

Mitigation Measure Biology-6 Compliance Memo

Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project

January 2017

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TABLE OF CONTENTS

1.0	Introduction.....	1
1.1	Project Description.....	1
1.2	Project Location	1
2.0	Mitigation Monitoring, Compliance and Reporting Program	3
2.1	MM Biology-6: Compensatory Mitigation for Impacts to Habitat	3
3.0	Project Impacts	6
3.1	Project Impacts by Land Designation	6
4.0	SDG&E Subregional NCCP	7
4.1	SDG&E NCCP Agreements	7
4.2	SDG&E NCCP Mitigation.....	8
4.3	Credit Withdrawal from SDG&E’s Mitigation Bank	9
4.4	Restoration of Temporarily Impacted Areas.....	9
4.5	Compensatory Mitigation for Permanent Impacts	10
5.0	Summary.....	10
6.0	References.....	10

LIST OF TABLES

Table 1: Estimated Impact Comparison.....	6
Table 2: Approved Project Estimated Impacts	7

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1.0 INTRODUCTION

San Diego Gas & Electric (SDG&E) proposes to construct the Sycamore-Peñasquitos 230 Kilovolt (kV) Transmission Line Project (Project), a new transmission line that would replace existing, predominantly wood structures between the existing SDG&E Sycamore Canyon and Peñasquitos Substations. This memorandum fulfills the requirements of Mitigation Measure (MM) Biology-6 of the Project's Mitigation Monitoring, Compliance and Reporting Program (MMCRP), and summarizes how implementation of the SDG&E Subregional Natural Communities Conservation Plan (NCCP) will provide compensatory mitigation for impacts to habitat.

The MM Biology-6 Monitoring/Reporting Action requires SDG&E to provide documentation describing how compensatory mitigation requirements are satisfied through compliance with the NCCP. The NCCP's Implementing Agreement confirms that the mitigation, compensation, and enhancement obligations contained in the NCCP meet all relevant standards and requirements of the Federal Endangered Species Act (ESA), the California ESA (CESA), the California Fish and Game Code (FGC), the California NCCP Act, and the California Native Plant Protection Act with regard to SDG&E's activities in the Subregional Plan Area (SDG&E 1995a, 1995b). SDG&E will restore temporarily impacted areas to pre-construction conditions as described in a project-specific Habitat Restoration Plan and compensate for permanently impacted areas through off-site acquisition and preservation following the guidelines set forth in the NCCP, which generally includes site enhancement or credit withdrawal from a mitigation bank approved by United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and SDG&E.

1.1 PROJECT DESCRIPTION

The Project consists of the construction and operation of a new 230 kV transmission line between the existing Sycamore Canyon and Peñasquitos substations. The approximately 14.4-mile transmission line was identified in the Final Environmental Impact Report (FEIR) as the environmentally superior alternative (Alternative 5: Pomerado Road to Miramar Area North Combination Underground/Overhead) (CPUC 2016) and includes Minor Project Refinements approved by the CPUC.

1.2 PROJECT LOCATION

The Project alignment extends from the Peñasquitos Substation in the west to the Sycamore Canyon Substation on Marine Corps Air Station (MCAS) Miramar in the east, in San Diego County, California. The Project begins as an overhead alignment at the Peñasquitos Substation in the west and heads southwest through a mix of commercial development and open space until Carroll Canyon Road. At Carroll Canyon Road, the Project takes a turn east and follows Carroll Canyon Road as an underground alignment alongside Poway Creek. The underground alignment continues east through primarily commercial and industrial areas, crosses Interstate 15 underground through and existing bridge, follows Pomerado Road and Stonebridge Parkway, and then returns to an overhead position for approximately 0.5 mile before transitioning underground at a cable pole located approximately 1,250 feet north of the Sycamore Canyon Substation and then terminating within the existing Sycamore Canyon Substation. The Project is

located in the United States Geological Survey (USGS) *Del Mar* and *Poway* 7.5-minute quadrangles.

2.0 MITIGATION MONITORING, COMPLIANCE AND REPORTING PROGRAM

The MMCRP describes SDG&E's compliance obligations with mitigation measures that were adopted by the California Utilities Public Commission (CPUC) as conditions of Project approval and as described in the FEIR. At the time the FEIR was finalized (March 2016) it was not certain whether the NCCP would be used to mitigate impacts to sensitive habitat resources, so the MMCRP included mitigation measures that mostly parallel the NCCP requirements in the event the NCCP would not be used for mitigation (refer to Section 4.1.7.1 of the FEIR).

The mitigation measures were established to reduce potential impacts to biological resources for the Project to a less than significant level. As described in the Project FEIR, MM Biology-6 mitigates impacts to amphibian species (Impact Bio-3), reptile species (Impact Bio-4), sensitive natural communities (Impact Bio-8), and jurisdictional aquatic resources (Impact Bio-9). Since finalization of the FEIR, SDG&E has confirmed that the NCCP, in combination with applicable mitigation measures and a Habitat Restoration Plan that addresses mitigation for temporary impacts, will be used for mitigation of the Project's impacts to habitat. The NCCP and a project-specific Habitat Restoration Plan will satisfy the requirements of MM Biology-6. No impacts to jurisdictional aquatic resources are anticipated as a result of the Project.

2.1 MM BIOLOGY-6: COMPENSATORY MITIGATION FOR IMPACTS TO HABITAT

Language in the MMCRP was developed to provide guidance on compensatory mitigation and restoration in the event the NCCP would not be utilized for the Project.

MM Biology-6 Monitoring/Reporting Action states:

SDG&E shall provide documentation describing how these requirements are satisfied through compliance with the NCCP and/or prepare the following plans:

- *Restoration Plan*
- *Habitat Acquisition Plan*
- *Habitat Management Plan*

Plans or documentation shall be prepared to the approval of the CPUC, USFWS, CDFW, and City of San Diego.

MM Biology-6 Measure Text states:

SDG&E shall restore temporarily impacted areas to pre-construction conditions following construction according to the performance criteria described below and/or shall purchase/dedicate suitable habitat for preservation to off-set permanently impacted areas. Restoration of some vegetation communities in temporarily impacted areas may not be possible if those areas are subject to vegetation management to maintain proper clearance between transmission lines and vegetation, for example. In those instances, the mitigation shall consist of off-site acquisition and preservation of the vegetation community. Restoration of temporarily impacted areas involves recontouring the land, replacing the topsoil (if it was collected),

planting seed and/or container stock, maintaining (i.e., weeding, replacement planting, supplemental watering, etc.), and monitoring the restored area for a period of 5 years and or until year 5 success criteria are met. SDG&E shall prepare a Habitat Restoration Plan that shall be subject to approval by the CPUC, USFWS, CDFW, City of San Diego (for restoration within City of San Diego MHPA), and MCAS Miramar (for restoration on MCAS Miramar) prior to habitat impacts. Required mitigation ratios are provided by habitat type in Table 4.1-10. In cases where the impacts to sensitive vegetation communities occur in the City of San Diego MHPA, the mitigation shall also occur in the MHPA. The Habitat Restoration Plan shall also identify, if applicable, the potential for reintroduction and/or increasing MSCP-covered species populations within habitat restoration areas if those covered species were affected by the Proposed Project... [Table 4.1-10 Required Habitat Mitigation Ratios]”

The Restoration Plan shall include the following performance criteria:

- *Percent cover and composition shall be similar to the conditions of a nearby reference site, defined as variation of no more than 10 percent absolute cover from the reference site cover and species composition condition.*
- *Maintenance and monitoring for restoration shall be for a minimum of 5 years or until success criteria are met, even if established success criteria are met before the end of 5 years. Compensation planting areas shall be monitored eight times in Year 1, six times per year in Years 2 and 3, and 4 times per year in Years 4 and 5 above.*
- *Compensation planting areas shall be monitored for invasive plants in the first 5 years following replanting. Invasive plant monitoring shall occur eight times in Year 1, six times per year in Years 2 and 3, and 4 times per year in Years 4 and 5. If invasive plants are found during the 5-year monitoring period, they shall be removed as necessary to support meeting the cover and vegetation composition success criteria.*
- *If the restoration fails to meet the established success criteria after the maintenance and monitoring period, maintenance and monitoring shall extend beyond the 5-year period until the criteria are met or unless otherwise approved by the CPUC.*
- *Maintenance and monitoring shall be conducted following a prescribed schedule to assess progress and identify potential problems with the restoration. Remedial action (e.g., additional planting, weeding, erosion control, use of container stock, supplemental watering, etc.) shall be taken by an experienced, licensed Habitat Restoration Contractor during the maintenance and monitoring period if necessary to ensure the success of the restoration.*

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

For areas where habitat restoration cannot meet mitigation requirements, as determined by the Habitat Restoration Specialist in coordination with CPUC, USFWS, CDFW, and MCAS Miramar (for restoration on MCAS Miramar), off-site purchase and dedication of habitat (or as otherwise prescribed by MCAS Miramar for restoration on MCAS Miramar) shall be provided at the mitigation ratios provided in Table 4.1-10.”

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

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

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

- Adequate SDG&E funding for the preparation and implementation of the HMP
- Legal descriptions of all mitigation parcels approved by the CPUC, USFWS, CDFW, and MCAS Miramar (for mitigation parcels to be acquired for MCAS Miramar impacts)
- Baseline biological data for all mitigation parcels
- Designation of a land management entity approved by the CPUC, USFWS, CDFW, and MCAS Miramar (for mitigation parcels to be acquired for MCAS Miramar impacts) to provide in-perpetuity management
- A Property Analysis Record prepared by the designated land management entity that explains the amount of funding required to implement the Habitat Management Plan
- Designation of responsible parties and their roles (e.g., provision of endowment by SDG&E to fund the Habitat Management Plan and implementation of the Habitat Management Plan by the designated land management entity)
- Management specifications including, but not limited to, regular biological surveys to compare with the baseline data; invasive, non-native species control; fence/sign replacement or repair; public education; trash removal; and annual reports to CPUC, USFWS, CDFW, and MCAS Miramar (for mitigation parcels to be acquired for MCAS Miramar impacts)

3.0 PROJECT IMPACTS

Estimated impacts to sensitive natural communities and habitat from the CPUC Approved Project (Approved Project or Alternative 5) in comparison to the FEIR Proposed Project are listed in Table 1: Estimated Impact Comparison. Final impacts will be calculated post-construction and included in a Project Completion Report (PCR) that will be submitted to CDFW and USFWS. The PCR will be used to determine how much site enhancement and credit withdrawal from the SDG&E mitigation bank is required to address impacts from actual Project-related activities.

Table 1: Estimated Impact Comparison

Estimated Impacts to Sensitive Habitats	Proposed Project (in acres, August 2015)	Approved Project (Alternative 5) (in acres, January 2017)*
Temporary	25.46	1.96
Permanent	3.95	0.79
Total	29.41	2.74

* Approved Project calculations include portions of the Project within the City of San Diego Multi-Habitat Planning Area (MHPA) and on MCAS Miramar.

The Approved Project includes approximately 11.45 miles of underground construction through pavement (developed, bare ground and disturbed areas) and represents a substantial reduction to sensitive habitat when compared the former proposed project. The impact analysis from the former proposed project compared to the impacts anticipated under the Approved Project identified a reduction of approximately 26.67 acres.

3.1 PROJECT IMPACTS BY LAND DESIGNATION

A total of 1.96 acres of temporary impacts and 0.79 acre of permanent impacts to sensitive habitat are anticipated based on the Project design as of December 2016. Please note these impact estimates include potential reductions associated with Minor Project Refinements pending approval with the CPUC. These totals also include impacts within the City of San Diego Multiple Habitat Planning Area (MHPA) and MCAS Miramar. Within the MHPA, SDG&E anticipates less than 0.01 acre of temporary impacts and no permanent impacts to sensitive habitat. Within MCAS Miramar, SDG&E anticipates 0.53 acre of temporary impacts and 0.13 acre of permanent impacts to sensitive habitat outside of designated Preserve areas and no impacts within designated Preserve areas. Impacts on MCAS Miramar will be mitigated in accordance with SDG&E's Tier I application to the Committee for Land and Airspace Management Policy (CLAMP) for the portions of the Project that is located on MCAS Miramar.

Table 2: Approved Project Estimated Impacts

Sensitive Habitat Impacts	Temporary Impacts (acres)	Permanent Impacts (acres)	Mitigation (acres) for Temporary Impacts based on FEIR Ratios	Mitigation (acres) for Permanent Impacts based on FEIR Ratios
Preserve¹	0.01	0	0.01 (2:1)	0 (2:1)
Outside Preserve	1.42	0.66	1.42 (1:1)	0.66 (1:1)
Miramar Outside Preserve	0.53	0.13	0.53 (1:1)	0.13 (1:1)
Totals	1.96	0.79	1.96	0.79

4.0 SDG&E SUBREGIONAL NCCP

SDG&E's Subregional NCCP establishes and implements a long-term agreement between SDG&E, USFWS, and CDFW for the preservation and conservation of sensitive species and their habitats, while allowing SDG&E to develop, install, maintain, operate, and repair their facilities.

4.1 SDG&E NCCP AGREEMENTS

The NCCP includes a Federal ESA Section 10(A) permit and a California ESA Section 2081 memorandum of understanding (for incidental take) with an Implementation Agreement with the USFWS and the CDFW, respectively, for the management and conservation of multiple species and their associated habitats. The NCCP covers 110 species, 18 of which are considered narrow endemic species. The NCCP allows for up to 400 acres of impacts in natural areas over the 50-year permit period. SDG&E has transferred funds to CDFW and USFWS, as required by the

¹ The term Preserve Area means the area encompassed by the Multiple Species Conservation Plan's MHPA map, as currently defined or ultimately adopted, the equivalent maps for the Multiple Habitat Conservation Plan and Multiple Habitat Conservation and Open Space programs in San Diego County, the South Orange County NCCP Subregional Plan reserve area, and the Riverside County Conservation Agency Core reserve areas. The entire Project is located within already delineated Preserve areas.

Funding Agreement (SDG&E 1995c), for the procurement of high quality habitat lands within the NCCP area. This funding allowed the USFWS and CDFW to acquire approved off-site mitigation parcels to create a mitigation bank, comprised of mitigation credits, as part of the NCCP and the Implementing Agreement. This 240-acre mitigation bank, from which mitigation credits are deducted, was established at the inception of the NCCP. The NCCP's Funding Agreement confirms that the land acquired for the SDG&E mitigation bank, the means of acquisition, the manner of vesting title, its purchase price, and its management and maintenance are not the concern of or responsibility of SDG&E, and that the land acquired, or the act of SDG&E's funding itself, shall be deemed sufficient to entitle USFWS and CDFW to approve and certify the establishment of a mitigation bank in favor of SDG&E comprised of mitigation credits (SDG&E 1995c).

The Project is located within the Subregional Plan Area where SDG&E's utility operations (development, maintenance, and repair) are covered by the current NCCP. Under the terms of the NCCP Implementing Agreement, take authorization² is quantified in acres of habitat temporarily or permanently modified or impacted from construction and operation activities up to an established maximum impact acreage (CPUC 2016). MM Biology-6 was developed under the premise that take authorization may not be available through the current NCCP. However, take authorization for this Project can be met under the current NCCP (see Section 3 for a comparison of impacts under the Approved Project compared to the FEIR Proposed Project). Compensation obligations for impacts associated with the Project will be mitigated through habitat enhancement measures and through credit withdrawal from the SDG&E approved mitigation bank. Therefore, the alternatives to NCCP implementation described in MM Biology-6 (i.e., preparation of a Habitat Acquisition Plan, and Habitat Management Plan) will not be required for the Project (see Sections 5 and 6). The mitigation requirements for temporary impact areas will be satisfied through the NCCP and approval of a Habitat Restoration Plan.

4.2 SDG&E NCCP MITIGATION

The Project is located within the SDG&E Subregional Plan Area. Pursuant to the NCCP and the mitigation measures, SDG&E has conducted pre-construction studies for all activities occurring in natural areas and is preparing a Pre-activity Study Report (PSR) outlining all anticipated impacts related to the Project for the CPUC's review and approval. Following Project completion, all impacts from the Project will be documented through a PCR in accordance with the NCCP for purposes of calculating the appropriate mitigation, which will include site enhancement or credit withdrawal from the SDG&E mitigation bank. These impact and mitigation credit calculations will be submitted to USFWS and CDFW as part of the NCCP Annual Report pursuant to requirements of the NCCP and the NCCP Implementing Agreement. At Project completion, SDG&E will also provide documentation to the CPUC showing that mitigation credits for actual permanent impacts were withdrawn from the SDG&E mitigation bank. Documentation may include a copy of the 2019 SDG&E NCCP Annual Report provided to CDFW and USFWS. In the interim, SDG&E will provide annual updates to the CPUC through submittal of cover letters for the SDG&E NCCP Annual Reports demonstrating that

² Under the NCCP, both the federal and state definition of take are used. Federal take is defined as "to harass, harm, pursue, hunt, shoot, wound, kill, capture, collect, or attempt to engage in any such conduct" (16 USC Sections 1532(19), 1538) and state take is defined as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill" (California Fish and Game Code §86).

sufficient SDG&E mitigation credits and NCCP impact cap impact acreages remain available to compensate for estimated Project impacts identified above and in the Project PSRs. Attached to this memorandum is a copy of the 2015 SDG&E NCCP Annual Report showing that as of the end of 2015, SDG&E had 98.304 of the original 280 acres of SDG&E mitigation credits and 186.267 of the original 400 acres NCCP cap remaining. A copy of the 2016 SDG&E NCCP Annual Report will be submitted to CDFW and USFWS by March 31, 2017 and will be provided to the CPUC once available.

4.3 CREDIT WITHDRAWAL FROM SDG&E'S MITIGATION BANK

Mitigation credits from the SDG&E mitigation bank will be deducted to mitigate for unavoidable Project impacts. The mitigation credits serve as mitigation for both in-kind and out-of-kind covered species and habitat impacts, without regard to the type of habitat or the biological value or quality of the habitat impacted. Each mitigation credit represents one acre of high quality habitat. The mitigation credits are expended by SDG&E, in accordance with the mitigation ratios set forth in Section 7.4 of the NCCP and the FEIR to satisfy the mitigation requirements for the Project. The FEIR mitigation ratios would be utilized in the event of a conflict between mitigation ratios identified in the NCCP and FEIR.

Approximately 0.79 acre of permanent impacts to environmentally sensitive habitat will be mitigated through credit withdrawal from the SDG&E mitigation bank. There are sufficient existing credits to satisfy the Project mitigation obligations. The availability of impact credits was also confirmed by the USFWS and CDFW in a June 29, 2015 letter to SDG&E with a copy submitted to the CPUC (USFWS and CDFW 2015). The available mitigation credits and NCCP impact cap acreage remaining as of the end of 2015 was also confirmed in the 2015 SDG&E NCCP Annual Report cover letter attached to this memo. As discussed above, copies of the 2016, 2017, 2018 and 2019 SDG&E NCCP Annual Report cover letters will be provided as they become available to document the continued availability of sufficient credits to mitigate for Project impacts to sensitive habitat.

4.4 RESTORATION OF TEMPORARILY IMPACTED AREAS

A total of approximately 91.47 acres of temporary impacts are proposed for this Project. The majority of temporary impacts are proposed to occur to disturbed, bare ground, and landscape/ornamental communities. Per the NCCP, no mitigation is required for temporary impacts to non-sensitive communities such as bare ground, landscape/ornamental, and disturbed areas. Therefore, no mitigation is required for 89.52 acres of temporary impacts to these vegetation community types.

A total of approximately 1.96 acres of temporary impacts are proposed for coastal sage scrub and chaparral communities. SDG&E is currently developing a Project-specific Habitat Restoration Plan to mitigate for temporary impacts to sensitive habitats. The measures in NCCP Section 7.2 will be incorporated into the Habitat Restoration Plan. However, the Habitat Restoration Plan will address the performance criteria in the MM Biology-6, including maintenance and monitoring for five years or until year five success criteria are met and an extension of the maintenance and monitoring period beyond five years until the criteria are met or as otherwise approved by the CPUC.

4.5 COMPENSATORY MITIGATION FOR PERMANENT IMPACTS

A total of approximately 1.75 acres of permanent impacts are proposed for this Project. Approximately 0.96 acre of permanent impacts to disturbed, bare ground, landscape/ornamental habitats are proposed that do not require mitigation per NCCP. A total of approximately 0.79 acre of permanent impacts to coastal sage scrub and chaparral communities are proposed.

SDG&E proposes to withdraw credit from the SDG&E mitigation bank for actual permanent impacts to sensitive vegetation communities in accordance with ratios identified in MM Biology-6.. Therefore, unless there are changes to the estimated permanent impacts following completion of the Project, SDG&E would withdraw a total of 0.79 acres of mitigation credit from its NCCP mitigation bank to mitigate for impacts to sensitive habitat types as explained in Table 2: Approved Project Estimated Impacts.

5.0 SUMMARY

Under the NCCP, compensatory mitigation for impacts from the Project will be mitigated through habitat restoration and through credit withdrawal from the SDG&E mitigation bank. All areas temporarily disturbed by the Project, which do not need to be maintained in a cleared state and have not been permanently developed, will be restored through revegetation as described in a Project-specific Habitat Restoration Plan currently being developed by SDG&E. Mitigation credits associated from the SDG&E mitigation bank will be deducted to mitigate the unavoidable permanent impacts of the Project following Project completion and calculation of actual impacts.

A total of 1.96 acres of temporary impacts and 0.79 acre of permanent impacts to sensitive habitat are anticipated from the Project. Approximately 0.79 acre of permanent impacts to sensitive habitat will be mitigated through credit withdrawal from the SDG&E mitigation bank. Approximately 1.96 acre of temporary impacts to sensitive habitat will be restored. The USFWS and CDFW confirmed that sufficient NCCP take acreage (29.41 acres) is available to SDG&E to cover the Project's anticipated permanent and temporary impacts to sensitive habitat (USFWS and CDFW 2015) and the 2015 SDG&E NCCP Annual Report shows there is sufficient acreage of the NCCP impact cap remaining.

6.0 REFERENCES

California Public Utilities Commission (CPUC)

2016 Sycamore-Peñasquitos 230-kV Transmission Line Project Final Environmental Impact Report. March 2016.

San Diego Gas and Electric Company (SDG&E)

1995a Subregional Natural Communities Conservation Plan. December 15, 1995.

1995b Subregional Natural Communities Conservation Plan Implementing Agreement/CESA Memorandum. Entered into by and among the United States Fish and Wildlife Service, California Department of Fish and Game, and San Diego Gas & Electric Company. December 18, 1995.

1995c Funding Agreement for Mitigation Credits of the San Diego Gas & Electric Company Subregional Natural Community Conservation Plan. Entered into by and among the United States Fish and Wildlife Service, California Department of Fish and Game, the National Fish & Wildlife Foundation, and San Diego Gas & Electric Company. December 18, 1995.

2016 SDG&E Subregional Natural Communities Conservation Plan, 2016 Annual Report and Comprehensive Review Results from 1995-2015. March 31, 2016.

United States Fish and Wildlife Service and California Department of Fish and Wildlife (USFWS and CDFW)

2015 Take Authorization under the SDG&E Subregional Natural Community Conservation Plan. June 29, 2015.



A  Sempra Energy[®] utility

March 31, 2016

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Subject: San Diego Gas & Electric Company's Subregional Natural Communities Conservation Plan, 2015 Annual Report and Comprehensive Review Results from 1995-2015.

Dear Mr. Stewart and Mr. Pert:

In 2015, San Diego Gas and Electric (SDG&E) conducted a review of all Natural Community Conservation Plan (NCCP) Permit annual reports from 1996 to 2014 in an effort to confirm the amount of take coverage SDG&E has utilized over the life of the NCCP Permit. This review was conducted in conjunction with the United States Fish & Wildlife Service (USFWS) and the California Department of Fish & Wildlife (CDFW), hereafter referred to as the Wildlife Agencies.

To summarize the review, SDG&E has prepared and included the following documents:

1. The Summary of Methodology to Assess Habitat Impacts
2. Updated 1995 – 2015 Annual and Summary reports from SDG&E's database, and
3. The following supporting appendices:
 - a. Original and current impact summary tables;
 - b. Impact Adjustment tables;
 - c. The pending project table; and,
 - d. Maps of the SDG&E access roads reviewed for the 2003 Fire Repair Projects

Together with the 2015 annual report, these documents provide the most accurate and complete summary of the status of SDG&E's NCCP to date.

Additionally, this cover letter discusses the 2015 annual report submittal and provides a summary of the impacts to habitat incurred under the NCCP and the resultant credit withdrawal from the SDG&E mitigation bank for both temporary and permanent impacts to habitat for 2015 (Section I.), projects scheduled for a Post-Construction Report (PCR) that were not completed in 2015 (Section II.), projects from past years with PCRs completed and reported in 2015 (Section III), project sites included in the SDG&E Enhancement and Monitoring Program (Section IV.), 2015 submitted projects requiring correction (Section V.), the total estimated amount of credit

remaining within the SDG&E mitigation bank (Section VI.), and the total estimated amount of impacts to habitat remaining under the SDG&E NCCP (Section VII).

The 2015 SDG&E Annual Report Summary and 2015 SDG&E Annual Report by Site are included with this cover letter as attachments.

The SDG&E Subregional NCCP has been in place for twenty years and the following data has been compiled for 2015:

I. **Credit Withdrawal:** In accordance with the Subregional NCCP, SDG&E activities resulted in the following reportable impacts in 2015:

- a. 5.49 acres¹ (239,283 square feet) of permanent impacts occurred, of which 0.21 acres (9,282 square feet) was to habitat; a total of 0.359 acres (15,629 square feet) of credit was withdrawn from the SDG&E mitigation bank² in 2015.
- b. 102.26 acres (4,454,511 square feet) of temporary impacts occurred, of which 18.03 acres (785,446 square feet) was to habitat; a total of 0.420 acres (18,308 square feet) of credit was withdrawn from the SDG&E mitigation bank in 2015.
- c. A total of 6.959 acres (303,137 square feet) of credit were deducted from the SDG&E mitigation bank in 2015. A large portion of this credit deduction is from the 6.18 acre (269,200 square feet) mitigation that occurred following the 2015 agency review.
- d. A total of 10.519 acres (458,211 square feet) were entered into the SDG&E Enhancement and Monitoring program in 2015.

II. **Projects Scheduled for Post-Construction Reports:** The projects listed below were submitted in 2015 but are in various stages of permitting and have not gone to construction yet. Therefore, these projects are not included in the 2015 annual report. Upon completion of work a Post Construction Report (PCR) will be completed and will be included in a future annual report similar to projects listed in Section III.

Submittal Number	Comments
15-069-30061.01	Pole Repl, P223036, CPEN
15-076-29525.01	CMP, TL23006, Replc Conductor, Z222412-Z222405, CPEN
15-077-29317.02	TL13804, Interset Pole Z100262, San Diego
15-134-30222.01	Gas Line 3011 Validation Digs
15-140-21441.01	Erosion Repair, TT9932, Z226559, Carlsbad
15-157-31425.01	CMP TL23022, Instl Interset Pole Z254470, Lakeside
15-165-30011.01	FiRM 2015 C221 Sec J Reconductor Julian

¹ 1 Acre = 43,560 Square Feet

² Difference in totals are a result of activity type, location, and duration with corresponding ratio determining the mitigation as specified in Table 7.4

III. **Previous Post-Construction Reports Reported for 2015:** Pre-construction Survey Reports (PSRs) submitted in previous years but accounted for in the 2015 annual report are listed in the table below. These projects have completed construction, a PCR has been completed, and SDG&E is accounting for the impacts and mitigation in 2015. Please note that the last project listed (14-115-27110.01) was originally submitted in 2014 but was resubmitted in 2015 due to an internal error. These projects can be found listed first in the NCCP Annual Report:

Submittal Number	Comments
11-003-20789.01	Ramona Transmission Reliability Project
11-031-20615.01	Scenario Town Project, Skills Training Center
12-026-21512.02	Laguna Niguel Reliability
12-033-20519.01	CNF, Circuit 442, Dist Long Span, Los Pinos
12-034-21970.01	Gas Line 1600 - Rainbow to Lake Hodges
12-035-7856.01	TL 637 Wood to Steel Project
12-259-8362.01	TL 6914 Wood to Steel Replacement Project
13-094-23740.01	TL 670
13-115-25870.01	C441: OH REBUILD Private Property
13-117-22015.01	TL 13833 Wood to Steel Pole Replacement, Camp Pendleton
13-131-25986.01	TL636/13819 Fiber Optic Cable, Santee
13-178-20812.01	Plaza Bonita Rd 20A Conversion
14-062-26645.01	Circuit 79 Fire Risk Mitigation Project – Lucky 5 Ranch
14-115-27110.01	Erosion Repair, Span 3008A, Encinitas (Project resubmitted in 2015; 15-162-27110.01)

IV. **Enhancement and Monitoring Program:** In 2015, 31 projects (138 sites) were added to the Enhancement and Monitoring Program per Table 7.4(a) of the SDG&E Subregional NCCP, for a total of 10.519 acres (458,211 square feet). They are listed in a separate attachment (2015 Enhancement and Monitoring Program Table.doc) by their submittal and site numbers, and whether they required active enhancement or monitoring.

V. **Projects Requiring Corrective Action:** A single error occurred with a 2015 PSR submittal, which requires notification in the Annual Report Cover Letter.

Submittal Number	Required Correction
15-41-29649.01	This project, QC, Pole Replc, P512487, Fallbrook, was submitted with the -41 submittal number but did not show up internally on our submittal spread sheet, thus causing 2 separate submittals under -41 to occur. It has been accounted for in the 2015 report so no further corrective action is being proposed.

VI. A total of **98.304 acres of the original 280 acres** of SDG&E's mitigation credits remains.

VII. A total of **186.267 acres of the original 400 acre** NCCP impact cap remains.

Please contact myself or Rob Fletcher at (858) 637-3759 with any questions or requests for clarification.

Sincerely,

Vanessa Shoblock
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cc: Gail Sevrens, CDFW
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