SAN DIEGO GAS & ELECTRIC COMPANY

CLEVELAND NATIONAL FOREST POWER LINE REPLACEMENT PROJECTS

HELICOPTER LIFT PLAN

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1 – INTRODUCTION

This Helicopter Lift Plan (Plan) describes San Diego Gas & Electric Company's (SDG&E's) safe transportation procedures to be implemented during helicopter external load operations on the Cleveland National Forest Power Line Replacement Projects (Project). The Project includes the following components:

- Replacement of approximately 1,400 existing wood poles with fire-resistant, weathered steel poles;
- undergrounding of approximately 26 miles of existing 12 kilovolt (kV) distribution lines;
- removal of approximately 30 miles of existing 12 kV and 19 miles of existing 69 kV overhead facilities; and
- closure of up to 24 miles of access roads.

This Plan was prepared in accordance with Mitigation Measure (MM) PHS-6, as described in the Project's Final Environmental Impact Report/Environmental Impact Statement's Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) and the USFS Record of Decision (ROD).

2 – OBJECTIVES

The purpose of this Plan is to provide the SDG&E construction management team with a description of measures that will be implemented during helicopter external load operations to accomplish the following:

- Identify Federal Aviation Administration (FAA) regulations applicable to external load operations
- Enhance safe transportation of external loads during construction of the Project.

3 – MITIGATION MEASURES

The MM included in the MMCRP and ROD for the Project and pertaining to the implementation of this Plan are listed in the following subsection.

3.0 MITIGATION MEASURE PHS-6

"If, during construction activities, it is anticipated or planned that helicopters will be used for external load operations, including carrying structures, San Diego Gas & Electric (SDG&E) will prepare a Helicopter Lift Plan. This plan will be prepared in accordance with and comply with all relevant FAA regulations, as well as SDG&E's Aviation Operations Manual. Prior to initiation of construction activities for each alignment, if determined that helicopters would be used, the Helicopter Lift Plan will be provided to the California Public Utilities Commission."

4 – PLAN IMPLEMENTATION

4.0 GENERAL SAFETY PRACTICES

Due to the nature of the terrain and the inaccessible pole locations throughout the Project area; helicopters will be utilized as an important tool to accomplish the wood to steel initiative. Helicopter support will be ongoing throughout the entire duration of the Project, as all Project components will have areas of inaccessibility.

Prior to each work day, all personnel involved in the operations for the day must participate in the morning job briefing. All personnel who regularly interact with helicopters during the course of their work, either on the ground or as a passenger, will complete a basic helicopter safety training class. Alternatively, on a case-by-case basis, the Pilot in Charge (PIC) or his designee will provide on-site safety training prior to any helicopter operation(s). Any worker engaging in external load work will be competent in safe rigging practices and rigging inspections. All rigging will be checked prior to use each day. If the rigging is suspect, it will be removed from service.

Personal protective equipment (PPE) consists of clothing and equipment that provide protection to an individual in a hazardous environment. Employees and contractors are expected to question any unsafe condition or activity in and around the helicopter. If safety is compromised at any time during any helicopter operation, the mission will be shut down immediately.

4.1 APPLICABLE FEDERAL AVIATION ADMINISTRATION REGULATIONS

14 Code of Federal Regulations Part 133: Rotorcraft External Load Operations

49 CFR Parts 106, 107 and 171-180: Rotorcraft External Load Operations transporting hazardous materials

4.2 OPERATIONAL CONTROLS

SDG&E requires a two-tier system of operational control. The first tier consists of the contractor's management, including those in leadership positions listed in the contractor's operations specifications. This management structure will be responsible for verifying that the contractor's pilots are appropriately trained and qualified; that they are assigned to an aircraft that is airworthy and capable of completing the assigned mission; and that the risk associated with the flight is identified, assessed, and mitigated. The contractor's management structure has the authority to initiate, divert, or terminate any flight conducted by its own pilots. Information regarding each aircraft flown by a contractor will be provided to the SDG&E Aviation Services Department (ASD). Additionally, contractors will not use another company's pilots without prior notification to the SDG&E ASD.

The second tier consists of the operational control the PIC exercises as the final authority over the operation of the aircraft. The PIC determines whether a flight can be accepted, initiated, and conducted or whether it must be terminated. The PIC is expected to operate in compliance with Title 14 of the Code of Federal Regulations.

4.3 SDG&E INTERNAL ACCIDENT/INCIDENT RESPONSE PLAN

SDG&E's ASD staff (and other SDG&E employees and departments who might respond to an aviation-related event) will be properly trained and equipped to respond as needed.

The process for accident/incident response involves the following three primary phases:

- confirming an incident or accident has occurred;
- dispatching and monitoring rescue, medical, and recovery assets; and
- dissemination of accident/incident information.

SDG&E ASD staff will continue to perform as the central command and control center for oversight of the accident/incident scene, until SDG&E transfers control to another agency or to an on-scene SDG&E representative. The ASD Manager will determine when it is appropriate to transfer control to another responsible entity.

4.4 EXTERNAL LOAD OPERATIONS

External load operations will be conducted throughout this Project in accordance with applicable regulations identified herein. External load operations will include missions such as installing and removing structures, wire stringing, moving materials, transporting equipment, and human external cargo (HEC) work as necessary.

In the event that helicopters are operating in congested areas, congested area plans will be prepared and submitted to the FAA for approval, and all relevant documentation will be sent to the CPUC as required per MMs. During such operations, all rigging practices will be completed in accordance with all applicable standards and will be done by competent personnel. All external loads will be flown using rated and certified rigging and secured in such a manner to minimize the potential for accidental release from the aircraft.

All helicopter long lines and any other associated rigging will be inspected prior to use each day and removed from service if the condition is suspect. All HEC operations will be flown utilizing an approved secondary restraint system and long lines that are used for HEC-only operations. Any person engaging in HEC work will be trained and competent in those operations. HEC operations will include installing marker balls, transporting workers to otherwise inaccessible areas, and other various missions as needed.

All helicopters conducting external load operations will operate within the weight and balance limitations described in the Rotorcraft Flight Manual. Depending on the mission requirements, different categories of helicopter may be utilized for certain missions. These categories can be described as light, medium, and heavy lift aircraft, and are described as follows:

- Light lift: MD500/530 or AS350 Eurocopter. These aircraft can lift weights up to 2,000 pounds and will be utilized for light lift work, wire stringing, and HEC operations.
- **Medium lift**: Bell 205 Huey or Kmax. These aircraft will typically be used to lift weights between 2,000 and 6,000 pounds, and may be utilized for HEC operations.

• **Heavy lift**: S64 Skycrane. This aircraft will be utilized to lift any loads weighing 6,000 pounds or more.

All flight paths, staging yards, and work areas that will be used for picking up material will be screened by SDG&E's ASD for public safety, accessibility, and feasibility for lift work. All flight paths will be designed to create the least impact possible on the public, businesses, and any other agencies that may be impacted. Prior to operations within 1,000 feet of public schools, coordination will take place between SDG&E (or its contractors) and the relevant school officials, the FAA and U.S. Department of Transportation, as required by law.