist verified that the current condition is consistent with the results provided in previous biological studies. There were no special-status plant or animal species observed during the pre-construction survey. Biological monitoring will take place during vegetation trimming, grubbing and ground-disturbing activities in accordance with APM BIO-8.						
Cultural	<input checked="" type="checkbox"/>	No Resources Present	<input type="checkbox"/>	Resources Present	<input type="checkbox"/>	N/A, Change would not affect resources
Previous Cultural Survey Report Reference:						
Cultural resources within the Project’s study area (including the MPR-6 work area) were studied, reviewed, and documented as part of the Project’s PEA. These resources were also discussed within the CPUC-conducted CEQA review process (see the Project’s IS/MND, Section 3.5). Pedestrian surveys were completed for the Project’s study area in February 2015 for the PEA. There are no known sensitive cultural resources within the MPR-6 work area and no cultural resources were recorded during the pedestrian survey. The MPR-6 work area is located in an area determined to have a high potential for archaeological deposits. There is also a cultural						

Environmentally Sensitive Area (ESA) southeast of the MPR-6 work area, on the opposite side of San Elijo Road. Therefore, cultural and Native American monitoring will take place for vegetation trimming, grubbing and ground-disturbing activities in accordance with the CRMP.

Disturbance Acreage Changes: Yes No

MPR-6 would result in 1,340 square feet (0.03 acre) in temporary impacts and 4,750 square feet (0.11 acre) of permanent impact resulting in a total of 6,090 square feet (0.14 acre) of additional disturbance to the Project as approved.

It should be noted, the total size of the permanent disturbance area associated with Location 78 is 6,023 square feet (0.14 acre); however, the permanent work area for the original Location 78 (1,273 sf or 0.03 acre) was deducted as to not double-count overlapping impacts. Therefore, the proposed MPR-6 permanent work area would result in a new permanent impact of 4,750 square feet (0.11 acre). The temporary impacts proposed in MPR-6 do not overlap with the original temporary impacts for Location 78.

Disturbance acreage changes are summarized as follows:

Location	Temporary Impact	Permanent Impact	Total
Location 78 (Original)	2,012 sf	1,273 sf	3,285 sf (0.08 acre)
Location 78 (New in MPR-6)	1,340 sf	4,750 sf	6,090 sf (0.14 acre)

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Geology, Soils, Seismicity, Paleontological Resources	<input checked="" type="checkbox"/> Y	<p>Although MPR-6 would involve additional ground disturbance, the ground-disturbing activities for Location 78 analyzed and approved in the IS/MND and NTP-1, (direct-bury pole installation, grading for pad) will still take place in approximately the same area. For this reason and the reasons described below, MPR-6 activities are not expected to result in new significant impacts or a substantial increase in severity of any previously identified impacts to geology, soils, or paleontological resources analyzed in the Project's IS/MND, Section 3.7.</p> <p>As stated in Section 3.7.1 of the IS/MND, Segment 3 has a general susceptibility for landslides as the topography of the region has areas of varying slope. However, WA 78 is located in an area that is relatively flat and is not anticipated to contribute to the risk of landslides. Vegetation trimming within the temporary portion of the MPR-6 work area would occur to a height of 4 inches above the ground. Therefore, the root system would contribute to stabilizing the soil.</p> <p>Grubbing and clearing of vegetation would occur within the permanent impact area of 4,750 square feet for Location 78. Grading will also take place as part of the construction of the permanent work pad. Erosion control BMPs would be incorporated in accordance with the SWPPP and the Erosion Control Plan</p>
	<input type="checkbox"/> N	

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
		<p>attached to the Grading Permit. Because Segment 3 is characterized by factors such as corrosive soils and varying slope, a supplemental Geotechnical Report was required by MM GEO-1, which was approved by the CPUC on May 18, 2021. The design recommendations for Location 78 contained in the supplemental report would be implemented and would still apply due to Location 78 being located in the same general area with similar geologic conditions, approximately 85 feet from the original location of the pole. In addition, the proposed MPR-6 work area is not located in a paleontologically sensitive area per the Project's Paleontological Resources Monitoring and Mitigation Plan (PRMMP). In addition, a concrete brow ditch would be installed on the upslope side of the work pad to allow proper drainage and prevent erosion and siltation.</p> <p>Accordingly, MPR-6 would not create any new geologically-related hazard not previously disclosed in the Project's IS/MND, Section 3.7. Following the use of the MPR-6 work area, the site will be stabilized in accordance with the SWPPP.</p>
Agency Consultation?	<input checked="" type="checkbox"/> Y	A Grading Permit issued by the City of San Marcos will be required prior to performing any earth-moving work within the MPR-6 permanent work area.
	<input type="checkbox"/> N	
Hazardous Materials and Waste	<input type="checkbox"/> Y	There are no new facilities or significantly different activities being proposed in MPR-6 that were not previously analyzed in the IS/MND, Section 3.9. Accordingly, utilization of the MPR-6 work area would not require any new potentially hazardous materials to be used and would not create any new hazardous waste that could expose the public to hazards not previously disclosed in the Project's IS/MND. All activities will be performed in accordance with the Project's Health and Safety Plan (APM HAZ-1) as well as the Soil and Dewatering Management Plan (MM HAZ-1).
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-6 would not require agency consultation relating to hazards or hazardous materials.
	<input checked="" type="checkbox"/> N	
Hydrology / Water Quality	<input checked="" type="checkbox"/> Y	<p>There is a concrete v-ditch drainage that runs parallel to the MPR-6 work area. The drainage ditch would be protected by trench plates and SWPPP BMPs as-needed during construction activities. The drainage is non-jurisdictional, and no jurisdictional aquatic resources would be impacted by MPR-6 activities.</p> <p>A concrete brow ditch would be installed on the upslope side of the work pad to allow proper drainage and prevent erosion and siltation (See Attachment B, MPR-6 Figure). The brow ditch would connect to the existing concrete v-ditch. The work pad would be constructed of compacted Class 2 base to allow for permeation into the soil. This would not impede or redirect flood flow, conflict with any local water quality control plans or otherwise result in new significant impacts or a substantial increase in severity of any previously identified</p>
	<input type="checkbox"/> N	

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
		<p>impacts to hydrology and water quality that would be different from the impacts assessed in the Project's IS/MND, Section 3.10.</p> <p>Limiting vegetation trimming to no less than 4 inches within the temporary impact area and keeping the root structure intact would also reduce the likelihood of erosion within the MPR-6 work area.</p>
Agency Consultation?	<input checked="" type="checkbox"/> Y	A Grading Permit issued by the City of San Marcos will be required prior to installing the brow ditch feature.
	<input type="checkbox"/> N	
Cultural Resources	<input checked="" type="checkbox"/> Y	Vegetation trimming will take place within the temporary portions of the MPR-6 work areas, and will be cut to 4 inches. The permanent portion of the Location 78 work area will be grubbed and graded prior to the start of the direct-bury pole installation at Location 78.
	<input type="checkbox"/> N	Review of the Project's previous cultural resources survey reports prepared for the PEA determined there are no known sensitive cultural resources within the MPR-6 work area. However, the MPR-6 work area is located within an area determined to have a high potential for archaeological deposits. There is also a cultural ESA southeast of the MPR-6 work areas, on the opposite side of San Elijo Road. Therefore, cultural monitoring would take place during vegetation trimming and ground-disturbing activities pursuant to the CRMP. Project impacts would remain similar to those disclosed within the Project's IS/MND, Section 3.5.
Agency Consultation?	<input type="checkbox"/> Y	MPR-6 would not require agency or tribal consultation in relation to cultural resources.
	<input checked="" type="checkbox"/> N	
Tribal Cultural Resources	<input checked="" type="checkbox"/> Y	As stated in the previous section, there are no known sensitive cultural resources (including tribal cultural resources) within the MPR-6 work area. However, the proposed MPR-6 work area is located in an area determined to have a high potential for archaeological deposits that could include tribal cultural resources. Native American monitoring would take place during vegetation trimming and ground disturbing activities in accordance with the CRMP. Impacts would be similar to those disclosed within the Project's IS/MND, Section 3.18.
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-6 would not require agency or tribal consultation in relation to tribal cultural resources.
	<input checked="" type="checkbox"/> N	
Traffic and Circulation	<input type="checkbox"/> Y	The relocation of Location 78 and its work area would not require traffic control and would not affect traffic control on public roads. MPR-6 activities would not involve a schedule extension or significantly different construction activities or equipment that would create a change to the number of construction-related trips on local roadways that would not be accounted for in the IS/MND, Section 3.17 and NTP-1.
	<input checked="" type="checkbox"/> N	
	<input type="checkbox"/> Y	

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Agency Consultation?	<input checked="" type="checkbox"/> N	MPR-6 would not require agency consultation relating to traffic and circulation.
Air Quality	<input type="checkbox"/> Y	MPR-6 would not result in new significant impacts or a substantial increase in the severity of impacts as analyzed and disclosed within the Project's IS/MND, Section 3.3, as there is no new construction equipment or significantly different activities proposed as part of this MPR-6 request. In addition, the same requirements regarding fugitive dust mitigation that are described in the Project's IS/MND would apply to the MPR-6 work area. These requirements include but are not limited to limiting vehicle speed to 15 miles per hour on work sites, regular watering of work sites to mitigate fugitive dust (NCCP Section 7.1 Operational Protocol No. 39) and restrictions on fugitive dust and air quality found in the San Diego Air Pollution Control District (SDAPCD) Regulation IV. Therefore, MPR-6 would not affect air quality or emissions in a manner substantially different from the impacts assessed as part of the Project's IS/MND.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-6 would not require agency consultation relating to air quality.
	<input checked="" type="checkbox"/> N	
Noise and Vibration	<input type="checkbox"/> Y	MPR-6 would not result in new significant impacts or a substantial increase in severity of any previously identified impacts to noise and vibration that were already analyzed in the Project's IS/MND, Section 3.13. There are no new activities proposed as part of this MPR-6 request that would cause a substantial increase in construction noise, and the proposed MPR-6 work areas are not within 100 feet of a sensitive receptor. All activities performed within the proposed MPR-6 work areas would take place in accordance with the Construction Noise Reduction and Mitigation Plan (CNRMP).
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-6 would not require agency consultation relating to noise and vibration.
	<input checked="" type="checkbox"/> N	
Aesthetics/ Visual Resources	<input checked="" type="checkbox"/> Y	As described in Section 3.1 of the IS/MND, the area in which the Project is located has numerous existing above-ground electric utility components. This is also true for the junction in which Location 78 is located, where several existing utility structures are in close proximity. MPR-6 would involve an increase in the size of permanent disturbance associated with Location 78 due to its relocation; however, this change will not require removal of any landscaped or screening vegetation. The overall visual sensitivity to this adjustment would be low and would not be expected to result in a substantial impact to the existing visual character or quality of public views beyond what was analyzed in the IS/MND, Section 3.1. In addition, the MPR-6 work area is not located within a Key Observation Point (KOP), scenic vista, or other scenic resource identified in the IS/MND. Therefore, MPR-6 would not result in a
	<input type="checkbox"/> N	

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
		substantial increase in severity or a new significant impact from those analyzed and disclosed within the Project's IS/MND.
Agency Consultation?	<input type="checkbox"/> Y	MPR-6 would not require agency consultation relating to visual resources.
	<input checked="" type="checkbox"/> N	
Vegetation and Wildlife	<input checked="" type="checkbox"/> Y	<p>MPR-6 would result in 3,118 square feet of impacts to CSS. Vegetation trimming will be required within the temporary portion of the MPR-6 work area. Trimming will be performed with both hand tools and a skid steer with a mower deck and vegetation would be trimmed to no less than 4 inches above the ground per the SDG&E NCCP Operational Protocol No. 36 (Section 7.1) to maintain the root structure and seed bank. The vegetation within the permanent portion of the MPR-6 work area will be grubbed using a dozer, backhoe or similar equipment.</p> <p>MPR-6 would result in 0.07 acre of habitat impact. Combined with the 0.46 acre of habitat impact from MPRs 1-5, this results in a total of 0.53 acre of impacts deducted from the "habitat impact limit" set aside when the Project was approved, and 13.684 acres are remaining. Therefore, MPR-6 impacts would not cause the available acreage in the "habitat impact limit" to be exceeded.</p> <p>MPR-6 would result in 0.13 acre of credit drawdown from the SDG&E mitigation bank. Combined with the 0.39 acre of mitigation credits resulting from MPRs 1-5, this results in a total of 0.52 acre of mitigation credits that could be withdrawn from the mitigation bank, and 113.56 acres are remaining. Therefore, MPR-6 impacts would not cause the available mitigation credits to be exceeded.</p> <p>Attachment D, Habitat Impact Limit and Mitigation Accounting, documents the total habitat impact and balance of the "habitat impact limit" as well as the total drawdown of mitigation credits resulting from the Project thus far.</p> <p>MPR-6 would not result in any new significant impacts or a substantial increase in severity of any previously identified impacts to biological resources. A biological monitor would be present during vegetation trimming, grubbing and ground-disturbing activities per APM BIO-8. Although no new or altered APMs or MMs would be required, the following APMs and MMs would be implemented for MPR-6 activities, as well as the requirements in the NCCP:</p> <ul style="list-style-type: none"> • APM BIO-1 • APM BIO-2 • APM BIO-3 • APM BIO-4 • APM BIO-6 • APM BIO-7 • APM BIO-8
	<input type="checkbox"/> N	

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
		<ul style="list-style-type: none"> • APM BIO-9 • MM BIO-1: Project Compliance with the Federal and California Endangered Species Acts. • MM BIO-2: Establishment of Cylindrical Construction Buffers
Agency Consultation?	<input type="checkbox"/> Y	MPR-6 would not require agency consultation relating to vegetation and wildlife.
	<input checked="" type="checkbox"/> N	
Wildfire	<input type="checkbox"/> Y	As stated within the IS/MND, the area in which the MPR-6 work area is located within a CPUC Tier 2 High Fire Threat District (HFTD). There are no significantly new activities proposed, extension in work schedule, or increase in equipment or personnel required as a result of MPR-6. SDG&E and its contractors will conduct all activities in accordance with the Project's Construction Fire Prevention Plan and MM WIL-1, including restrictions and requirements for vegetation trimming and grubbing. Therefore, MPR-6 would not result in new significant impacts or a substantial increase in severity of any previously identified impacts to wildfire that were already analyzed in the Project's IS/MND, Section 3.20.
	<input checked="" type="checkbox"/> N	
Agency Consultation	<input type="checkbox"/> Y	MPR-6 would not require agency consultation relating to wildfire.
	<input checked="" type="checkbox"/> N	

Approvals	Date	Name (print)	Signature	
San Diego Gas and Electric Project Manager	2/11/2022	Melinda Kimble		<input checked="" type="checkbox"/> Reviewed
San Diego Gas and Electric Environmental Project Manager	2/11/2022	William Yee		<input checked="" type="checkbox"/> Reviewed
CPUC Project Manager	2/10/2022	Trevor Pratt		<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Approved with conditions (see below) <input type="checkbox"/> Denied
For CPUC Compliance Manager Use Only				
<input type="checkbox"/> Refinement Approved	<input type="checkbox"/> Refinement Denied		<input type="checkbox"/> Beyond Authority	

Conditions of Approval or Reason for Denial:

Prepared by: _____ Date: _____

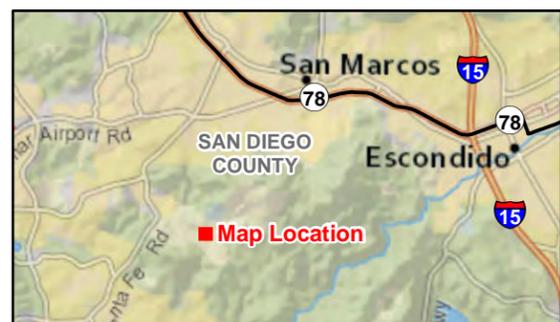
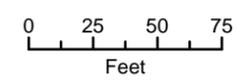
ATTACHMENT B
MPR-6 Figure

TL6975 SAN MARCOS to ESCONDIDO PROJECT

MPR-6 Figure 1
Structure Location 78
San Diego County, CA

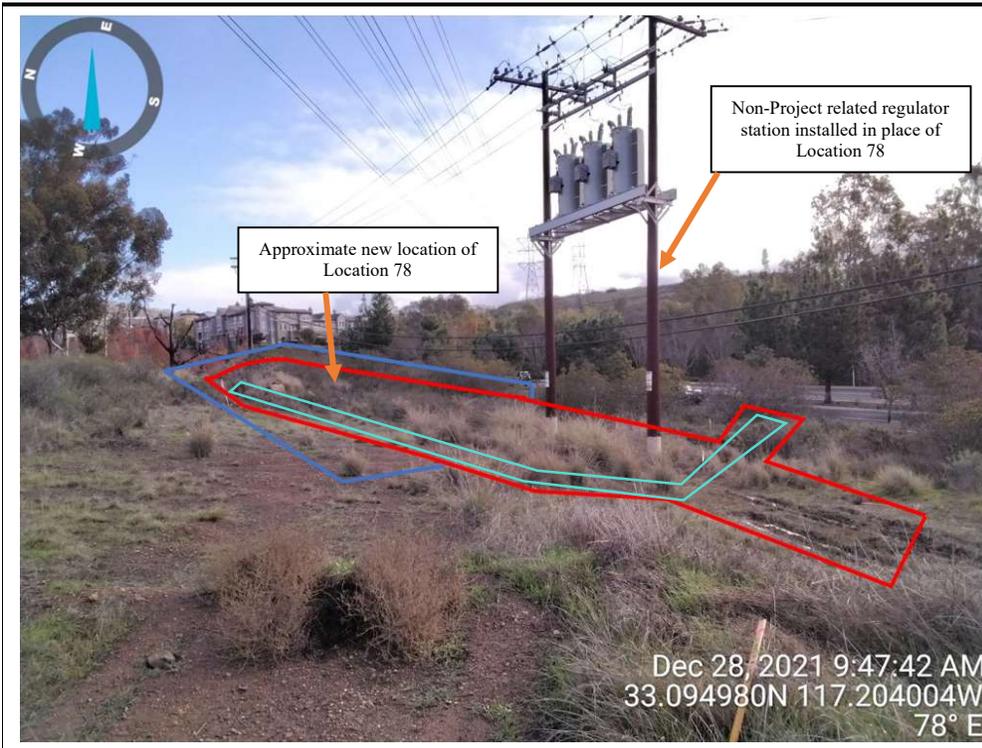
LEGEND

- Existing 138kV Transmission Line
- State Highway
- Proposed Project**
- Replace Existing with Pier Foundation
- Replace Existing with Direct Bury
- Overhead Work
- ✕ Remove From Service
- Guard Structures
- Segment 3 - Reconductor / Re-energize
- - - - - Existing Access Road
- Temporary Work Area
- Permanent Work Area or Grading Impacts
- Staging Yard
- Existing ROW
- MPR-6 Component**
- Additional Permanent Work Area
- Additional Temporary Work Area
- Additional Permanent Brow Ditch



ATTACHMENT C
MPR-6 Site Photographs

MPR-6 PHOTO LOG



Photograph 1:
View of the MPR-6 temporary work area in dark blue, permanent work area in red and the approximate location of the brow ditch feature in teal. Facing: E



Photograph 2:
View of the MPR-6 temporary work area in dark blue, permanent work area in red and the approximate location of the brow ditch feature in teal. Facing: NE

MPR-6 PHOTO LOG



Photograph 3:

View of the MPR-6 temporary work area in dark blue, permanent work area in red and the approximate location of the brow ditch feature in teal. Facing: S

Dec 28, 2021 9:51:17 AM
33.095259N 117.203398W
199° S

ATTACHMENT D
Habitat Impact Limit and Mitigation Accounting



TO: Trevor Pratt
DATE: February 4, 2022
FROM: William Yee
SUBJECT: Attachment D to MPR-6: Accounting for the Mitigation Credits and “Habitat Impact Limit” under the SDG&E Low Effect Habitat Conservation Plan

The information provided in this memo documents the accounting for two separate conditions of the SDG&E 2017 LE-HCP or Plan in accordance with Mitigation Measure BIO-1 for the TL6975 Project, which states the following:

***Mitigation Measure BIO-1: Project Compliance with the Federal and California Endangered Species Acts.** Prior to approval of the Notice to Proceed (NTP), SDG&E shall provide CPUC with a written commitment to implement its 1995 Subregional Natural Community Conservation Plan (NCCP) or 2017 Low Effect HCP (LEHCP), including proof that sufficient mitigation/take credits are assigned to the Project to cover potential impacts on all special-status plant and animal species present in the BSA or having moderate or high potential to occur in the biological study area (BSA).*

If there are not sufficient mitigation/take credits available in the NCCP or LEHCP at the time of NTP approval, then prior to the commencement of Project construction, SDG&E shall secure take authorization from the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW), as appropriate, for all federal and State-listed special-status plant and animal species present in the BSA or having moderate or high potential to occur in the BSA that are impacted by the Project. The conditions of these authorizations shall be equally or more effective than the protocols and practices included in the NCCP/LEHCP. SDG&E shall provide the CPUC with copies of these authorizations to show that compliance with permitting conditions would be equal to or more effective than the approved NCCP/LEHCP protocols and practices. SDG&E shall also submit to CPUC any monitoring reports, incident reports, etc., required by USFWS and/or CDFW when submitted to those agencies.

There are two conditions or terms of use for the SDG&E 2017 LE-HCP and the accompanying ESA Section 10(a)(1)(A) “Take” permit (Permit). One condition is the establishment of a mitigation bank or the purchase of high-quality habitat for the sole purpose of conserving listed species. The acreage is referred to as credits and these credits are debited to mitigate for actual impacts as projects are realized. The Natural Communities Conservation Plan (NCCP) and LE-HCP have combined mitigation credits of 117.008 acres as reported in the 2020 Annual Report (see **Table 1**). An Annual Report is a requirement of the Plan and submitted to the wildlife agencies the year following the reporting year.

It is important to note, the accounting provided herein is an estimate and the Post-Construction Survey Report for TL6975 will provide actual mitigation credits and the actual impacts to habitat to be subtracted from the mitigation bank and the “habitat impact limit” respectively.

Table 1 below is a table in the 2020 Annual Report and it was provided in the letter to the CPUC as Attachment C to the Notice to Proceed No. 1 (NTP-1) on June 18, 2021 (included). As required by the Plan, the TL6975 San Marcos to Escondido Project has submitted a Pre-activity Survey Report to the wildlife agencies reporting approximately 2.93 acres of estimated mitigation credits that could potentially be withdrawn as a result of the Project as approved (see **Table 2**).

Table 1. Accounting of Mitigation Credits as reported in LE-HCP Annual Report 2020

NCCP/LE-HCP Mitigation Bank		
Year	Remaining Mitigation Bank (Acres)	Deduction (Acres) Annually
2017*	195.783	0.000
2017 (NCCP)	191.320	4.463
2017 (LE-HCP)	191.307	0.013
2017 (Enhancement Program)	191.477	9.830
2018 (NCCP)	169.375	12.102
2018 (LE-HCP)	169.112	0.263
2019 (NCCP)	168.781	0.331
2019 (LE-HCP)	168.484	0.297
2020 (NCCP)	168.386	0.098
2020 (Enhancement Program)	151.543	16.843
2020 (LE-HCP)	117.008	34.535

*SDG&E purchased 280 acres of mitigation in 1995 as a part of the NCCP permit; the mitigation parcels are referred to as the Otay Lakes and Willow Glen Mitigation Banks. In 2015, SDG&E purchased an additional 114 acres of mitigation, often referred to as the Cielo Property. This purchase has been reflected in SDG&E's remaining mitigation credits from 2017 onwards.

Table 2 below provides the Project impacts to be mitigated as estimated (in gray) under “Project as approved” and the impacts to be mitigated resulting from or being proposed in the Minor Project Refinements (MPRs). As we continue to request MPRs for approval, we will be adding to this table and adjusting the totals. MPR-6, as proposed, would result in 0.13 acre of mitigation credit drawdown. Combined with the 0.39 acre of mitigation credits from MPRs 1-5, this results in a total of 0.52 acre of mitigation credits that could be withdrawn from the mitigation bank. With the total mitigation credits of 117.008 acres being available in 2020 (see **Table 1**), the withdrawal of 3.45 acres would result in a balance of 113.56 acres and SDG&E's coverage of mitigation credits would remain sufficient to support the Project.

Table 2. Accounting of Mitigation Credits Resulting from MPRs

MPRs	Total Permanent Impacts (sf)	Total Permanent Impacts Credit Withdrawal (sf)	Total Temporary Impacts (sf)	Total Temporary Impacts Credit Withdrawal (sf)	Total Temporary Impacts for Enhancement (sf)	Mitigation Credits Subtotal in square feet (sf)	Totals in Acres (ac)	Estimated Remaining Acreage Mitigation Credits (From 117.008 acres)
Project as approved	55,794	88,392	47,794	4,274	34,996	127,662	2.93	114.08
MPR-1	-	-	11,250	-	11,250	11,250	0.26	113.82
MPR-2	-	-	3,875*	-	-	0	0	113.82
MPR-3	-	-	1,700	-	1,700	1,700	0.04	113.78
MPR-4	-	-	1,183*	-	750	750	0.02	113.76
MPR-5	1,100	2,200	710	-	710	2,910	0.07	113.69
MPR-6 (Proposed)	2,850	5,700	268*	-	-	5,700	0.13	113.56
Total	59,744	96,292	66,780	4,274	49,406	149,972	3.45	113.56

*Mitigation credits are not withdrawn when the area of impact is outside of a defined Preserve or outside of Preserve quality habitat if a defined Preserve is not designated. In addition, if impacts at one site are less than 500 square feet, mitigation is not required. Land cover such as bare ground, landscaping, disturbed vegetation, etc. does not require mitigation or take credits.

The other condition of the Plan and Permit is the accounting of impacts allowed under the 10(a)(1)(A) “Take” permit. A maximum of 60 acres of Covered Species habitat can be temporarily or permanently impacted under the Permit for this LE-HCP, otherwise referred to as the “habitat impact limit.”

Table 3 below is a table in the 2020 Annual Report and it was provided in the letter to the CPUC as Attachment C to the Notice to Proceed No. 1 (NTP-1) on June 18, 2021 (included). In this letter, it was documented that 34.867 acres remained of the “habitat impact limit” as documented in the 2020 Annual Report. In addition, SDG&E estimates an additional 17.653 acres of impacts will be applied in 2021 pending final calculations; therefore, this leaves an estimated 17.214 acres remaining for 2022. For the TL6975 project, it was estimated in the Initial Study / Mitigated Negative Declaration (IS/MND) that 2.5 acres of habitat would be impacted, but to account for unforeseen circumstances, an additional 0.5 acre was included to bring the total to three acres. It is important to note that all staging yards and work areas, regardless of whether they are being used or not, are included in the Project’s estimated impact total of three acres (See **Table 4**).

Table 3. Accounting of “Habitat Impact Limit” as reported on an Annual Basis

LE-HCP Impact Bank		
Year	Remaining Mitigation Bank (Acres)	Deduction (Acres) Annually
2016	60.00	0.000
2017	59.801	0.199
2018	58.090	1.711
2019	56.462	1.628
2020	34.867	21.595

Table 4 below provides the Project impacts to habitat as estimated (in gray) under “Project as approved” and the impacts to habitat resulting from or being proposed in the Minor Project Refinements (MPRs). As we continue to request MPRs for approval, we will be adding to this table and adjusting the totals. MPR-6 as proposed would result in 0.07 acre of habitat being impacted. Combined with the 0.46 acre of habitat impact from MPRs 1-5, this results in a total of 0.53 acre of impacts deducted from the “habitat impact limit” and a balance of 13.684 acres remaining. Therefore, the MPR-6 impacts would not cause the available acreage to be exceeded, and thus SDG&E’s coverage for the habitat impact limit would remain sufficient to support the Project.

Table 4. Accounting of “Habitat Impact Limit” Deductions Resulting from MPRs

MPR	Coastal Sage Scrub (CSS) (Acres)	Coast Live Oak Woodland (CLOW) (Acres)	Southern Maritime Chaparral (SMC) (Acres)	Eucalyptus Woodland (Acres)	Non-native Grassland (Acres)	Additional Habitat Impacts Added for Unforeseen Circumstances (Acres)	Total Habitat Impacts Set Aside for TL6975 (Acres)	MPR Habitat Impact Total (Acres)	Estimated Remaining Acreage in Habitat Impact Limit (From 17.214 acres)
Project as Approved	1.6	0	0.7	0.1	0.1	0.5	3.00	-	14.214
MPR-1	0.26	-	-	-	-	-	-	0.26	13.954
MPR-2	0.09	-	-	-	-	-	-	0.09	13.864
MPR-3	0.02	0.02	-	-	-	-	-	0.04	13.824
MPR-4	0.01	-	0.02	-	-	-	-	0.03	13.794
MPR-5	0.04	-	-	-	-	-	-	0.04	13.754
MPR-6 (Proposed)	0.07	-	-	-	-	-	-	0.07	13.684
Total:	2.0	0.02	0.72	0.1	0.1	0.5	3.00	0.53	13.684



Angelique Hartman
Sr. Environmental Specialist
8326 Century Park Ct.
San Diego, California 92123
(619) 310-1999
AHartman2@SDGE.com

6/18/21

Mr. Trevor Pratt
Project Manager
California Public Utilities Commission
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102

RE: Mitigation Measure BIO-1: Proof of Mitigation Credits for the TL 6975 San Marcos to Escondido Project, San Diego, California

Dear Mr. Pratt:

On October 5, 2020, the California Public Utilities Commission (CPUC) voted to grant the San Diego Gas & Electric Company (SDG&E) a Permit to Construct (Decision D.20-09-034) for the San Marcos to Escondido Tie Line 6975 69 kV Project (Project) contingent upon implementation of the Mitigation Measures included as Attachment A of the Permit to Construct. Specifically, Mitigation Measure (MM) BIO-1 requires SDG&E to submit written commitment to utilize the SDG&E Subregional Natural Communities Conservation Plan (NCCP) or 5-Year Low Effect Habitat Conservation Plan (LEHCP) as take coverage under the State and Federal Endangered Species Acts and provide proof of sufficient mitigation credits under the NCCP and/or 5-year LEHCP. SDG&E is hereby submitting this letter and attachments as commitment to utilize the existing NCCP and 5-year LEHCP for incidental take and mitigation for modification of habitat.

Mitigation Measure BIO-1: Project Compliance with the Federal and California Endangered Species Acts

“Prior to approval of the Notice to Proceed (NTP), SDG&E shall provide CPUC with a written commitment to implement its 1995 Subregional Natural Community Conservation Plan (NCCP) or 2017 Low Effect HCP (LEHCP), including proof that sufficient mitigation/take credits are assigned to the Project to cover potential impacts on all special-status plant and animal species present in the BSA or having moderate or high potential to occur in the biological study area (BSA).

If there are not sufficient mitigation/take credits available in the NCCP or LEHCP at the time of NTP approval, then prior to the commencement of Project construction, SDG&E shall secure take authorization from the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW), as appropriate, for all federal and State-listed special-status plant and animal species present in the BSA or having moderate or high potential to occur in the BSA that are impacted by the Project. The conditions of these authorizations shall be equally or more effective than the protocols and practices included in the NCCP/LEHCP. SDG&E shall provide the CPUC with copies of these authorizations to show that compliance with permitting conditions would be equal to or more effective than the approved NCCP/LEHCP protocols and practices. SDG&E shall also submit to CPUC any monitoring reports, incident reports, etc., required by USFWS and/or CDFW when submitted to those agencies.”

NCCP and 5-Year LEHCP Take Coverage

SDG&E developed the 5-year LEHCP in 2017 and applied for a 5-year incidental take permit for 15 animal species and 22 plant species through the U.S. Fish and Wildlife Service (USFWS) pursuant to Section 10(1)(1)(B) of the Federal Endangered Species Act (FESA) in late 2016. The 5-year LEHCP is designed to support the continuation of activities covered by FESA Permit No. PRT-809637, which is the incidental take permit issued by the USFWS to SDG&E in December 1995. The 1995 permit is subject to SDG&E's compliance with its NCCP, which includes a 400-acre cap to the modification of habitat (Impact Bank). Under the 2017 LEHCP, SDG&E would continue to apply all of the conservation efforts, mitigation measures, and operational protocols implemented under the NCCP. The 5-year LEHCP, as approved under Permit No. TE26660C-0 and authorized in March 2017, would allow a maximum of 60 acres of habitat to be modified over a 5-year permit term. These two "Impact Banks" have been combined for the purpose of reporting in the NCCP and 5-year LEHCP Annual Reports.

The Project falls within the area governed by the SDG&E Subregional NCCP and the 2017 LEHCP. To address impacts on species covered under Federal Endangered Species Act (FESA) and California Endangered Species Act (CESA), both plans are authorized to mitigate with the remaining credits from the initial purchase of 280 acres as mitigation parcels in 1995 and the subsequent purchase of a 114-acre mitigation parcel referred to as the Cielo Property. These two "Mitigation Banks" have been combined for the purpose of reporting in the NCCP and 5-year LEHCP Annual Reports and are used here to demonstrate the availability of mitigation credits.

Proof of Available Mitigation Credits

As documentation of the availability of mitigation credits, the 2020 SDG&E 5-Year LEHCP Annual Summary Report (2020 Summary Report) is included as Attachment A. The first page of the 2020 Summary Report provides an account of the temporary and permanent impacts (area described using square feet) reported in 2020 according to the sensitive and non-sensitive habitat types, respectively. The following page (page 2 of 4) provides an account of mitigation credits withdrawn in 2020 (area described using square feet) resulting from temporary and permanent impacts to sensitive habitat. The last two pages of the Summary Report document the remaining mitigation credits and the remaining impacts under the Impact Cap (both in acres), for both the NCCP and 5-year LE-HCP respectively, beginning with the first year of the 5-year LEHCP. As shown on page 5 of the Summary Report, a total of 34.867 acres of mitigation credits remains under the 5-year LE-HCP mitigation cap. In addition, SDG&E estimates an additional 17.653 acres of impacts will be applied against the 5-year LE-HCP impact cap for projects that are pending final impact calculations (i.e., post construction reporting). This leaves an estimated 17.214 acres of impact credits remaining on the 5-year LE-HCP.

The TL6975 Project is estimated to result in approximately 3 acres of impacts to sensitive habitat, as defined by the NCCP, which would require mitigation count against the 5-year LE-HCP impact cap. Therefore, sufficient mitigation credits are available under existing SDG&E Incidental Take permits, utilizing the 5-year LE-HCP mitigation cap, to cover the TL6975 Project.

Closing

SDG&E hereby commits to providing incidental take coverage and mitigation for modification of habitat through implementation of the SDG&E NCCP and 5-year LEHCP, confirmed by the results of the now completed 2020 Summary Report (attached). The pre-construction requirements of MM BIO-1 are now fulfilled. Should you have any questions or need additional information, please do not hesitate to contact William Yee at (619) 857-8922 or by email at wye@sdge.com.

Sincerely,

William R. Yee for

Angelique Hartman
Sr. Environmental Specialist
Natural Resources – Environmental Services
San Diego Gas & Electric Company (SDG&E)

Attachment A: 2020 SDG&E 5-Year LEHCP Annual Summary Report

cc: Andrew Barnsdale, CPUC
Dave Davis, ESA
Melinda Kimble, SDG&E Project Manager
Bill Yee, SDG&E Environmental Project Manager
Glen Lubcke, SDG&E Natural Resources Team Lead
Tanzania Ware, SDG&E Environmental Programs Manager

ATTACHMENT A

SDG&E 2020 5-Year LE-HCP Annual Summary Report

**San Diego Gas and Electric Low-Effect Habitat
Conservation Plan
2020 Summary Report**



NCCP Summary 5 Year Permit Report

2020

Impacts by Habitat Type

Habitat Type	Temporary Impact (sq.ft.)	Permanent Impact (sq.ft.)
Big Sagebrush Scrub	3,362	318
Black Oak Forest	512	4
Buckwheat Scrub	2,830	488
Chaparral	11,053	617,373
Coast Live Oak Forest	582	174
Coast Live Oak Riparian Forest	575	2
Coastal Sage Scrub	55,712	2,882
Coastal Sage Scrub/Chaparral Mix	3,890	558
Coulter Pine Forest	0	370
Grassland	80,635	135,316
Mixed Oak/Coniferous Forest	2,790	560
Open Engelmann Oak Woodland	413	7
Open Oak Woodland	12,146	590
Riparian Forest	112	4
Riparian Scrub	2,094	40
Riparian Woodland	4,980	2
Southern Coastal Salt Marsh	309	0

Habitat Impacts Totals

	Square Feet	Acres
Temporary Impacts to Habitat	181,995	4.178
Permanent Impacts to Habitat	758,688	17.417
Total	940,683	21.595



NCCP Summary 5 Year Permit Report

2020

Mitigation by Credit Withdrawal

Temporary Impacts

Habitat Type	Credit Withdrawal (sq.ft.)
Big Sagebrush Scrub	0
Black Oak Forest	0
Buckwheat Scrub	0
Chaparral	694
Coast Live Oak Forest	0
Coast Live Oak Riparian Forest	0
Coastal Sage Scrub	0
Coastal Sage Scrub/Chaparral Mix	1,604
Coulter Pine Forest	0
Grassland	2,069
Mixed Oak/Coniferous Forest	0
Open Engelmann Oak Woodland	0
Open Oak Woodland	0
Riparian Forest	0
Riparian Scrub	0
Riparian Woodland	0
Southern Coastal Salt Marsh	0
Total (Sq ft):	4,367

Permanent Impacts

Habitat Type	Credit Withdrawal (sq.ft.)
Big Sagebrush Scrub	632
Black Oak Forest	8
Buckwheat Scrub	636
Chaparral	1,219,506
Coast Live Oak Forest	0
Coast Live Oak Riparian Forest	4
Coastal Sage Scrub	5,154
Coastal Sage Scrub/Chaparral Mix	1,084
Coulter Pine Forest	740
Grassland	270,476
Mixed Oak/Coniferous Forest	484
Open Engelmann Oak Woodland	14
Open Oak Woodland	1,176
Riparian Forest	0
Riparian Scrub	52
Riparian Woodland	4
Southern Coastal Salt Marsh	0
Total (Sq ft):	1,499,970

Mitigation Credit Withdrawal Total

	Square Feet	Acres
Temporary Impacts Credit Withdrawal	4,367	0.100
Permanent Impacts Credit Withdrawal	1,499,970	34.435
Total	1,504,337	34.535



NCCP Summary 5 Year Permit Report

2020

Mitigation Bank

Year	Remaining Mitigation Bank (Acres)	Deduction (Acres)
2017*	195.783	0.000
2017 (NCCP)	191.320	4.463
2017 (LE-HCP)	191.307	0.013
2017 (Enhancement Program Reporting '97-'11)	181.477	9.830
2018 (NCCP)	169.375	12.102
2018 (LE-HCP)	169.112	0.263
2019 (NCCP)	168.781	0.331
2019 (LE-HCP)	168.484	0.297
2020 (NCCP)	168.386	0.098
2020 (Enhancement Program Reporting '11-'19)	151.543	16.843
2020 (LE-HCP)	117.008	34.535

*SDG&E purchased 280 acres of mitigation in 1995 as a part of the NCCP permit; the mitigation parcels are referred to as the Otay Lakes and Willow Glen Mitigation Banks. In 2015, SDG&E purchased an additional 114 acres of mitigation, often referred to as the Cielo Property. This purchase has been reflected in SDG&E's remaining mitigation credits from 2017 onwards.



NCCP Summary 5 Year Permit Report

2020

Impact Bank

Year	Remaining Impact Bank (Acres)	Deduction (Acres)
2016	60.000	0.000
2017	59.801	0.199
2018	58.090	1.711
2019	56.462	1.628
2020	34.867	21.595