

**SUNRISE POWERLINK<sup>SM</sup>**

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**SDG&E SUNRISE POWERLINK  
CONSTRUCTION FIRE PREVENTION PLAN**

*Construction, Operation, and Maintenance*

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# 1. CONSTRUCTION FIRE PREVENTION PLAN DEFINITIONS

1. **Activity Risk:** An activity risk includes those activities that present a risk of igniting a wildfire.
2. **“Elevated” Fire Risk Conditions:** Fire conditions will be considered to be elevated when the average live fuel moisture content in the service territory is equal to or less than 75%.
3. **ESP 113.1 SDG&E Wildland Fire Prevention & Fire Safety Plan (SDG&E ESP 113.1):** This is an internal SDG&E standard practice or procedure outlining fire suppression tools and equipment required for its employees and contractors, fire prevention requirements, and fire related training. It serves as an attachment to this Plan.
4. **Fire Coordinator:** An SDG&E employee who serves as liaison or agency representative to the fire agencies and other emergency services during an emergency and with other fire related activities in non-emergency situations.
5. **Fire Marshal:** An SDG&E employee assigned full-time during the construction phase to monitor compliance with this plan, to continually evaluate fire prevention and fire safety issues, and to be the primary contact with the fire agencies.
6. **Fire Patrols:** SDG&E shall implement ongoing fire patrols during the fire season as defined each year by local, state, and federal fire agencies. An individual will be assigned as “Fire Patrol” specifically to monitor work activities when an Activity Risk exists for fire compliance. This person verifies proper tools and equipment are on-site, assesses any fire agency work restrictions, and serves as a lookout for fire starts, including staying behind to make certain no residual fire exists.
7. **Fire Suppression Resource Inventory:** SDG&E will provide the fire agencies with 24 hour contact information and on-site fire suppression equipment, tools, and personnel list, updated on a quarterly basis, and make amendments as changes occur.
8. **Mitigation Measure BIO-APM-10:** This is a non-fire SRPL mitigation measure that identifies the biological requirements for all brush or vegetation removal. Compliance with this measure is required when performing all fire mitigation measures.
9. **“Normal” Fire Risk Conditions:** Since fire season is no longer officially proclaimed SDG&E will identify normal fire risk conditions as the average live fuel moisture content in the service territory (as determined by CAL FIRE & USFS) is greater than 75%.

- 10. Plan:** This Construction Fire Prevention Plan, designated as Mitigation Measure F-1a in the joint CPUC/BLM Final Environmental Impact Report/Environmental Impact Statement issued in October 2008.
- 11. Project Activity Levels (PAL):** The U.S. Forest Service uses the PAL system to identify various levels of fire danger and has associated work restrictions and work hour limits associated with each.
- 12. Red Flag Warning (RFW):** A Red Flag Warning is issued for a stated period of time by the National Weather Service (NWS) using pre-determined criteria to identify particularly critical fire danger in a particular geographic area. All construction and maintenance activities shall cease during RFWs, as discussed in the plan.
- 13. SRPL or Project:** The Sunrise Power Link transmission system.

## **2. PROJECT DESCRIPTION**

See map Attachment 1.

**General location:** The Sunrise Power Link (SRPL) will be constructed and later maintained in southern San Diego County and a portion of Imperial County, beginning at the Imperial Valley Substation and traveling west to the Sycamore Substation on the Miramar MCAS. It will consist of (1) 500 kV EHV (Extra High Voltage) transmission line from Imperial Valley Substation to the Suncrest Substation in Alpine and (2) 230 kV EHV transmission interconnects from the Suncrest Substation to the Sycamore Substation. The total distance is 118 miles with an affected right of way area that averages 300 feet across. The SRPL will be constructed and maintained within the wildland areas of southern San Diego County including areas determined to be moderate, high, and very high Fire Hazard Severity Zones (*see attachment 2*). The SRPL will be located in fire jurisdictional and land management responsibility areas for the following departments or agencies; Bureau of Land Management (BLM), U.S. Forest Service, Cleveland N.F. (CNF), CAL FIRE, Imperial County Fire Protection District, Miramar MCAS, and San Diego City. The fire protection for the BLM lands is provided by CAL FIRE and the San Diego City water district lands near Lake Barrett and El Capitan Reservoir are protected by CAL FIRE and CNF, however 2 miles of the Project lies within the San Diego Fire - Rescue protection jurisdiction. Please see table below and attachment 1.

**Table 1. Fire jurisdiction & land ownership:**

<b>Ownership/Responsibility within Project</b>	<b>Fire responsibility</b>	<b>Apprx. Miles in Project area</b>
Private land (SRA)	CAL FIRE (DPA)	36
Private land (FRA)	U.S.F.S. (DPA)	2
U.S. Forest Service (FRA)	U.S.F.S. (DPA)	19
Bureau of Land Mgmt. (SRA)	CAL FIRE (DPA)	23
San Diego City (LRA)	S.D. Fire-Rescue (DPA)	2
Miramar MCAS (DOD)	Miramar Fire (DPA)	2
Imperial County	Imperial County Fire Department	29

(DPA, Direct Protection Area, SRA, State Responsibility Area; FRA, Federal Responsibility Area; LRA, Local Responsibility Area)

**Scope and intent of proposed Project:** The SRPL transmission lines run east-west from Imperial Valley Substation ending at Sycamore Substation on Miramar Marine Corp Air Station. As a result it will traverse through wildland areas of various hazard classes, including approximately (2) miles within the moderate, (7) miles within the high, and (80) miles within the very high Fire Hazard Severity Zones, (*attachment 2*). The construction phase will involve multiple operations that can present a fire ignition risk. The existence of the transmission lines post construction and the resulting maintenance activities will present some fire ignition risk for the life of the SRPL as well. The intent of this Plan is to identify those potential ignition risks and plan reasonable mitigation measures to eliminate or reduce such risks as much as possible. It is also the intent of this Plan to look at the pre-existing hazards along the

route and plan Project activities in a manner that best minimizes the risk of fire. In the higher hazard areas avoidance of hazards, scheduling, vegetation management work, or other means will be used to minimize fire risk. Lastly, it is the intent of the Plan to identify tools, equipment, and training requirements necessary to rapidly extinguish a small fire, should one start during any of the Project operations.

**Project timeframes:** This Project is scheduled to begin construction in March of 2010 and is expected to be completed in mid 2012. Construction will continue through to its completion if the projected timeframe is not met. Work on the Project will take place during all seasons within the proposed time frames including summer and fall, when wildland fire concerns are generally elevated. Although there certainly will be a heightened concern as soon as the annual grasses cure each year, fire mitigations will be addressed for two distinct conditions; "NORMAL", when live fuel moistures are equal to or above 75% (determined by USFS/CAL FIRE sampling data) and "ELEVATED", when live fuel moistures are less than 75%. During the "ELEVATED" time of the year there will be more restrictive operations combined with additional fire risk mitigation requirements. SDG&E will assign a Fire Marshal for the Project duration. **Imperial County will remain in "NORMAL" condition throughout the entire year unless an exception is declared by the Fire Marshal due to extreme weather or large fuel accumulation in work area.** The Fire Marshal will oversee all fire related activities for SDG&E and their contractors.

#### **Description of work activities that will take place in the SDG&E Wildland Fire**

**Area:** The following work activities will take place in areas considered to be wildland as referenced by the SDG&E Wildland Fire Area (see *attachment 3*).

- Construction Phase
  - Vegetation removal; chain saws, brush cutters, chippers, excavators, tractors
  - Road, tower pad, & staging area development; bulldozers, graders, loaders, other equipment
  - Aviation activities; helicopter heavy lift and cargo transportation, landing zones, fueling activities
  - Other construction related activities with the potential to ignite a wildfire:
    - Generators, augers
    - Grinding, welding, and blasting
    - Staging areas with fuel and/or other hazardous or flammable materials (emphasis on flammable)
  - Suncrest Substation construction specific fire related issues
  - Other, as determined by Fire Marshal, Project Supervisor, or Fire Agency
  
- Energized and Maintenance Phase
  - Energized related fire issues
    - Relays, circuit breakers
    - Insulator washing
    - Inspections
    - Other

- Vegetation management chain saws, brush cutters, chippers, excavators, tractors, other
- Tower Maintenance grinding, welding, aviation, other



### **3. PROJECT FIRE RISKS:**

During the construction phase of the Project, SDG&E shall implement ongoing Fire Patrols during the fire season as identified each year by local, state, and federal fire agencies when performing any activity in the SDG&E Wildland Fire Area (see attachment 3). The following describes activities creating fire risks associated with the Project that will occur within the SDG&E Wildland Fire Area; where they apply, to what extent they apply, and what time frame they are applicable. Others will be added as they become identified by SDG&E or a participating fire agency.

<b><u>Activity Risk:</u></b>	<b><u>Location on Project:</u></b>	<b><u>Miles or Acres on Project:</u></b>	<b><u>Time of year and duration:</u></b>
1. Working on energized or de-energized electrical equipment.	Entire SRPL	118 miles	All year
2. Any off-road vehicle use within Project area.	Entire SRPL	118 miles	All year
3. On highway activities in particularly hazardous areas.	No areas along highways on route w/exception of UG area in Alpine	n/a	n/a
4. Chain saw use of any kind.	Across entire SRPL	118 miles	All year
5. Use of generators, pumps, augers, or other equipment capable of ignition.	Across entire SRPL	118 miles	All year
6. Other tree removal equipment; whole tree grinders, chippers, skidders, etc.	Across entire SRPL	89 miles	All year
7. Grinding or welding.	Across entire SRPL	118 miles	All year
8. Blasting or other explosive work.	Across entire SRPL	118 miles	All year
9. Aviation activities.	Across entire SRPL	118 miles	All year
10. Pad Clearing accessible areas.	Across entire SRPL	118 miles	All year
11. Pad clearing inaccessible areas.	Across entire SRPL	118 miles	All year
12. Suncrest Substation construction.	South Alpine	80 acres	All year
13. Any vegetation removal	Across entire SRPL	118 miles	All year
14. Personnel smoking areas.	Across entire SRPL	118 miles	All year

**4. PROJECT FIRE RISK MITIGATION MEASURES:** The following pre-identified “Activity Risk” tool and equipment requirements are based on the *Forest Standard Practice Rules 2008* and in most cases exceed those requirements. Activity Risks identified after Project initiation shall be added to this section with appropriate mitigation measures mutually determined by the Fire Marshal and the appropriate fire agency with jurisdictional responsibility.

<b>Activity Risk:</b>	<b>Risk Mitigation Description:</b>
1. Working on energized electrical equipment in or adjacent to wildland vegetation.	<p>“NORMAL”, have required tools and equipment on site, either available on vehicles within 50’ or in a fire box (sealed box of tools) on site for remote sites (delivered by air if necessary). This would be 1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump p/vehicle or 1 firebox [1 (5) gal. backpack pump w/H<sub>2</sub>O, 1 Pulaskis, 1 McCleod, 2 round point shovels] p/5 personnel on job site.</p> <p>“ELEVATED”, same as above with the additional requirement of 1 (5) gallon backpack pump p/3 persons on site and a water reserve that totals 2 refills for each (5) gallon backpack pump w/H<sub>2</sub>O.</p>
2. Any off-highway vehicle use within Project area.	<p>“NORMAL”, have required tools and equipment available in vehicle, 1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump w/H<sub>2</sub>O. Visually confirm that no fire has started behind the path of travel. Vehicles must be highway legal and equipped w/spark arresters if required.</p> <p>“ELEVATED”, same as above with the additional requirement of having a “Fire Patrol” (individual w/shovel and/or backpack pump w/H<sub>2</sub>O) to lag behind vehicle and insure no fire has started and to extinguish rapidly if one has. Use lookouts for early detection of fire starts.</p>
3. On highway activities in particularly hazardous areas.	<p>May not be applicable to this Project, however still prudent to carry all required tools and equipment on vehicles. Work with Fire Agency involved to mitigate any delays to fire response equipment during underground construction near roadways.</p>
4. Chain saw use of any kind in or immediately adjacent to wildland vegetation. (Must comply with PRC Code Div. 4, Ch. 6, 4431 & 4442)	<p>“NORMAL” &amp; “ELEVATED”, have required tools and equipment on site, either available on vehicles within 50’ or in a fire box on site for remote sites (delivered by air if necessary). This would be 1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump w/H<sub>2</sub>O p/vehicle or 1 firebox [1 (5) gal. backpack pump, 1 Pulaskis, 1 McCleod, 2 round point shovels] p/5 personnel on job site. Have 1 round point shovel within 25’ of the chainsaw operation or 1 serviceable fire extinguisher in the operator’s immediate possession. Refuel chain saw after cooling and in a minimum 10’ area cleared of all flammable vegetation. Assign spotter or swamper “Fire Patrol” duties during chain saw operations.</p>

<b><u>Activity Risk:</u></b>	<b><u>Risk Mitigation Description:</u></b>
5. Use of generators, pumps, augers, or other equipment capable of ignition and located in or adjacent to wildland vegetation. (Must comply with PRC Code Div. 4, Ch. 6, 4442)	"NORMAL" & "ELEVATED", have required tools and equipment on site, either available on vehicles within 50' or in a fire box on site for remote sites (delivered by air if necessary). This would be 1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump w/H <sub>2</sub> O p/vehicle or 1 firebox [1 (5) gal. backpack pump, 1 Pulaskis, 1 McCleod, 2 round point shovels] p/5 personnel on job site. Place equipment in a minimum 10' area cleared of all flammable vegetation.
6. Other tree removal equipment; whole tree grinders, chippers, skidders, etc. working in or adjacent to wildland vegetation. (Must comply with PRC Code Div. 4, Ch. 6, 4442)	"NORMAL", have required tools and equipment on site, either available on vehicles within 50' or in a fire box on site for remote sites (delivered by air if necessary). This would be 1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump w/H <sub>2</sub> O p/vehicle or 1 firebox [1 (5) gal. backpack pump, 1 Pulaskis, 1 McCleod, 2 round point shovels] p/5 personnel on job site.  "ELEVATED", same as above with the additional requirement of 1 (5) gallon backpack pump w/H <sub>2</sub> O p/3 persons on site and a water reserve that totals 2 refills for each (5) gallon backpack pump.
7. Grinding or welding, in or immediately adjacent to wildland vegetation (see Forest Std. Practice Act 918.7, 938.7, 958.7 Blasting and Welding)	"NORMAL", have required tools and equipment on site, either available on vehicles within 50' or in a fire box on site for remote sites (delivered by air if necessary). This would be 1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump p/vehicle or 1 firebox [1 (5) gal. backpack pump, 1 Pulaskis, 1 McCleod, 2 round point shovels] p/5 personnel on job site.  "ELEVATED", same as above with the additional requirement of assigning a "Fire Patrol" or observer during grinding or welding operation.
8. Blasting or other explosive work in or adjacent to wildland vegetation. (see Forest Std. Practice Act 918.7, 938.7, 958.7 Blasting and Welding)	Any blasting or explosive work will require a separate and independent fire mitigation plan. The contents of this Plan can serve as the foundation, but each proposed blasting event will require specific direction and mitigation requirements. Fire Agency having authority shall be notified prior to any blasting.
9. Aviation activities	All aviation activities and mitigation requirements will be addressed separately in the "Helicopter Operations Safety Plan" later in this document.
10. Pad clearing accessible areas in or adjacent to wildland vegetation.	"NORMAL", have required tools and equipment on site, either available on vehicles within 50' or in a fire box on site. This would be 1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump p/vehicle or 1 firebox [3 (5) gal. backpack pump, 1 Pulaskis, 1 McCleod, 2 round point shovels] p/5 personnel on job site.  "ELEVATED", same as above with the additional requirement of a standby water truck w/pump and hose (minimum 50 gals.) staged, available, and within 1 mile of work site, 250 gallons within 3 miles and 500 gallons within 5 miles. (can serve more than 1 work site)

<b><u>Activity Risk:</u></b>	<b><u>Risk Mitigation Description:</u></b>
11. Pad clearing inaccessible areas in or adjacent to wildland vegetation.	<p>“NORMAL”, have one fire box on site p/5 personnel containing [1 (5) gal. backpack pump, 1 Pulaski, 1 McCleod, 2 round point shovels].</p> <p>“ELEVATED”, same as above with the additional requirement of 1 (5) gallon backpack pump p/3 persons on site and a water reserve that totals 2 refills for each (5) gallon backpack pump.</p>
12. Suncrest Substation construction	<p>A site inspection prior to Project initiation will determine any additional fire mitigation requirements for the Suncrest Substation and documentation of those will serve as an amendment to this document. The following minimum requirements however will apply.</p> <p>“NORMAL”, have required tools and equipment on site, either available on vehicles within 50’ or in a fire box on site. This would be 1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump p/vehicle or 1 firebox [1 (5) gal. backpack pump, 1 Pulaskis, 1 McCleod, 2 round point shovels] p/5 personnel on job site.</p> <p>“ELEVATED”, same as above with the additional requirement of a standby water truck w/pump and hose (minimum 50 gals.) staged, available, and within 5 miles of work site. (can serve more than 1 work site)</p>
13. Personnel smoking areas	Where permitted, smoking will be in designated areas only, 10’ cleared circle, with ash cans, and no butts left on ground.

## **5. STAGING AREAS, FLY YARDS, AND MAJOR OPERATION WORK SITES:**

List all staging areas and major operations work sites within Project that are located throughout the Project area; San Diego County entries are located in the SDG&E Wildland Fire Area:

<u>ID #</u>	<u>County</u>	<u>Agency With Jurisdiction</u>	<u>Township/Range/Section</u>	<u>Acreage</u>	<u>Comments</u>
19	Imperial	BLM	16S, 12E, Sec. 3	26.37	
1	Imperial	BLM	16S, 11E, Sec. 23 & 24	30.69	
2	Imperial	BLM	16S, 10E, Sec. 12; 16S, 11E, Sec. 7		
3	Imperial	BLM	16S, 9E, Sec. 14	32.02	
4	Imperial	BLM	16S, 9E, Sec. 27 & 28	18.35	
28	Imperial	Private	16S, 9E, Sec. 36	3.64	Storage only
5	Imperial	Private	17S, 9E, Sec. 19 & 20	15.96	
6	San Diego	Fed., private	17S, 8E, Sec. 36; 18S, 8E, Sec. 1	16.35	
7	San Diego	Private	18S, 8E, Sec. 5 & 6	31.02	
40	San Diego	Private	18S, 8E, Sec. 5 & 6		
8	San Diego	Private	17S, 7E, Sec. 7	40.10	
39	San Diego	State, private	17S, 7E, Sec. 9 & 16	96.31	Staging, office, storage site
9	San Diego	BLM	16S, 6E, Sec. 13	31.13	
36	San Diego	USFS	16S, 6E, Sec. 30	23.50	
38	San Diego	Indian Res.	17S, 6E, Sec. 21 & 28	19.89	
27	San Diego	SDGE, private	16S, 5E, Sec. 20	15.71	Storage only
41	San Diego	Private	16S, 5E, Sec. 32	33.66	
34	San Diego	USFS	17S, 5E, Sec. 16	28.45	
12	San Diego	Private	17S, 5E, Sec. 31 & 32	37.22	
13	San Diego	Private	17S, 3E, Sec. 36; 17S, 4E, Sec. 31	93.50	
15	San Diego	BLM	17S, 3E, Sec. 28 & 29	15.09	
22	San Diego	USFS, SD City	17S, 3E, Sec. 7 & 8	11.20	
23	San Diego	SD City	17S, 3E, Sec. 5	17.34	
16	San Diego	Private	16S, 3E, Sec. 18	4.95	
20	San Diego	Private	16S, 3E, Sec. 3	22.07	
26	San Diego	USFS	15S, 3E, Sec. 36	7.96	Storage only
14	San Diego	USFS, private	15S, 2E, Sec. 7 & 18	20.87	
18	San Diego	Private	El Cajon Land Grant	19.87	
17	San Diego	Private	El Cajon Land Grant	10.46	
29	San Diego	SDGE	14S, 1W, Sec. 23	9.35	Storage only
25	San Diego	Private	14S, 1W, Sec. 20	11.69	
24	San Diego	Private	14S, 1W, Sec. 19	9.86	
XX	San Diego	Private	(Thomas Dyke)	13.67	Staging yard
XX	San Diego	Private	(Hanson Aggregate)		Staging yard, fly yard

The following precautions will take place at each fly yard, staging area, or major operations work area;

- The site will be assessed by the Fire Marshal for wildland fire threat and/or risk prior to beginning operations associated with that site.
- Each site will have a minimum of one fire box with tools for 5 personnel and additional tools and equipment as determined by the Fire Marshal and/or jurisdictional fire agency. Requirements will be posted visibly at location.
- If a risk of fire propagating out from the staging area into the wildland exists, the Fire Marshal will invite the jurisdictional fire agency out for an inspection and additional recommendations or requirements.
- The Fire Marshal and appropriate fire agency representative will determine if any hazard reduction will be completed around site perimeter to reduce chance of fire escaping into the wildland.
- Additional specialized tools and/or equipment will be identified during the inspection and requirements posted visibly at the location.
- Additional fly yards, staging areas, or major operation work areas not covered by this document will be reported to the appropriate fire agency prior to initializing activity in those areas. The fire agencies will be given the opportunity to assess these new sites.
- Must comply with Mitigation Measure F-1d (per CPUC/BLM EIR/EIS): Remove hazards from the work area. "The Applicant shall clear dead and decaying vegetation from the work area prior to starting construction and/or maintenance work. The work area includes only those areas where personnel are active or where equipment is in use or stored, and may include portions of the transmission right-of-way (ROW), construction laydown areas, pull sites, access roads, parking pads, and any other sites adjacent to the ROW where personnel are active or where equipment is in use or stored. Cleared dead and decaying vegetation shall either be removed or chipped and spread onsite in piles no higher than six (6) inches."
- SDG&E will provide the fire agencies with a Fire Suppression Resource Inventory which will include 24 hour contact information and a list of on-site fire suppression equipment and make amendments as changes occur throughout the Project.

**6. SUNCREST SUBSTATION:** *(see attachment 4)*

- The site will be assessed by the Sunrise Fire Marshal and the responsible fire agency for wildland fire threat and/or risk prior to beginning operations associated with that site.
- A determination will be made as to additional tools and equipment requirements in addition to those discussed in the "Activity Risks" section of this document.
- A determination will be made as to any hazard reduction measures required around site perimeter to reduce risk of fire escaping into wildland.

**7. OTHER PROJECT TOOLS & EQUIPMENT REQUIREMENTS:** *(describe any special tool & equipment requirements above those required of the California State Forest Standard Practice Act)*

The following equipment will be made available and staged as proximate as possible to on-going Project activities during “ELEVATED” fire conditions to supplement basic requirements already addressed in this Plan. These items should be strategically placed to afford the best opportunity to help to expeditiously extinguish any fire resulting from Project activities.

- Water storage or water reserve, use water buffaloes, (5) gallon cubi-tainers, or fixed tanks to maintain 1,000 gallons of water in the staging areas, fly yards, or major operations work sites for any work activities proximate to that site.
- Pole protection truck, meets the specifications for a Type 6 Fire Truck, or equivalent should be available for staging by the Fire Marshal when conditions and work warrant.
- A cache of hose, pumps, fittings, etc. will be available at staging sites. Amount to be determined by consultation between SRPL Fire Marshal and responsible fire agency.
- The construction Helicopter should be available for fire suppression as determined by the Fire Marshal when conditions and work warrant.
- Each crew member will carry at all times a laminated, Fire Prevention Plan card listing 24-hour contact information, telephone numbers for reporting fires and immediate steps to take if a fire starts. Information on the Fire Prevention Plan card will be updated as needed, redistributed and outdated cards destroyed. On the day the information change goes into effect, the site Fire Marshal will assure this redistribution is conducted before the initiation of any construction activities.

## **8. PROJECT SPECIFIC SCHEDULE RESTRICTIONS:**

All work will cease should any of the following take place:

- The initiation of a Red Flag Warning for the area involved for the entire duration of the RFW.
- U.S. Forest Service PAL declaration that identifies a work activity for a given time period be stopped.
- A special proclamation from an appropriate fire official declaring certain work activities cease for a given period of time due to extreme weather or fire resource availability is at a draw down.

Consideration should be given anytime fire danger is elevated to completing work in early morning hours and not conducting any activities with fire risks during the hot, dry, and breezy part of the afternoon.

**Fire Patrols and Fire Suppression Resource Inventory:** During the construction phase of the Project, SDG&E will implement ongoing Fire Patrols during those times the State and Federal fire agencies elevate their resource staffing patterns due to the seasonal fire conditions. These dates vary from year to year, generally occurring from late spring through mid-November. Fire Patrols will be conducted by the Fire Marshal, or a qualified employee as assigned. See description under Fire Plan Definitions. At all construction areas requiring a Fire Patrol, a standardized form will be used to document Fire Patrols, including any preventative actions. Fire Patrols will also verify the Fire Suppression Resource Inventory is maintained; that all crew members have the Fire Prevention Plan card with 24-hour contact information, including numbers for reporting fires and directions for immediate steps to take if a fire starts. See the section in this Plan for Project Fire Risk Mitigation Measures and for Staging Areas, both of which identify an Inventory of Fire Suppression Resources.

## **9. AGENCY SPECIFIC REQUIREMENTS:**

**9.1 CAL FIRE:** The Project activities must comply with Title 14 of the California Code of Regulations; California Forest Practice Rules 2008, in its entirety for the duration of the Project with particular attention to Subchapter 4, 5, & 6 Article 8 Fire Protection and Public Resource Codes (PRC) 4427 Operation of Fire Causing Equipment, PRC 4431 Gasoline Powered Saws and Equipment, and PRC 4442 Spark Arresters. Also requirements for Smoking and Matches in 918.4, 938.4 & 958.4 (*Copies of pertinent references are found in attachment 5*)

**9.2 U.S. FOREST SERVICE:** The basic tool and equipment requirements of this Plan will be the same for work on the National Forest and must comply with state regulations discussed above. Additional requirements when working on national forest lands protected by the CNF include following the requirements outlined in the "Fire Plan for Activities Under Special Use Authorization" (*ref. 15.2*). Daily monitoring of Project Activity Levels and performing only those allowable work tasks during the acceptable time periods.



**9.3 BUREAU OF LAND MANAGEMENT:** The same requirements as described for CAL FIRE in 9.1 above and for the U.S. Forest Service in 9.2 above.

#### **9.4 LOCAL JURISDICTIONS**

9.4.1 Imperial County Fire Protection District: No additional requirements noted

9.4.2 San Diego City Fire & Rescue: the same requirements as described for CAL FIRE in 9.1

9.4.3 Alpine Fire Protection District: AFPD should be notified when any underground construction work impacts Fire Department access for emergency response

9.4.4 Lakeside Fire Department: No additional requirements noted

9.4.5 Miramar Fire: No additional requirements noted

### **10. RED FLAG WARNINGS, PROJECT ACTIVITY LEVELS, AND OTHER CRITICAL FIRE DECLARATIONS:**

All Project activities that would take place in or adjacent to wildland vegetation for the entire duration of any “Red Flag Warning” (RFW) will cease. Project managers and supervisors will be responsible for exchanging their contact information with Grid Operations, to insure they are notified of these events. At the end of the RFW, confirmation should be obtained from the on-call Fire Coordinator that work can begin again and under what continued restrictions.

For work occurring on U.S. Forest Service (CNF) land, the Project Activity Level (PAL) must be monitored and followed (see Forest Service specific requirements above). Project managers and supervisors will be responsible for contacting CNF daily [(619) 557-5262, at or around 1600 hrs.] for the predicted PAL indices for the following day. Those activities and restrictions applicable to the predicted level will be stopped at the appropriate time on the following day on any national forest lands.

Other critical fire declarations can be made by any jurisdictional Fire Chief for a given period of time, due to unusual circumstances or conditions. As soon as these declarations are shared with the SDG&E Fire Coordinator, Distribution Operations, Grid Operations, or Service Dispatch; they will be communicated to Project personnel by Grid Operations in the same manner as RFWs. Upon notification, all work activities that apply to the specific declaration will cease in those areas identified.

SDG&E Fire Coordinators (company-wide fire managers) have the authority to stop any Project work activity that appears to pose a particular fire risk or hazard not uniquely covered by this Plan. The FC will contact the Fire Marshal, on-site

supervisor or Project Manager directly and identify clearly what will not be allowed, the projected duration, and the circumstances making this action necessary.

## **11. HELICOPTER OPERATIONS SAFETY PLAN:**

When the Project requires the use of helicopters and involves landing or taking off in areas within or adjacent to wildland fuels and vegetation within the SDG&E Wildland Fire Area, special mitigations may be required. A plan specific to the safety related to the helicopter operations will be completed and serve as an attachment to this document. It will include at a minimum the following:

- Identification of all landing areas within the SDG&E Wildland Fire Area
- Wildland hazard assessment for each site
- Fueling safety plan; this plan will follow *Interagency Helicopter Operations Guide – March 2006, Chapter 13 Fueling Operations, ref. 15.3.*
- Identification of special tool and/or equipment requirements for each landing site where applicable.
- Designate a “Helicopter Safety Officer” or manager responsible for compliance with the plan during all helicopter operations.
- A communications plan will be developed to coordinate air operations with the surrounding fire agencies. Air operations will cease upon request by a fire agency

## **12. TRAINING REQUIREMENTS FOR SDG&E & CONTRACT PERSONNEL**

Prior to Project initiation and each spring prior to the curing of the annual grasses; all Project supervisors (*SDG&E & Contractors*) will receive a minimum of 1 hour training on Wildland Fire Prevention and Safety (*ref. SDG&E ESP113.1*). This training will be provided by an SDG&E Fire Coordinator or their qualified designee. This training will then be shared with all construction personnel either by the Project supervisors or an SDG&E Fire Coordinator or designee when available. Each member of the construction crew shall be:

- Trained and equipped to extinguish small fires in order to prevent them from growing into more serious threats.
- Trained in fire prevention
- Trained in Initial Attack Firefighting
- Trained in fire reporting
- At all times within 50' of required fire related tools and equipment

This supervisory training will be conducted by the Fire Marshal or other qualified fire expert and compliance and documentation for all training will be monitored by the Project Fire Marshal.

## **13. SAFETY BRIEFINGS, INSPECTIONS & COMPLIANCE PLAN**

A formal pre-Project inspection and plan review will take place with a minimum of the SDG&E Contract Administrator, the contract Project Manager, the SDG&E Project Manager, the SDG&E Fire Coordinator, the Fire Marshal, the Helicopter Manager, and invitations to the respective fire agencies. Monthly inspections of work sites and/or when a new site is initiated will take place with a minimum of the SDG&E Contract Administrator, Fire Marshal, and the contract Project Manager. The Fire Marshal will conduct routine unannounced inspections a minimum of twice weekly. The Fire Marshal will develop an inspection check sheet to document these inspections.

Prior to Project initiation, all Project personnel will receive a ½ hour presentation on the contents of this Plan along with additional fire safety and fire prevention information provided by an SDG&E Fire Coordinator. Supervisors will be responsible for sharing its content with transient Project personnel throughout the duration of the Project. A review of the content of this Plan will take place at a formal safety briefing; a minimum of once each month the “ELEVATED” condition. Each daily safety tailboard session should include an assessment of the day’s fire related risks or hazards and the mitigation for each. The contractor Project Manager will submit in writing to the Fire Marshal a review of the upcoming month’s work activities, a brief fire risk & hazard assessment, and a mitigation plan for the month using the guidance in this Plan.

Compliance with this Plan is mandatory. Monitoring compliance with this Plan is everybody’s responsibility. All levels of Project Management have the authority to shut down any operation that presents an inappropriate amount of fire risk or hazard until it can be properly mitigated. Violations of any of the requirements of this Plan will be addressed immediately. Appropriate consequences for repeated or serious negligence in respect to this Plan will be dealt with accordingly. The Fire Marshal shall develop an inspection checklist that will include daily checks, weekly, and monthly as appropriate. These inspections will be conducted, documented, retained and compliance audited by the SRPL Construction Safety Manager.

## **14. COMMUNICATIONS PLAN**

The ability to communicate with all Project personnel working with the SDGE Wildland Fire Area is mandatory. Cell phone, Satellite phone, and/or radios are all acceptable means provided they work appropriately within the area of the work. Communications must be maintained even if it requires the use of portable repeaters, human repeaters, or other technological means for this to happen. The Fire Marshal, Contract Administrator, or contract Project Manager must be able to contact the appropriate Emergency Communications Center immediately in the event of an emergency. If one of the three is not available to perform this function, the task must be officially delegated for the duration of the absence. SDG&E will provide the fire agencies with a Fire Suppression Resource Inventory which will include 24 hour contact information and a list of on-site fire suppression equipment and make amendments as changes occur throughout the project. Reporting to fire agencies must be done quarterly per Mitigation Measure F-1a.

All construction crews and inspectors will be required to have radio and cellular telephone access that is operational along the entire length of the approved route to allow for immediate reporting of fires. As part of the Fire Patrol duties, communication pathways and equipment will be tested and confirmed operational each day prior to initiating construction activities at each construction site. All fires will be reported to the fire agencies with jurisdiction in the Project area immediately upon ignition.

**Community Education and Outreach Program:** The SDG&E Construction Notification Plan, the Community Fire Safety Program and the Sempra Utilities Wildland Fire Prevention and Fire Safety Guide all are avenues that will be used to communicate SDG&E fire prevention practices. The Construction Notification Plan will be mailed to all residents, property owners or tenants within 1,000 feet of the right-of-way of this Project and provide advance notice to residents, property owners and tenants within 300 feet of construction activities. Additionally, a public affairs officer and a dedicated public affairs contact number have been appointed to address community education and outreach.

## **15. REFERENCES:**

**15.1** California Forest Standard Practice Rules;

[http://www.fire.ca.gov/resource\\_mgt/downloads/2008FPRrulebookwithDiagramswithoutTechRuleNo1.pdf](http://www.fire.ca.gov/resource_mgt/downloads/2008FPRrulebookwithDiagramswithoutTechRuleNo1.pdf)

**15.2** U.S. Forest Service Fire Plan for Construction and Service Contracts; ref: FSH 6309.32 and 6309.11 04-26-04

**15.3** Interagency Helicopter Operations Guide; <http://www.nifc.gov/ihog/>

**16. PLAN APPROVAL:** The signatory reviewing officials are acknowledging that SDG&E has a Construction Fire Prevention Plan that is appropriate and necessary to mitigate fire hazard and risk for the SRPL construction and maintenance activities. They do not accept any responsibility for SDG&E interpretation or implementation of this Plan during the construction and maintenance of the SRPL or for any resulting actions associated with these activities.

Reviewed by:

\_\_\_\_\_  
Fire Coordinator

\_\_\_\_\_  
Date

\_\_\_\_\_  
CAL FIRE

\_\_\_\_\_  
Date

Approved by:

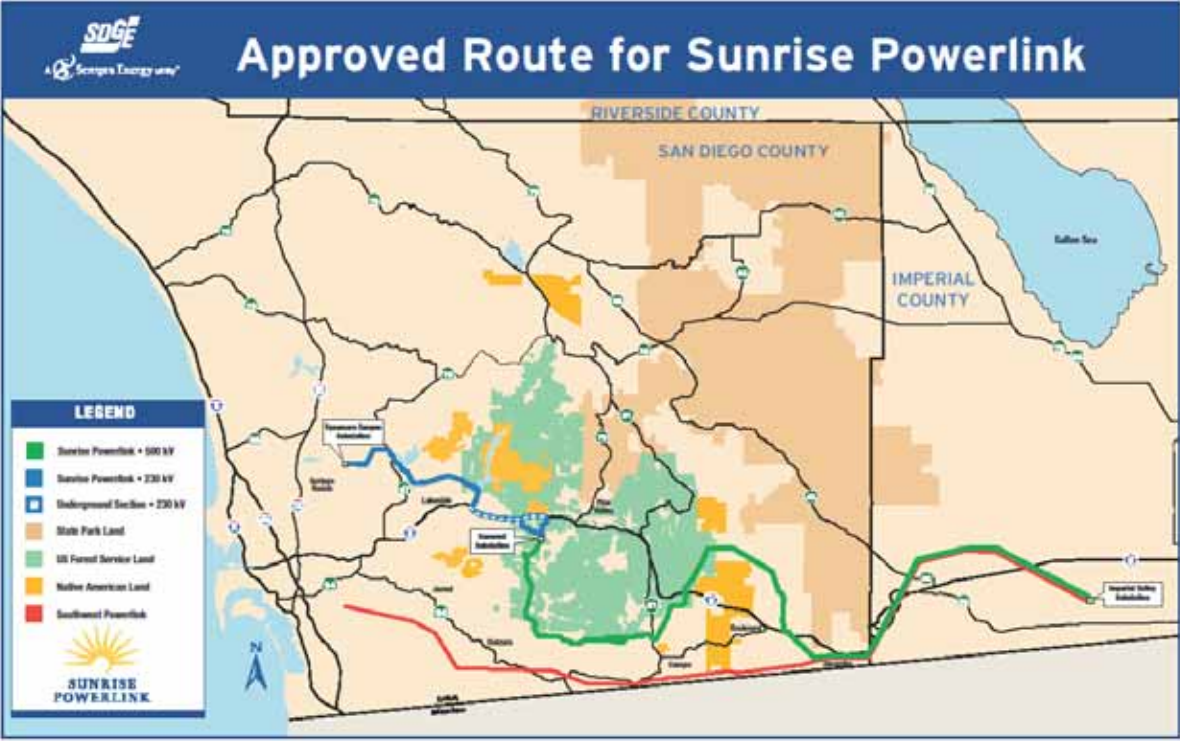
\_\_\_\_\_  
SDG&E Project Manager

\_\_\_\_\_  
Date

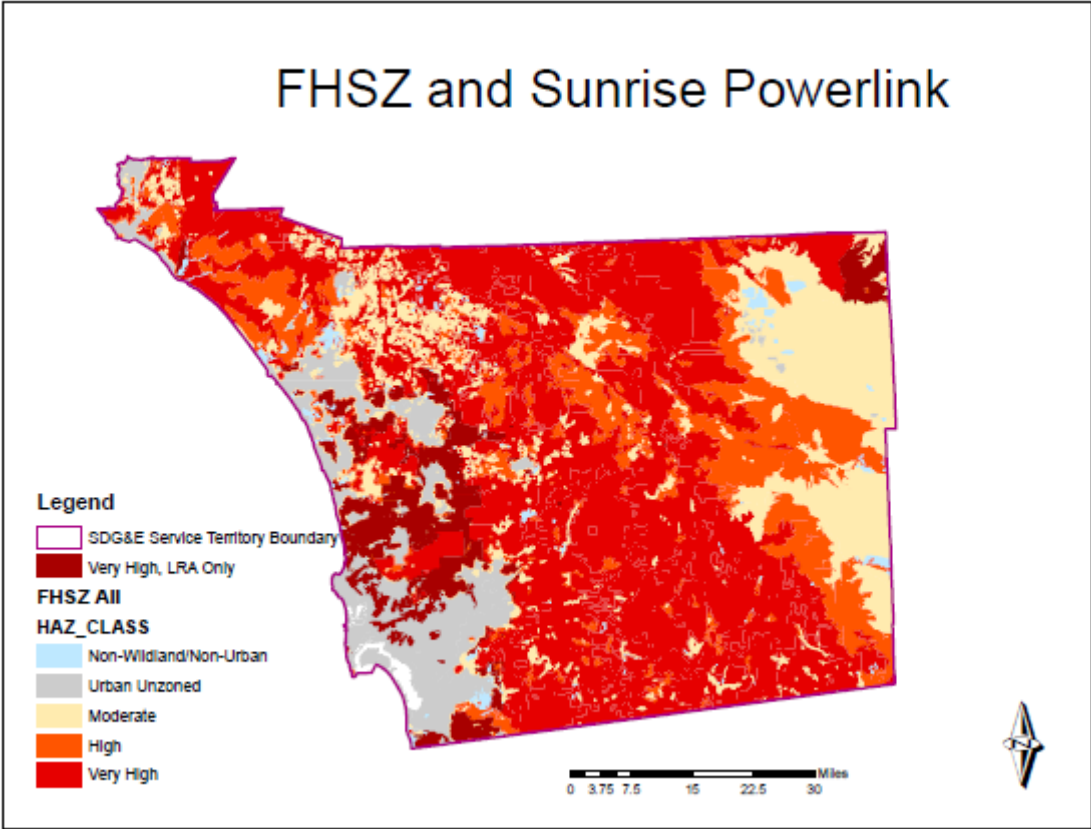
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SDG&E Project Fire Marshal

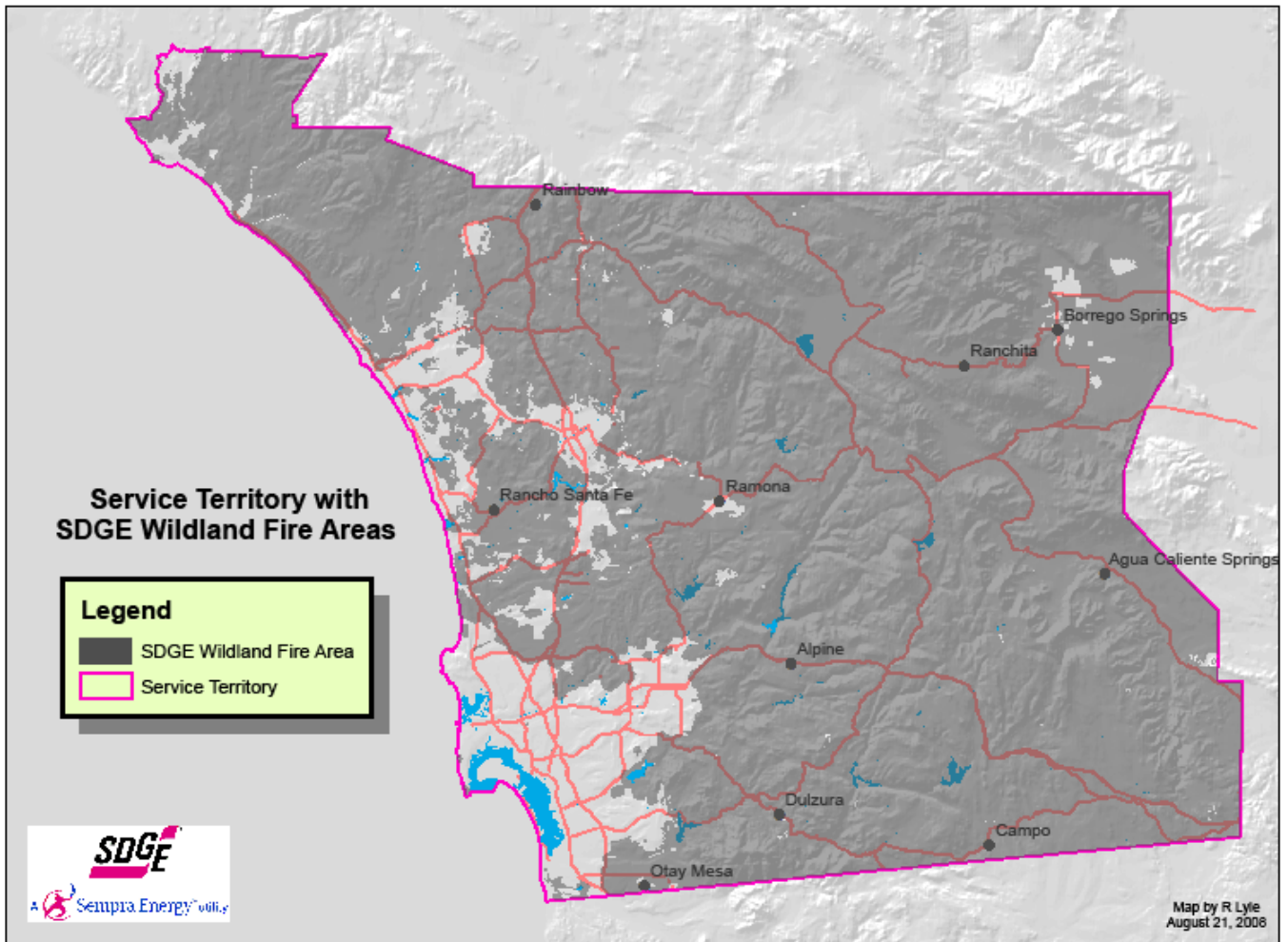
\_\_\_\_\_  
Date

Attachment 1



Attachment 2

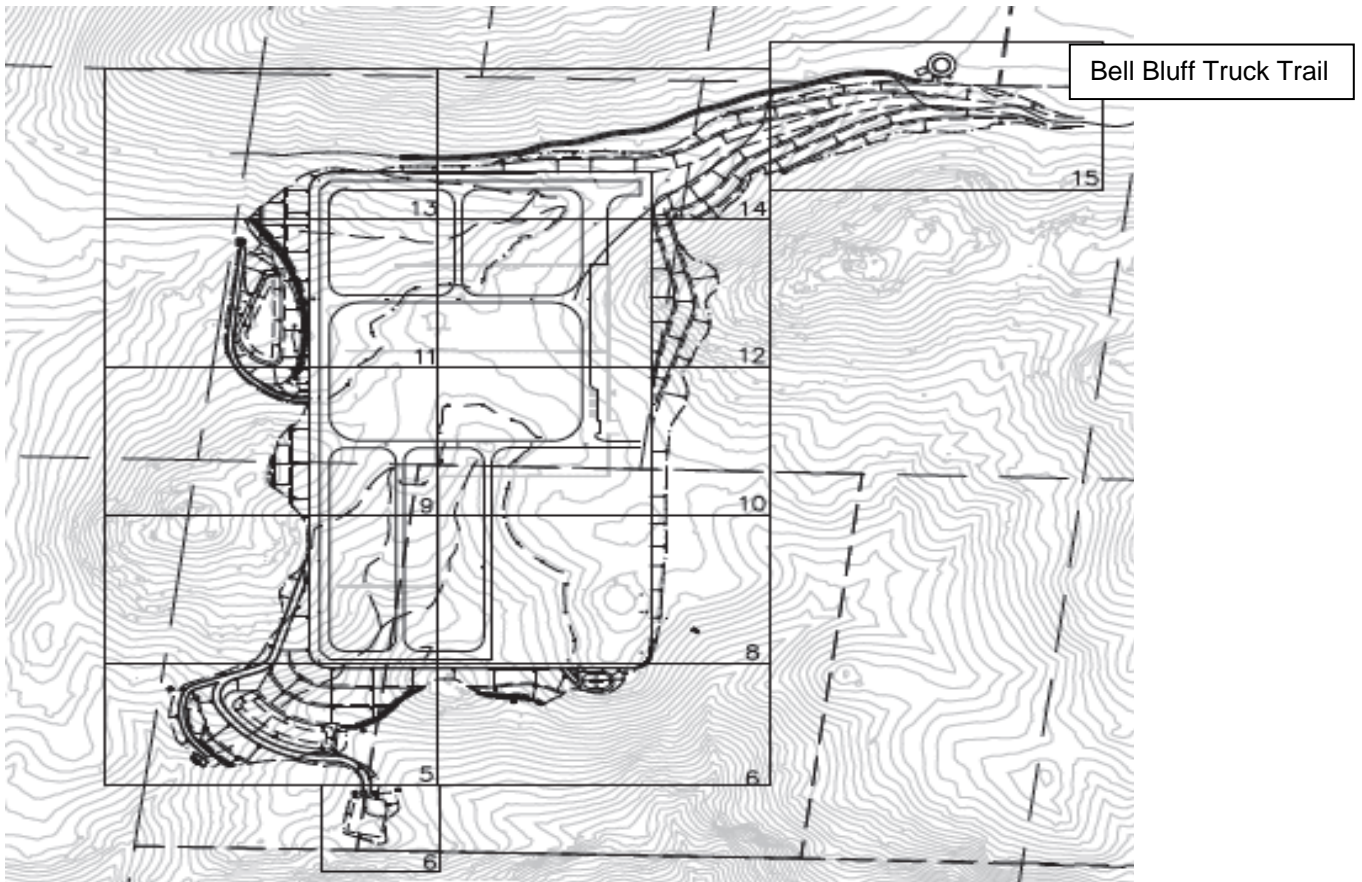






# Attachment 4

## Suncrest Substation



### Suncrest Substation Proximity

