



eTS	3461713	Project Manager	
Project Name	VM Annual Pole Brushing Master Rel 2023		
Project Number	SAP	Primary Env. Lead (Contact)	
Field Env. Representative		Environmental Construction Compliance Lead	

To the extent this Release is provided to Contractor for the performance of the project or services described herein, it is Contractor's own and sole responsibility to understand, interpret and comply with all applicable federal, state or local laws, rules, regulations, including any orders or guidance from any governmental or quasi-governmental authority with jurisdiction over this project ("Laws"). Company disclaims all responsibility or liability with respect to Contractor's understanding or interpretation of Laws based on the information provided in this document, and Contractor shall not rely upon or use this Release to understand, interpret or comply with the Laws.

Environmental Requirements Quick Check (see below for details)		For questions and/or to schedule monitors, contact (5-Day Notice Required):		
Pre-Construction Survey required	YES	Biological monitor	YES	
Pre-Construction Environmental Training required	NO	Cultural monitor	YES	
Notify Env. Lead at least 2 weeks prior to scheduled construction date	YES	Paleo monitor	NO	
Env. Access Protocol exists; advance notification required	YES	Aquatic monitor	NO	
		Stormwater monitor	NO	

PROJECT DESCRIPTION AS RELEASED:

Master Release 2023 - Pole Brushing

SDG&E Vegetation Management will complete annual and bi-annual pole brushing as needed to ensure SDG&E remains in compliance with PRC 4292. PRC 4292 requires a 10-foot clearance of any tree branches or ground vegetation from around the base of power poles with certain overhead hardware (lightening arrestors, fuses, switches, etc.). PRC 4292 requires the removal of dead, dying or diseased trees within the 10-foot cylinder in their entirety. A single-person crew typically conducts pole brushing. The crew accesses poles either by using access roads or by hiking to the pole locations. No off-road vehicle travel is conducted, and no vegetation is trimmed to access the pole. At the site, the crew utilizes a variety of tools to clear the 10-foot radius to bare mineral soil, including weed-whackers, chainsaws, leaf blowers, loppers, rakes, and McLeod rakes.

If herbicide will be effective at a specific brushed area, the brushed area will be treated with herbicide following brushing to prevent additional growth. However, herbicide is not used on poles that fall within Federal lands (e.g., Department of Defense, U.S. Forest Service, Bureau of Land Management) with the exception of the Bureau of Indian Affairs, unless otherwise cleared by the individual Federal Land Holder. All herbicide treatments are conducted in compliance with the applicable rules and regulations set forth by the California Department of Pesticide Regulation (California Code of Regulations Title 3). If a pole moves more than 10 feet on non-CNF land, it must be submitted for review again. If a pole on CNF has moved, it needs to be submitted for review again.

Project General Construction Constraints:

- ✓ This Project has poles located on CNF land and is considered a Class 1 activity and MAY require a notification be submitted to the Cleveland National Forest at a minimum of 5 business days prior to scheduling the work. Send the notification via CNF Notification in Outlook. Contact Dayna Getelman or the Environmental Lead with any questions on the notification process.
- ✓ Fire Tool Requirements (required for ALL Projects on CNF land):
 - One shovel, one axe (or Pulaski), one 5-gallon backpack pump and a fully charged chemical or compressed air foam fire extinguisher Underwriters Laboratories (UL) minimum rating of 2A:10-B:C, on each truck, personnel vehicle, tractor, grader, and other heavy equipment.
 - At least one 4A:80-B:C fire extinguisher or equivalent on each mechanized harvesting machine with hydraulic systems, powered by an internal combustion engine (e.g., chipper, feller/buncher, harvester, forwarder, stroke delimeter).
 - One shovel and one filled 5-gallon or larger backpack-pump type fire extinguisher with hand pump with each welder.
 - One shovel, one Pulaski, and a 5-gallon backpack pump (or minimum 2A10BC fire extinguisher) with each piece of free standing (not vehicle mounted) equipment powered by internal combustion engines (e.g., compressor, generator, welder, etc.)
 - One shovel and one 16-ounce or larger pressurized chemical fire extinguisher when using gasoline powered tools, including but not restricted to, chain saws, soil augers, and rock drills.

- Fire tools shall at no time be farther from the point of operation of the portable gasoline powered tool than 25 feet with unrestricted access for the operator from the point of operation. Fire extinguishers shall be a standard multi-use extinguisher unless otherwise specified. The shovel must be kept on hand when chain saws are used off cleared landing areas.
- Shovels shall be size "O" or larger and no less than 46 inches in overall length.
- Pulaskis shall have 2-1/2 pound or larger heads and be no less than 28 inches in overall length. Concentrations of wood dust and debris shall be removed from all equipment daily or more frequently as required.
- Standard tools must be kept directly accessible to workers at all times when engaged in work activities described in this Fire Prevention Plan.
- ✓ Laydown, storage, or pull sites must be on existing access roads or in approved areas per the Project Description as stated above.
- ✓ If a pole moves more than 10 feet on non-CNF land, it must be submitted for review again. If a pole on CNF has moved, it needs to be submitted for review again.
- ✓ No grading will occur unless approved as part of the Project Description as stated above.
- ✓ Some poles are located on BIA/tribal land. The SDG&E construction supervisor should contact the SDG&E Tribal Relations Manager [REDACTED] and CC [REDACTED] when scheduling all components of work, including ground disturbing work (i.e., digging/pole installation) and overhead work, at least 5 days in advance. Provide the Tribal Lands Access Protocol Request Form (short description of proposed activities, start time, meeting place, and the number of crews) as well as a map of the project location. The tribal representative may determine that tribal escort is required depending on scope of work and location; this tribal escort is separate and/or in addition to SDG&E environmental monitoring requirements. For additional assistance, contact Environmental Lead for support.
- ✓ Vehicles will remain on existing access roads at all times (including areas to turn around) unless otherwise specified in the Project Description listed above. Crews shall obey 15 mph speed limit while driving on all unpaved access roads. If crews cannot access the pole(s) by vehicle from existing roads, they will park vehicles on existing access roads and walk in on foot to access and work on the pole(s).
- ✓ Herbicides are not sprayed near water bodies or on Federal land. Additionally, it is not allowed in certain environmentally sensitive areas. See the Excel list for exact locations.
- ✓ Environmental Lead to make notification to State Parks 10 days prior to working taking place when monitors are required on State Parks.
- ✓ Vehicles must not park or drive through ponded water that may be a vernal pool. No driving on MCAS Miramar when roads are wet. If assistance is needed, contact the Environmental Lead.

This project release applies only to the project as described and scoped. If there is a change in the scope and the project does not match the description, contact the environmental lead because this release is no longer valid.

NATURAL RESOURCES

Env. Specialist: [REDACTED] [REDACTED] [REDACTED]

- Multiple locations cannot have herbicide applied in order to avoid impacts to sensitive resources. Refer to the environmental release table for these specific poles.
- Multiple poles are within known habitat for bighorn sheep and impacts to this species must be avoided. The poles where this applies are indicated by the following Environmental Awareness Statement: If bighorn sheep are seen in the vicinity of the project area, they should be allowed to leave in their own time. Do not approach, startle, or otherwise harass bighorn sheep.
- Biological monitoring may be required at certain locations to avoid impacts to sensitive species, including Laguna Mountain Skipper, Stephen's kangaroo rat, vernal pool species, or peninsular bighorn sheep. Please check the constraints of each pole and contact the Natural Resources lead to schedule the necessary monitor.
- Many locations are within suitable habitat for a sensitive butterfly species, Hermes copper butterfly. The poles where this applies are indicated by the following Environmental Awareness Statement: Pole is within habitat for a listed butterfly species, Hermes copper butterfly. At these locations, crews should take care to use natural openings in vegetation when accessing poles and keep the work area to be brushed to only the previously brushed radius.
- Multiple poles are within the known eagle and other raptor breeding areas. Work at these locations should be avoided during the breeding season (Dec. 1 to July 31) to the extent feasible.
- For poles on Cleveland National Forest, there are additional Resource Protection Measures from the SDG&E CNF MSUP O&M Plan that apply. See details at the end of this release in Table 1.
- Pole brushing activities should occur outside of the migratory bird and raptor breeding seasons for poles on Cleveland National Forest property. To the extent feasible, conduct pole brushing between September 1 and November 30. Contact the Natural Resources Lead to schedule nesting bird surveys if work needs to occur December 1 to August 31.

Standard constraints:

- Crews shall carefully inspect all trees and shrubs that will be affected by SDG&E activities for active bird nests. No active nests or their occupants shall be harmed. If active nests are identified, the crew shall stop work and contact the Natural Resource lead.
- Work crews should follow the operational protocols, as stated in SDG&E NCCP (Section 7.1 Operational Protocols), to avoid, minimize, or mitigate impacts to resources as a result of project-related activities.

CULTURAL RESOURCES

Env. Specialist: [REDACTED] [REDACTED] [REDACTED]

- **A qualified archaeological monitor is required for all ground-disturbing activities at numerous locations; see spreadsheet for poles that require an archaeological monitor (CR Monitor). Please contact the Cultural Resource Lead to arrange for a monitor at least 5 business days prior to work.**
- **On CNF, an archaeological monitor (CR Monitor) and Native American Monitor are required at certain location. Contact Rachel Ruston to arrange for a monitor at least 5 business days prior to work.**
- **Some monitoring locations require advance notification to get permits in place. See spreadsheet for details.**

Standard constraints:

- **CONFIDENTIAL INFORMATION.** Information about archaeological site locations and discoveries is confidential. This information is protected by federal, state, and local laws and violations can result in fines and imprisonment. It is illegal to make or give out maps that show locations of archaeological sites or to tell/share with others where a site is located. Project information provided to protect archaeological sites must remain confidential.
- If archaeological or historical objects or features are discovered, they must be reported to the Cultural Resources Specialist immediately for evaluation. These objects or features may be buried under fill or pavement, or may be on the surface. Examples of discoveries can include (but are not limited to): artifacts such as old cans or bottles, arrowheads/lithic artifacts, pottery sherds, human remains (e.g. bone or possible bone), black/burnt soils.
- Local agency permits may include special stipulations/requirements for cultural and/or paleontological resources. If permits obtained from any jurisdiction, such as a City or County government, includes stipulations/requirements related to cultural or paleontological resources, contact the Cultural Resources Specialist.

Standard Project Constraints

General	<p>If any permit, agreement, lease, easement, etc. is obtained for this project, the person in charge of the project is required to review all documents before construction begins and ensure compliance with the requirements. If any environmental conditions, stipulations, or constraints are noted, the person in charge of the project should contact the Environmental Lead or Environmental Services to review and provide compliance support for the project as needed.</p> <p>This Environmental Release solely pertains to clearance by the Environmental Services Department. It does not address easement or land rights issues. The project submitter must resolve these matters, if any, with the Land Services Department.</p>
Paleo Resources	<p>If fossils are discovered, they must be reported to the Cultural Resources Specialist immediately for evaluation. These objects may be buried several feet below the surface. Examples of discoveries can include (but are not limited to): shell or bone that appear to be stone, plant impressions in stone, and burrows or trace fossils.</p>
Aquatic Resources	<p>None.</p>
Water Quality	<p>Construction crews shall implement applicable sediment and erosion control Best Management Practices (BMPs) as specified in the SDG&E BMP Manual for Water Quality Construction (BMP Manual).</p> <p>If a non-stormwater discharge occurs (a discharge that is anything but rain, e.g., a broken sprinkler head, water leaking from baker tank, fuel leaks, ground water dewatering, etc.), notify the Stormwater Contact.</p> <p>If a small, localized spill occurs, such as vehicle leak, it should be cleaned up with a spill kit and the Stormwater Contact shall be notified.</p>
Land Planning	<p>Each jurisdiction where SDG&E performs work has laws and regulations that must be complied with during construction, including encroachment, traffic control and noise. Work must be implemented in conformance with these laws and regulations as applicable or a waiver, alternative compliance, or consultation must be completed with the jurisdiction prior to the initiation of any staging, site preparation or work.</p>
Air Resources	<p>None.</p>

Hazardous Materials	If hazardous material is released and may be a reportable quantity, contact SDG&E Trouble and Environmental Operations.
Site Assessment	None.
Post Construction Compliance / Sunrise	None

Table 1: Applicable SDGE MSUP O&M Plan for CNF Resource Protection Measures

Source Document	Measure Type	Measure #	Measure Text
CNF MSUP USFWS Biological Opinion	Conservation Measure (CM)	1	Prior to project work, a biologist will identify all Laguna Mountains skipper habitat (to include host plant and nectar sources) within 33 feet of the proposed project(s) right-of-way. During any maintenance activities, a biologist will be present to monitor work and ensure that Laguna Mountains skipper habitat is not affected.
CNF MSUP USFWS Biological Opinion	CM	2	Chipping of vegetation will not be allowed in known or potential Laguna Mountains skipper habitat. This includes access roads and/or the right-of-way within adjacent to (within 33 feet) known or potential Laguna Mountains skipper habitat. Potential habitat will be identified by a biologist either during the host plant/nectar source survey or prior to the onset of right-of-way work.
CNF MSUP USFWS Biological Opinion	CM	3	Vehicles or tracked equipment will only be allowed on existing roads or trails when operating within or adjacent to Laguna Mountains skipper habitat. Prior to operation of vehicles on existing roads or trails, a biologist will ensure that the road or trail itself does not contain host plants or nectar sources.
CNF MSUP USFWS Biological Opinion	CM	10	Speed limits in and around all construction areas will be enforced. Vehicles will not exceed 15 miles per hour on unpaved roads (as stated in section 7.1 Operational Protocols of SDG&E's NCCP/HCP) and the right-of-way accessing the construction site or 10 miles per hour during the night.
CNF MSUP USFWS Biological Opinion	CM	12	No harm, harassment, collection of, or feeding of wildlife by project personnel will be prohibited. No pets will be allowed in the construction areas.
CNF MSUP Avian Protection Plan	3.1	Mitigation Measure BIO-28A	"Construction activities, including to but not limited to tree trimming, road maintenance, (i.e., reestablishing of existing access roads), grading, or site disturbance, may occur during the avian bird breeding season that runs between March 1 st and October 1 st , for non-listed birds, and other seasons as defined below for special-status species, in compliance with the procedures and provisions of this mitigation measure. To avoid avian disturbance by construction activities, an Avian Protection Plan, including a Nesting Bird Management Plan, shall be developed in coordination with the Wildlife Agencies prior to project onset to develop measures based on site specific conditions to protect birds. This Avian Protection Plan shall be implemented by SDG&E and their biological monitors with oversight by the CPUC and the Forest Service. The Plan shall include procedures to allow the wildlife agencies open communication with the biological monitor(s) and access to scientific data collected that will be open communication with the biological monitor(s) and access to scientific data collected that will be electronically stored in a database approved by the CPUC, the Forest Service, and the Wildlife Agencies. Between February and October during project construction, SDG&E shall provide a monthly summary of nesting bird monitoring activities and at the completion of each nesting season shall provide an evaluation of the data collected to date as specified in the Nesting Bird Management Plan"
CNF MSUP Avian Protection Plan	3.3	Mitigation Measure BIO28C	The Avian Protection Plan shall include the following measures: a) Compliance with the Migratory Bird Treaty Act (MBTA) b) Compliance with Fish and Game Code Sections 3503, 3503.5, and 3511 c) Activities shall be prohibited within: a) Approximately 0.25 mile of the California spotted owl active nest sites (or activity centers) during the breeding season (February 1 through

Source Document	Measure Type	Measure #	Measure Text
			<p>August 15) unless surveys confirm that California spotted owls are not nesting within 0.25-mile radius</p> <ul style="list-style-type: none"> b) 500 feet of raptor or owl active nests c) 500 feet of federally and/or state-listed birds active nests d) 250 feet of occupied burrowing owl burrows from February 1 to August 31 or within 160 feet from October 1 through January 31; and e) 150 feet of non-listed birds as specified in the avian protection plan for other bird species of concern <p>If year-round burrowing owls are identified and there would only be temporary indirect impacts, then work may continue through coordination with the CDFW and monitoring. If it appears that the burrowing owls may be directly impacted, then a relocation plan will be developed for the specific burrowing owl(s). This plan would include the methods to relocate, location of the relocation, and post-relocation monitoring. Active relocation and banding of birds is not required. Similar buffers will be utilized for non-Forest Service lands as specified in the Avian Protection Plan and Nesting Bird Management Plan. 'Nest' is defined as a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. 'Active nest' is defined as once birds begin constructing, preparing, or using a nest for egg-laying. A nest is no longer an "active nest" if abandoned by the adult birds or once nestlings or fledglings are no longer dependent on the nest."</p> <ul style="list-style-type: none"> d) Apply APLIC Measures. Specific APLIC measures to be applied must, at a minimum, allow the circuits to meet National Electric Safety Code (NESC) requirements and should provide general information on specialized construction designs to meet APLIC standards. In particular, conductor separation between the energized and grounded hardware should meet the current state of the art requirements to protect species up to California condor. If appropriate separation is not feasible, then the energized parts and hardware should be covered. As appropriate, bird diverters should be deployed as well."
CNF MSUP Avian Protection Plan	3.5	Mitigation Measure BIO-28E	<p>"In order to identify locations of current bald eagle (<i>Haliaeetus leucocephalus</i>), golden eagle (<i>Aquila chrysaetos</i>), California spotted owl (<i>Strix occidentalis</i>), American peregrine falcon (<i>Falco peregrinus anatum</i>), or federally and/or state-listed or fully protected bird nests, the monitoring biologists will coordinate with the USFS, USFWS, and CDFW to ensure that the most up to date information is made available to monitoring biologists. If work will be conducted within a one-mile buffer of historic and currently known nests during the bald or golden eagle breeding season (December 15 through July 31), SDG&E will survey the historic and currently known nests sites to determine if they are active. If nests are determined to be active, then work within 1 mile of active nests shall be rescheduled until after the completion of nesting activity at those nests. Alternatively, SDG&E may plan work activities to occur outside of the 1-mile buffers during the breeding season."</p>
CNF MSUP Avian Protection Plan	6.8.3	Raptors	<p>Active raptor nests will be left in place if they do not pose a threat to reliability of the electric line or if they do not create a potential fire risk. If a specific nest poses a threat to operations, or if it may be a problem in the future, then management action may be necessary. Nest management actions will be accomplished during the non-breeding season to the extent feasible. If it is necessary to remove an existing raptor nest during the breeding season, a qualified biologist will survey the nest prior to removal to determine if it is active. If the nest is determined to be unoccupied, it will promptly be dismantled and removed from the site under the supervision of a qualified biologist. If the nest is determined to be active, authorized Class II or III O&M activities may be delayed until after the nest is no longer active. For Class IV emergency O&M activities, removal of the nest, eggs, and/or chicks may be required. In such cases, SDG&E's Environmental Services department will notify the USFS consistent with the timelines in the O&M Plan, and USFWS and CDFW in accordance with all applicable regulations and permits. This may include contacting a permitted raptor rehabilitator, as provided in Section 6.8 Key Resources.</p>
CNF MSUP Avian Protection Plan	6.8.4	Threatened/Endangered, State Fully Protected, or Eagle Species	<p>Coordination with the USFWS and CDFW is required prior to the removal of any unoccupied or active nest belonging to a threatened or endangered bird species. SDG&E will obtain the appropriate permits or conduct consultation with the wildlife agencies as appropriate, if nest removal for a threatened or endangered species is necessary. Nests of species that are listed under the Bald and Golden Eagle Protection Act have additional protections, and unoccupied eagle nests cannot be removed without a permit.</p>