

NOTE:

SDG&E anticipates that the CNF MSUP will require an Operation and Maintenance (O&M) Plan in connection with the facilities authorized under the MSUP. To facilitate the MSUP approval, SDG&E is including this initial draft O&M Plan as part of the Preliminary Plan of Development for discussion purposes during (rather than after) the MSUP review process. No attachments discussed in this initial draft are included. This draft is subject to further revision by SDG&E and USFS. This draft is not effective until it is in final form and the MSUP is approved.

Proposed Working Draft **SDG&E Operating Plan** **for the** **Cleveland National Forest** **Master Special Use Permit**

United States Forest Service
Cleveland National Forest
[INSERT PERMIT NUMBER]
[INSERT PLAN DATE]



**Proposed Working Draft SDG&E Operating Plan for the
Cleveland National Forest Master Special Use Permit**



Signature _____ Date _____
Title,
SDG&E

Signature _____ Date _____
Title,
United States Forest Service

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- Attachment A: Contact List
- Attachment B: Operation and Maintenance Mitigation Measures and Project Approvals
- Attachment C: Detailed Route Maps
- Attachment D: Master Special Use Permit
- Attachment E: Summary of Regulatory Requirements

[INCLUDE ANY NECESSARY ATTACHMENTS FOLLOWING MSUP APPROVAL]

ACRONYMS AND ABBREVIATIONS

AGL	Above ground level
CFR	Code of Federal Regulations
CNF	Cleveland National Forest
CPUC	California Public Utilities Commission
4WD	Four-wheel drive
GIS	Geographic information system
GO	General Order
kV	Kilovolt
mph	Miles per hour
MSUP	Master Special Use Permit
N/A	Not Applicable
O&M	Operation and Maintenance
PAL	Project Activity Level
PRC	Public Resources Code
ROW	Right-of-way
SDG&E	San Diego Gas & Electric Company
U.S.	United States
USFS	United States Forest Service

1 INTRODUCTION

On **[INSERT DATE OF FINAL PERMIT]**, the United States (U.S.) Forest Service (USFS) issued Master Special Use Permit Authorization **[INSERT AUTHORIZATION AND PERMIT NUMBER]** (MSUP) for the fire hardening and continued operation and maintenance of San Diego Gas & Electric Company's (SDG&E's) 69 kilovolt (kV) power lines and 12 kV distribution lines and their associated facilities and access roads located within the Cleveland National Forest (CNF) administrative boundary. This Operating Plan is based in part on the interim operation and maintenance plan developed by the USFS and SDG&E early in the MSUP process in 2006, and in part on SDG&E's operating plan for the Sunrise Powerlink, which was approved by the USFS on **[INSERT APPROVAL DATE]**. This Operating Plan has been prepared to describe the procedures SDG&E will use to operate, maintain, and repair these power lines and distribution lines, as well as their access roads and ancillary and appurtenant facilities, located within the administrative boundary of the CNF. The purpose of this Operating Plan is to implement the continued operation and maintenance of the lines, facilities, and access roads included under the MSUP and to describe the process that will apply to the inspection, operation, maintenance, repair, and replacement (O&M) of these facilities as authorized by the MSUP.

The MSUP authorizes **[INSERT PROJECT DESCRIPTION UPON MSUP APPROVAL]**. O&M activities within the CNF will generally occur within **[INSERT FINAL ACREAGE AND PROJECT LENGTH UPON MSUP APPROVAL]**. **[DESCRIBE AREAS WHERE O&M WILL OCCUR UPON MSUP APPROVAL]**.

The MSUP was approved following environmental review **[DESCRIBE REVIEW PROCESS AND FINAL MITIGATION REQUIREMENTS UPON MSUP APPROVAL]**.

This Operating Plan will ensure that CNF resources are protected as required by the MSUP, and will establish communication procedures for O&M activities. The Operating Plan describes typical O&M activities likely to occur within the CNF and procedures for protecting the environment, public health, and safety, as well as **[DESCRIBE ADDITIONAL PROCEDURES UPON MSUP APPROVAL]**. The Operating Plan also identifies guidelines for SDG&E to conduct O&M activities within the CNF and to ensure compliance with the MSUP and previous environmental reviews.

Specifically, this Operating Plan identifies practices and procedures to address the following areas:

- **[DESCRIBE O&M REQUIREMENTS UPON MSUP APPROVAL]**.

This Operating Plan provides an overview of the procedures SDG&E will follow during O&M activities within the CNF. It is not intended to supersede any of the terms or conditions stipulated in the MSUP. O&M activities will be conducted primarily by SDG&E O&M crews, with some activities to be conducted by SDG&E contractors trained to work within the CNF. A list of key SDG&E compliance staff and departments is included in Attachment A: Contact List **[INCLUDE CONTACTS UPON MSUP APPROVAL]**.

Although SDG&E operates and maintains other electric transmission and distribution facilities (in addition to ancillary facilities, such as access roads) within the boundaries of the CNF, the procedures and requirements of this Operating Plan apply only to those facilities included under the MSUP.

2 BACKGROUND

[INSERT PROJECT BACKGROUND AND ENVIRONMENTAL REVIEW/RESOLUTION UPON MSUP APPROVAL].

The mitigation measures and project approvals that apply to the O&M of the MSUP facilities are described in Attachment B: Operation and Maintenance Mitigation Measures and Project Approvals. The MSUP facilities are depicted in Attachment C: Detailed Route Maps of this Operating Plan.

Figure 1: Overview Map shows the general alignments of the 69 kV power lines and 12 kV distribution lines within the CNF. Detailed maps of the alignment, access roads, and other facilities are included as Attachment C: Detailed Route Maps.

The MSUP authorizes fire hardening activities and O&M activities within the CNF, and is based on the implementation of the following:

- the terms and conditions of the MSUP;
- the requirements described in the Record of Decision;
- **[INSERT OTHER REQUIREMENTS TO BE IMPLEMENTED].**

A copy of the MSUP is included as Attachment D: Master Special Use Permit.

In addition to the MSUP, SDG&E must comply with a number of regulatory and legal requirements to ensure the integrity of the power lines and distribution lines within the CNF and maintain the reliable delivery of power, reduce fire hazards, and protect life and property. Applicable regulatory and legal requirements are subject to revision and may change over time. Attachment E: Summary of Regulatory Requirements describes currently applicable requirements for illustrative purposes.

3 OPERATION AND MAINTENANCE ACTIVITIES

The safe and reliable operation of SDG&E's electric transmission and distribution systems requires the periodic inspection, maintenance, and repair of power lines, distribution lines, and associated facilities within the CNF. SDG&E's major facilities, including 69 kV power line structures, 12 kV distribution line structures, access roads, and footpaths (for structures without ground vehicle access) and the approximate size of their associated work areas are described in Table 1: SDG&E Power Lines, Distribution Lines, and Associated Facilities within the CNF. SDG&E's O&M practices are based on the regulations described in Section 2 Background and are intended to ensure safe, reliable operation of electric facilities while protecting CNF resources. SDG&E will provide notification to the USFS, when possible, prior to initiating

Figure 1: Overview Map

certain activities. Notification procedures are described in more detail in Section 6 Notification Procedures for Operation and Maintenance Activities. The following subsections provide a general description of the routine, periodic, and potential activities that are anticipated to occur under the MSUP. All O&M activities within the CNF will be subject to the environmental protections outlined in Section 4 Environmental Protection and Attachment B: Operation and Maintenance Mitigation Measures and Project Approvals. In addition, SDG&E will continue to conduct these O&M activities in a manner that is consistent with SDG&E’s existing protocols and procedures, including SDG&E’s Subregional Natural Community Conservation Plan and Low-Effect Habitat Conservation Plan.

Table 1: SDG&E Power Lines, Distribution Lines, and Associated Facilities within the CNF¹

Facility Type	Approximate Number of Structures or Sites	Approximate Length/Area	Authorized Work Area
69 kV Power Line	378	10.73 Acres	Approximately 30-foot-wide right-of-way (ROW)
12 kV Distribution Line	508	3.58 Acres	Approximately 20-foot-wide ROW
Power Line Access Roads	--	29.9 Miles	Approximately 12 to 15 feet wide (up to 20 feet at corners)
Distribution Line Access Roads	--	15.5 Miles	Approximately 12 to 15 feet wide (up to 20 feet at corners)
Access Footpaths (for Helicopter-set poles)	333	Varies according to local conditions	Approximately 4 feet wide, depending on local conditions

[INSERT ADDITIONAL FACILITIES FOLLOWING MSUP APPROVAL]

The O&M procedures described in the following sections incorporate currently applicable regulatory requirements derived from the MSUP, as well as regulatory and legal requirements that apply generally to SDG&E power lines and distribution lines.

3.0 ROUTINE INSPECTIONS

SDG&E conducts a variety of inspections and patrols to maintain system reliability and to ensure the safety of the general public and personnel engaged in O&M activities. Per California Public Utilities Commission (CPUC) General Order (GO) 165, inspections for corrosion, equipment misalignment, loose fittings, and other common mechanical problems are performed at regular intervals depending on local conditions and the type of equipment in operation. **[DESCRIBE TYPE AND FREQUENCY OF INSPECTIONS UPON MSUP APPROVAL]** Non-routine inspections are scheduled depending on operational need. The following subsections describe

¹ Ancillary or appurtenant facilities currently exist along the power and distribution lines or access roads. Other ancillary or appurtenant facilities may be added over time consistent with the MSUP and O&M Plan, as needed.

the different types of inspections and patrols. The typical frequency of each inspection is shown in Table 2: Inspections.

Table 2: Inspections²

Activity	Description	Equipment Used	Estimated Frequency
Aerial Inspections – Visual	Aerial survey of power lines	TBD FOLLOWING MSUP APPROVAL	TBD FOLLOWING MSUP APPROVAL
Aerial Inspections – Infrared	Aerial survey of power lines	TBD FOLLOWING MSUP APPROVAL	TBD FOLLOWING MSUP APPROVAL
Ground Inspections	Visual and physical inspection of overhead 69 kV power line structures and associated facilities	TBD FOLLOWING MSUP APPROVAL	TBD FOLLOWING MSUP APPROVAL
Vegetation Inspections	Routine inspections for vegetation along permitted roads, tower sites, and along the ROW	TBD FOLLOWING MSUP APPROVAL	TBD FOLLOWING MSUP APPROVAL
Special Inspections and Patrols	Inspection and/or patrols as needed to respond to system changes, customer complaints, questions, vandalism, and/or system-wide operations	TBD FOLLOWING MSUP APPROVAL	TBD FOLLOWING MSUP APPROVAL

3.0.0 Aerial Inspections

Currently, two types of routine aerial inspections are typically conducted on an annual basis, utilizing a light helicopter for the overhead 69 kV power line facilities. These inspections include the following:

- Visual inspections conducted by helicopter allow for an aerial perspective of overhead structures, conductor spans, and ROW encroachments. These inspections are conducted approximately at the insulator level, or 100 to 200 feet above ground level (AGL). The normal flight speed is 15 to 20 miles per hour. Hovering may also be required at certain locations to further evaluate the infrastructure.
- Infrared helicopter inspections, which are performed with the use of specialized camera equipment, are conducted to identify potential equipment failures. The current camera system mounted on a light helicopter allows these flights to be performed at approximately 300 feet AGL.

² Motor vehicle use is only allowed on existing CNF and permitted roads.

[INCLUDE DISTRIBUTION INSPECTION UPON MSUP APPROVAL]**3.0.1 Ground Inspections**

Routine ground inspections are completed **[INSERT FREQUENCY UPON MSUP APPROVAL]** for 69 kV power lines and underground facilities. These detailed inspections of underground components, overhead structures, and associated facilities are performed to identify possible safety hazards and system defects while ensuring compliance with CPUC GO 95, GO 128, and applicable Public Resources Codes (PRCs). Inspections also include assessments of access routes, vegetation, ROW encroachment, and vandalism.

[INCLUDE DISTRIBUTION INSPECTION UPON MSUP APPROVAL]**3.0.2 Vegetation Inspections**

SDG&E performs routine vegetation management inspections in accordance with PRC Section 4292 requiring brush clearing around poles for fire safety. SDG&E maintains a vegetation clearance of 10 feet in diameter around all poles subject to PRC 4292 for inspection and maintenance purposes. SDG&E also performs routine tree inspections in accordance with Public Resources Code 4293 and CPUC GO 95, Rule 35 for tree clearances around overhead electrical conductors. Vegetation management inspections typically occur on an annual basis to inspect the growth of the vegetation within and adjacent to the ROW. These inspections will typically occur by foot patrol, vehicle, or light helicopter. Helicopters will be utilized in areas that are inaccessible by existing roads.

3.0.3 Special Inspections and Patrols

Special inspections and patrols occur on a non-routine, as-needed basis. Special inspections may occur when preparing for planned outages associated with construction and/or maintenance projects elsewhere in the larger SDG&E electric transmission and distribution systems. Special inspections and patrols may also be conducted before a line is initially energized after construction or re-energized after an extended outage.

3.1 69 KV POWER LINE AND 12 KV DISTRIBUTION LINE MAINTENANCE AND REPAIRS

Routine maintenance and repair work typically includes repair or replacement of structures or conductors, aircraft warning spheres, minor road maintenance, and vegetation work, including removal of vegetation and hazard tree trimming/removal within the pole area as required by PRC 4292. Table 3: Typical Maintenance Activities provides a summary of typical maintenance activities, including access road repair and vegetation management.

Table 3: Typical Maintenance Activities

Activity	Description	Equipment Used	Estimated Frequency
Equipment Repair and Replacement	Replacement, repair, and installation of hardware as needed	4WD vehicle, helicopter, boom truck, line truck	As needed
Insulator Washing	Removal of dirt from insulators by spraying water	Water truck	As needed
Routine Vegetation Management	Controlling vegetation to facilitate the use of access roads, allow inspection and maintenance of facilities, expose potential hazards, prevent potential fire hazards, and provide safe working areas	4WD vehicle, large truck, helicopter, chain saw, chipper, weed whip	Biannually, or as required by line inspections
Tree Trimming	Maintaining adequate line clearances between conductors and vegetation	4WD vehicle, helicopter, large truck, chain saw, chipper	Annual
Access Road Maintenance	Vegetation removal, water bar or culvert cleaning/repair, road grading	4WD vehicle, grader, excavator, dozer, water truck, roller	Every two years or as needed
Pesticide and Herbicide Application	Controlling undesirable woody and herbaceous vegetation (including aquatic plants), insects, rodents, fish, and other pests and weeds	4WD vehicle, helicopter, large truck, applicator	Annual approval by Authorized Officer required
Gate and Barrier Maintenance	Replacement and repair of hardware	4WD vehicle, fork-lift, large truck	As needed

3.1.0 Equipment Repair and Replacement

As detailed previously, the power line and distribution line poles will be inspected on a regular basis to identify items needing maintenance, repair, or replacement and to ensure the continued safe, reliable operation of the lines. In the event that damage to an existing pole occurs, or other unforeseen changes in local conditions that present a potential safety or reliability risk occur, an existing pole may require replacement with a larger or stronger structure at the same general location.

Steel utility poles may support a variety of equipment, such as conductors, insulators, switches, lightning arresters, line junctions, fiber optic cable, aircraft warning spheres, and other electrical equipment. These types of equipment may need to be added, repaired, or replaced in order to maintain uniform, adequate, safe, and reliable service. Therefore, in addition to the replacement steel poles and conductors, SDG&E may install all necessary and proper guys, anchorage, crossarms and braces and other fixtures for use in connection with operation of its electric system, including but not limited to, ancillary facilities such as pole- or pad-mounted transformers and other equipment needed to effectively support and enable electric transmission and distribution across the system.

3.1.1 Insulator Washing

In some areas prone to atmospheric moisture, condensation combined with dust on porcelain insulators can create an electrical discharge. This discharge, known as “arcing,” may cause outages. SDG&E can prevent the outages caused by this condition by washing the insulators routinely. The process of washing insulators involves driving a washer truck to within six feet of the facility and using a high-pressure hose to spray deionized water at the insulators. A two-person crew driving a washer truck is required for this operation. The space needed at each location is approximately 30 feet by 40 feet. Typically, approximately 30 minutes is required to wash and set up each insulator pole set. SDG&E conducts insulator washing on an as-needed basis and where vehicle access is possible.

3.2 VEGETATION MANAGEMENT

The proper maintenance and, where necessary, removal of trees and vegetation near power line and distribution line facilities is essential for the safe and reliable delivery of electricity. Maintenance practices are employed with the goal of eliminating potential tree contact with conductors and controlling the growth of vegetation around power line and distribution line facilities. Eliminating vegetation contact with power lines and distribution lines minimizes the potential for fires and electric service interruptions.

Vegetation management activities for power lines and distribution lines typically occur in two distinct zones. The first zone is generally described as the ROW—where power lines and distribution lines, access roads, and related facilities are located—and includes an area that extends to the maximum conductor sway distance. The first zone will be kept clear of trees that could grow into the lines and have the potential to cause power interruptions and wildfires. SDG&E will maintain vegetation as required by the North American Electric Reliability Corporation, Federal Energy Regulatory Commission, and CPUC.

The second zone is variable in width and extends from the edge of the ROW limit for the first zone. The second zone is designated as the hazard tree zone. The width of the second zone, or hazard tree zone, is determined by terrain, tree height, and other site-specific conditions. Any tree that could fall and hit the power lines or distribution lines is considered a potential hazard. Hazard trees, as currently defined by the PRC and CPUC GO 95, are trees that could grow sufficiently within a year to compromise the CPUC's regulatory mandated clearance between vegetation and the conductors. Hazard trees will be trimmed or cut down to avoid outages and to reduce fire hazards to the surrounding area.

3.2.0 Pole Brushing

SDG&E's annual routine vegetation management work consists of removing brush and trimming trees to meet the standards described in Section 3.2 Vegetation Management. Vegetation management work is identified during annual inspections. In accordance with fire break clearance requirements stipulated in PRC 4292 and California Code of Regulations, Title 14, Section 1254, SDG&E will trim or remove vegetation in the area surrounding power poles to reduce potential fire and other safety hazards. Dead, diseased, or dying limbs and foliage from living, sound trees are removed from approximately eight feet above ground to the horizontal plane of the highest point of conductor attachment. Dead, diseased, or dying trees are also removed. From ground level to approximately eight feet above ground level, SDG&E removes flammable trash, debris, or other materials; grass; herbaceous and brush vegetation; and limbs and foliage of living trees to a distance of 10 horizontal feet from the outer circumference of the pole. For all steel poles, SDG&E clears to bare ground an approximately five-foot-radius around the poles that have exposed, external ground wires, and trims all encroaching trees or other vegetation within approximately 10 feet of the pole. Three-person crews typically conduct this work using mechanical equipment consisting of chain saws, weed trimmers, rakes, shovels, and brush hooks.

3.2.1 Tree Trimming

Tree trimming plays a critical role in maintaining a safe and reliable electrical system. Tree limb contact with electrical lines may cause power outages. Fast-growing or diseased, dying, or dead trees may require removal during O&M of the power lines and distribution lines to prevent circuit interruptions or reduce potential fire hazards. Regular inspection, regardless of habitat type, is necessary to maintain proper tree-to-conductor clearances consistent with PRC Section 4293 and CPUC GO 95. Trimming will follow annual tree inspections and will consist of the trim or removal of trees that may encroach within the minimum distance required from power lines. Post-trim clearances will be achieved taking into consideration the inspection cycle, species growth rate, site conditions, conductor voltage, and position of the tree in proximity to the conductors. Trees will be trimmed in accordance with the American National Standards Institute and industry best practices. Tree removal will occur only upon written authorization from the USFS. SDG&E typically conducts tree-trimming activities with a two- to three-person crew, a one-person aerial lift truck, and a chipper trailer. All tree-trimming activities will adhere to the seasonal restrictions described in Attachment B: Operation and Maintenance Mitigation Measures and Project Approvals. **[UPDATE BASED ON FINAL MSUP APPROVAL]**

3.3 ACCESS ROADS

Within the CNF, SDG&E has for decades regularly maintained a network of approximately 30 miles of existing access roads, spur roads, and turnarounds to support and provide access to its existing 69 kV power lines, as well as approximately 17.6 miles of access roads to support existing 12 kV distribution lines. Access roads provide connectivity between established local and regional roadways and power line ROW areas. Spur roads provide access to pole locations and other equipment where these facilities are located away from access road locations. Turnarounds are extended vehicle areas used to provide maneuverable space for work vehicles. These roads and areas may contain paved, gravel, or unpaved earth surfaces. Where existing access roads are damaged, repairs may be made by blading and smoothing the access road as applicable. Importing and compacting more stable materials on existing facilities in unstable areas may also be required. Generally, access roads and spur roads will be graded level and approximately 12 to 15 feet wide (approximately 20 feet wide at corners) to allow construction equipment and vehicles to access each site safely in accordance with the 2007 SDG&E Design and Procedure Manual for Transmission Line Access Roads. Turnarounds will be sized according to local site conditions and as required by construction equipment and vehicles.

In the event that an access road requires improvement outside the existing footprint of the roadway—such as decreasing a turning angle on a hairpin curve to accommodate construction vehicles' turning radii—SDG&E will undertake the following process to eliminate or minimize any potential impacts from this activity:

1. Explore conversion to helicopter access: Where necessary, SDG&E may switch to helicopter access for construction and maintenance of the facility. Depending on the final design and configuration, helicopter landing areas or pads may need to be cleared or constructed depending on topography and the location of the pole and work areas relative to existing access roads and pads, and the ability to reach these areas safely by work crews on foot (generally within 300 feet).
2. Where continued use of the access road is preferred or where helicopter access is not feasible, SDG&E will identify specific road improvements required and complete an environmental review that analyzes and minimizes potential impacts to the following:
 - Hydrological features, such as wetlands and other jurisdictional features
 - Critical habitat for federally or state-listed sensitive species, or for those species identified as USFS sensitive species
 - Cultural resources
 - Aesthetics

SDG&E will submit the results of this review to the USFS for a two-week period and incorporate comments received, where feasible.

Routine maintenance of the access roads will occur every two years, or as needed. Access road maintenance typically consists of activities such as inspection, spot repair of rills, tree trimming, removal of vegetation, maintenance of drainage structures and associated energy dissipaters, and/or minor earthwork to remove ruts and re-establish the original grade. In addition, minor

blading of the surface may be necessary to control vegetation. Routine road maintenance will be in compliance with the environmental protection measures included in **[INCLUDE DOCUMENTS CONTAINING FINAL MEASURES]**. Authorized access routes within the CNF have been mapped in SDG&E's geographic information system (GIS) and will be used by maintenance crews to ensure that only approved access roads are maintained.

In the unlikely event that the need for a new access road is identified, additional analysis, review, and approvals will be required and will be subject to the restrictions and limitations of the MSUP. Installation of new access roads will be designed, to the extent feasible, to minimize habitat fragmentation and disruption of wildlife movement and breeding areas, cultural sites, and waterways through the utilization of dead-ends and spur roads, rather than linking facilities tangentially. When new access roads must be sited in undisturbed areas, they will be sited in lower-quality habitat, to the extent possible. No new access roads will be constructed without the written consent of the USFS.

3.3.1 Gate and Barrier Maintenance

Hardware will be repaired and replaced on gates and barriers on an as-needed basis. SDG&E will regularly inspect gates and barriers when associated access roads are utilized throughout O&M activities.

3.4 INSTALLATION OF UNSPECIFIED APPURTENANT FACILITIES

Operation of SDG&E's facilities within the CNF and throughout the overall electric system may require installation of appurtenant facilities not otherwise specified in this O&M Plan. SDG&E may install appurtenant facilities—such as weather stations, fire safety and early fire detection equipment, smart-grid system data collection equipment, or other technologies or facilities—on steel poles within existing ROWs, as needed, to collect additional information needed to further increase fire safety and service reliability as new technologies become available.

3.5 PESTICIDE APPLICATION

3.5.0 Insecticides and Rodenticides

Pest control is typically only necessary at substations and storage facilities; therefore, insecticide and rodenticide use is not anticipated for the facilities described in this Operating Plan. However, if insecticide use is determined to be needed to safely maintain the 69 kV power lines and 12 kV distribution lines within the CNF, a pesticide use request providing a 12-month period schedule will be submitted annually to the USFS for approval. Consistent with SDG&E Safety Standard G8367 Pesticide Management, SDG&E may use one or more of the following insecticides:

- Hit Squad Industrial Insecticide
- Blast 'Em (Wasp & Hornet Killer)

3.5.1 Herbicides

The chemical means of controlling noxious weeds involves the application of herbicides, which kill or inhibit plant growth and can be very effective in controlling many weed species. Different

weed species may require alternative herbicides, application rates, and application times. Using herbicides to control weeds requires careful planning and a professional staff that is familiar with the application areas and herbicides to be utilized. Consistent with SDG&E Safety Standard G8367 Pesticide Management, SDG&E may use one or more of the following 13 herbicides during pole brushing or other operation and maintenance activities where vegetation removal is necessary for fire safety reasons:

- Rodeo
- Roundup
- Roundup Pro
- Accord Concentrate
- Gallery 75DF
- Garlon 4 Ultra
- Landmark XP
- Milestone
- Pathfinder
- Payload
- Stalker
- Spra-Kil SK-26
- Dimension Ultra 40

If used, herbicide application will occur under the direction of a professional pesticide applicator with either a Qualified Applicator License or an Agricultural Pest Control Adviser License in the State of California. Before applying any herbicides on National Forest System land, the applicators will have approval from the USFS and be aware of all safety regulations, applicable environmental regulations, and the terms and conditions of the SUP. Application of pesticides generally requires one person in a pick-up truck and takes only minutes to spray around the base of the pole—within a radius of approximately 10 feet for distribution and 20 feet for power line poles—subject to the vegetation clearance requirements described in PRC 4292. The employee either walks from the nearest access road to apply the herbicide or drives a pick-up truck directly to each pole location, as access permits. Prior to any herbicide use, SDG&E will submit an anticipated schedule to the USFS for any proposed herbicide use within the CNF on an annual basis, or more frequently as needed, and will work with the USFS to determine the appropriate herbicide per location.

3.6 EMERGENCY WORK

Emergency work is considered an activity that is required to resolve a situation that represents an immediate threat to human life or property, regardless of ownership, as defined by the Code of Federal Regulations (CFR). As stated in 36 CFR 251.50(b), temporary occupancy of National Forest System lands is allowed even without a special use authorization when necessary for the protection of life and property in emergencies, as long as a special use authorization is applied for and obtained at the earliest opportunity, unless waived pursuant to paragraphs (c) through (e) (3) of the same section.

Emergency work includes, but is not limited to:

- activities to maintain, repair, demolish, or replace facilities damaged or destroyed as a result of a disaster;
- emergency repairs to facilities necessary to maintain service essential to public health, safety, or welfare; and
- specific actions necessary to prevent or mitigate an emergency.

Where necessary, emergency work will start immediately to correct unsafe conditions and return SDG&E facilities to service as quickly and safely as possible. Using GIS and on-staff resource specialists, SDG&E will make a reasonable effort to identify potential resource concerns in the area needing emergency work and will take measures to protect CNF resources during and after the emergency. SDG&E will notify the USFS at the earliest opportunity in the event of an emergency that is an immediate threat to life or property. The USFS Emergency Communication Center is available 24 hours per day, seven days per week, for notification of emergency work at 619-557-5262.

4 ENVIRONMENTAL PROTECTION

The O&M activities described in Section 3 Operation and Maintenance Activities will be conducted in accordance with the terms and conditions of the Record of Decision, MSUP, and **[INSERT ANY ADDITIONAL APPROVALS OR FINAL CONDITIONS]**. Environmental compliance will be achieved through the annual training of employees conducting O&M activities, review of proposed O&M activities by SDG&E's O&M environmental compliance team, and the environmental monitoring of O&M activities in the field. The following subsections further describe SDG&E's approach to protecting resources within the CNF, as well as the implementation of ongoing environmental protection measures.

4.0 GENERAL ENVIRONMENTAL PROTECTION MEASURES

SDG&E will protect natural resources within the CNF by adhering to the MSUP, Proposed Action-specific avoidance and impact minimization measures and mitigation measures applicable to O&M activities, use of best management practices, and compliance with company environmental standards and protocols. Specific mitigation measures and project approvals that will be implemented during O&M activities are listed in Attachment B: Operation and Maintenance Mitigation Measures and Project Approvals **[UPDATED BASED ON FINAL MSUP APPROVAL]**.

4.1 AIR QUALITY

[REFERENCE FINAL AIR QUALITY PROTECTION MEASURES FROM MSUP APPROVAL]

4.2 BIOLOGICAL RESOURCES

[REFERENCE FINAL BIOLOGICAL RESOURCES PROTECTION MEASURES FROM MSUP APPROVAL]

4.3 CULTURAL RESOURCES

[REFERENCE FINAL CULTURAL RESOURCES PROTECTION MEASURES FROM MSUP APPROVAL]

4.4 HAZARDOUS MATERIALS

[REFERENCE FINAL HAZARDOUS MATERIALS PROTECTION MEASURES FROM MSUP APPROVAL]

4.5 HYDROLOGY

[REFERENCE FINAL HYDROLOGICAL RESOURCES PROTECTION MEASURES FROM MSUP APPROVAL]

5 PUBLIC HEALTH AND SAFETY

SDG&E will protect public health and safety through the implementation of applicable plans, permits, and other legal requirements, such as SDG&E's Electric Standard Practice 113.1 – Wildland Fire Prevention & Fire Safety (Electric Standard Practice 113.1), **[INSERT OTHER APPLICABLE REQUIREMENTS AS NEEDED]**. These requirements contain measures to address noise, fire prevention, and transportation concerns that may result from O&M activities. These plans, permits, and other legal requirements may be modified over time. In addition, SDG&E will comply with all applicable laws and regulations regarding the public health and safety of SDG&E employees, contractors, and agents. All O&M activities will be performed in a workmanlike manner to ensure the protection of the environment and the health and safety of the public. SDG&E will immediately notify the USFS in the event that a serious accident occurs during O&M activities within the CNF.

5.0 NOISE

SDG&E will respond to third-party complaints of noise generated by vegetation management activities or perceived changes in corona noise from the 69 kV power lines by investigating the complaints and implementing feasible and appropriate measures, as specified in **[INSERT FINAL MITIGATION MEASURE DOCUMENT]**. As part of this Operating Plan, the power lines will be patrolled, and damaged insulators or other power line materials which could cause excessive noise will be repaired or replaced.

5.1 FIRE PROTECTION

SDG&E will comply with state regulations, requirements, and procedures when conducting O&M activities within the CNF. All O&M activities performed within the CNF are subject to the **[INSERT O&M FIRE PLAN TITLE]**. In addition, all O&M activities will comply with SDG&E Electric Standard Practice 113.1, which may be modified over time. This practice is applied to all low complexity construction projects, as well as O&M activities, to set standards and requirements regarding how activities and fire conditions are evaluated, what restrictions must be put into place depending on anticipated fire conditions, and what tools, equipment, and

other measures must be on site or in place according to these anticipated fire conditions. SDG&E Electric Standard Practice 113.1 includes adherence to Project Activity Levels (PALs), which are forecasted risk levels calculated by the USFS to identify potential risks of fire occurring on National Forest System land. PALs are based on fire conditions, including local weather and vegetation conditions, and the designated level is made available by 4:00 p.m. daily for the following day. SDG&E will identify work restrictions and fire precautions that must be observed according to these PALs.

SDG&E will contact the USFS the day prior to scheduled O&M activities for the predicted PAL indices, and will monitor and follow the appropriate precautions for the PALs. Any fire that is discovered by SDG&E maintenance crews along the ROW or adjacent to the ROW will be reported to the nearest emergency response office using the 911 system and to the USFS Emergency Communication Center at 619-557-5262. The USFS will coordinate with SDG&E during fire suppression activities to ensure the safety of fire suppression personnel working near the electric lines.

5.2 TRANSPORTATION AND TRAFFIC

[INCLUDE OVERVIEW DESCRIPTION OF FINAL TRANSPORTATION-RELATED MEASURES AND PROCEDURES FROM MSUP APPROVAL]

6 NOTIFICATION PROCEDURES FOR OPERATION AND MAINTENANCE ACTIVITIES

O&M activities associated with the MSUP will occur entirely within the administrative boundary of the CNF; these activities have been evaluated during the environmental review process for the MSUP, which included evaluation under the National Environmental Policy Act. In certain instances, however, O&M activities may be required outside of the previously authorized areas. In the event that work outside the existing ROW is required, the USFS will be notified prior to initiating these O&M activities in accordance with the notification procedures described in the following subsections. The format of notifications to the USFS is also discussed in Section 6.1 Notification Format. Contact information for the USFS has been provided in Attachment A: Contact List.

6.0 NOTIFICATION CATEGORIES

Notifications to the USFS for O&M activities under the MSUP are sorted into five categories. The O&M activities defined in Section 3 Operation and Maintenance Activities will be conducted in previously authorized areas defined in the MSUP. Notification for these activities will be conducted pursuant to the procedures outlined in each category. Categories 4 and 5 are reserved for Emergency Work and Catastrophic Events.

6.0.1 Category 1: Inspections

Inspections for the power lines and distribution lines included under the MSUP will occur as outlined in Section 3.0 Routine Inspections and Section 3.0.3 Special Inspections and Patrols. Routine inspections include those described in Table 2: Inspections. Non-routine inspections are

conducted on an as-needed basis and may require the immediate dispatch of an SDG&E representative at any time, seven days a week. Both routine and non-routine inspections are conducted utilizing access roads or light helicopters with no ground disturbance, consistent with the MSUP. **[UPDATE BASED ON MSUP APPROVAL]** Advance notification for inspections is not required as part of this Operating Plan.

6.0.2 Category 2: Routine Maintenance, Repair, and Replacement Activities within Permitted Access Roads and/or Work Areas

Category 2 activities include the routine maintenance, repair, and replacement activities described in Section 3 Operation and Maintenance Activities and will be conducted from permitted access roads and/or work areas, as defined in the MSUP. SDG&E will generally notify the USFS in writing and/or via an email a minimum of three calendar days prior to performing Category 2 activities. On some occasions, however, less-than-24-hour or same-day notification may occur. The notice will identify the work area by circuit and/or structure number, the type of work, and the anticipated work schedule. Should the start date for the work change, SDG&E will update the USFS. The USFS is not expected to respond to notification of Category 2 activities.

6.0.3 Category 3: Routine Maintenance, Repair, and Replacement Activities Outside of Permitted Access Roads and/or Work Sites

Category 3 activities include O&M activities outside of the permitted access roads and/or work sites (e.g., new ground disturbance or off-road travels). These activities will require USFS approval prior to work. For any Category 3 activities, SDG&E will conduct an environmental review of the work in accordance with the MSUP. SDG&E will provide the environmental review results—including any proposed avoidance and minimization measures, as well as monitoring—to the USFS at least two weeks prior to the activity start date. Environmental review results will be presented as requested by the USFS. Activities will not begin until the USFS provides authority to proceed with the work.

6.0.4 Category 4: Emergency Work

Emergency work is work required to resolve situations that represent immediate threats to human life or to property, regardless of ownership. This definition is based on 36 CFR 251.50(b), which reads as follows:

Nothing in this section prohibits the temporary occupancy of National Forest System lands without a special use authorization when necessary for the protection of life and property in emergencies, if a special use authorization is applied for and obtained at the earliest opportunity, unless waived pursuant to paragraphs (c) through (e) (3) of this section.

As described in Section 3.5 Emergency Work, emergency work includes, but is not limited to:

- activities to maintain, repair, demolish, or replace facilities damaged or destroyed as a result of an act of nature or sabotage;
- emergency repairs to facilities necessary to maintain service essential to public health, safety, or welfare; and
- specific actions necessary to prevent or mitigate an emergency.

Emergency work will start immediately to correct emergent, threatening, or unsafe conditions and to return the power lines and distribution lines to service. Using a GIS-based review and other methods, SDG&E will make a reasonable effort to identify potential resource concerns in the area needing emergency work and will take measures to protect National Forest System resources during and after the emergency. SDG&E will notify the USFS at the earliest opportunity in the event of an emergency that is an immediate threat to life or property. The USFS Emergency Communication Center is available 24 hours per day, seven days per week, for notification of emergency work at 619-557-5262.

6.0.5 Category 5: Disasters/Catastrophic Events

SDG&E will notify and coordinate with the USFS at the earliest opportunity in the event of an officially declared disaster or catastrophic event (e.g., major fires, floods, or earthquakes) that threatens life and property over an extended period of time (days or weeks). SDG&E will conduct an environmental review of required actions in accordance with all applicable legal requirements. SDG&E will provide the environmental review results to the USFS and coordinate for concurrence and coordination of any remedial action, as necessary.

6.1 NOTIFICATION FORMAT

Notifications from designated SDG&E contacts may be in email format and should be sent to the primary and backup contacts for the Forest Supervisor's Office and Ranger District where the work is proposed as indicated in Attachment A: Contact List. In addition to email notification, emergency work will be reported to the USFS Emergency Communication Center by phone. Points of contact may be updated or changed at any time. SDG&E and the USFS will provide updated points of contact as they occur.

6.1.0 Notification Format Example

To Whom It May Concern:

SDG&E hereby tenders notification of the following work within the Cleveland National Forest:

SDG&E personnel will be [insert the activity] in the general vicinity of [insert area] on [insert date or date range] via [inset form of transportation].

7 WORKER TRAINING REQUIREMENTS

Prior to any O&M activities, all SDG&E employees, contractors, and subcontractors shall receive annual training regarding the appropriate work practices necessary to effectively implement mitigation measures and comply with applicable environmental laws and regulations. The training will include the following procedures and practices:

- The importance of biological, cultural, and paleontological resources
- Appropriate MSUP-specific biological resources avoidance and impact minimization procedures and mitigation measures
- The recognition of possible buried cultural remains and protection of all cultural resources

- The recognition of possible subsurface paleontological resources and protection of all paleontological resources
- The purpose and necessity of protecting biological, cultural, and paleontological resources
- Methods for protecting sensitive environmental resources
- The importance of invasive plant species control and the measures designed to control the spread and/or introduction of invasive species
- Wildland fire prevention and safety awareness

ATTACHMENT A: CONTACT LIST

**ATTACHMENT B: OPERATION AND MAINTENANCE MITIGATION MEASURES AND
PROJECT APPROVALS**

[INCLUDE FINAL MEASURES AFTER MSUP APPROVAL]

ATTACHMENT C: DETAILED ROUTE MAPS

ATTACHMENT D: MASTER SPECIAL USE PERMIT

ATTACHMENT E: SUMMARY OF REGULATORY REQUIREMENTS