

# 7.1 Operational Protocols

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Operational protocols represent an environmentally sensitive approach to traditional utility construction, maintenance and repair Activities recognizing that slight adjustments in construction techniques can yield major benefits for the environment. The appropriate Operational Protocols for each individual project will be determined and documented by the Environmental Surveyor. The information regarding the qualifications and responsibilities of the environmental surveyor is contained in Appendix B. The following mitigation measures shall be adhered to by SDG&E.

## 7.1.1 General Behavior for All Field Personnel

1. Vehicles must be kept on access roads. A 15 mile-per-hour speed limit shall be observed on dirt access roads to allow reptile species to disperse. Vehicles must be turned around in established or designated areas only.
2. No wildlife, including rattlesnakes, may be harmed, except to protect life and limb.
3. Firearms shall be prohibited on the rights-of-way except for those used by security personnel.
4. Feeding of wildlife is not allowed.
5. SDG&E personnel are not allowed to bring pets on the rights-of-way in order to minimize harassment or killing of wildlife and to prevent the introduction of destructive domestic animal diseases to native wildlife populations.
6. Parking or driving underneath oak trees is not allowed in order to protect root structures except in established traffic areas.

7. Plant or wildlife species may not be collected for pets or any other reason.
8. Littering is not allowed. SDG&E shall not deposit or leave any food or waste on the rights-of-way or adjacent property.
9. Wild Fires shall be prevented or minimized by exercising care when driving and by not parking vehicles where catalytic converters can ignite dry vegetation. In times of high fire hazard, it may be necessary for trucks to carry water and shovels, or fire extinguishers in the field. The use of shields, protective mats, or other fire prevention methods shall be used during grinding and welding to prevent or minimize the potential for fire. Care should be exhibited when smoking in natural habitats.
10. Field crews shall refer environmental issues including wildlife relocation, dead or sick wildlife, hazardous waste, or questions about avoiding environmental impacts to the Environmental Surveyor. Biologists or experts in wildlife handling may need to be brought in by Environmental Surveyor for assistance with wildlife relocations.

### 7.1.2 Training

11. All SDG&E personnel working within the project area shall participate in an employee training program conducted by SDG&E, with annual updates. The program will consist of a brief discussion of endangered species biology and the legal protections afforded to Covered Species; a discussion of the biology of the Covered Species protected under this Subregional Plan; the habitat requirements of these Covered Species; their status under the Endangered Species Acts; measures being taken for the protection of Covered Species and their habitats under this Subregional Plan; and a review of the Operational Protocols. A fact sheet conveying this information will also be distributed to all employees working in the project area.
12. Designated SDG&E staff will conduct selected reviews of SDG&E operations. Any proposed modifications to Operational Protocols, procedures or conditions will be promptly provided to CDFG and USFWS for their review and input for required permit or Subregional Plan amendments.

### 7.1.3 Preactivity Studies

13. The Environmental Surveyor shall conduct preactivity studies for all activities occurring off of access roads in natural areas. The scope of these studies is included in Appendix A. The Environmental Surveyor will complete a preactivity study form contained in Appendix A, including recommendations for review by a biologist and construction monitoring as appropriate. Biologists should be called in when there is the potential for unavoidable impacts to Covered Species. The forms are for information only, and will not require CDFG or USFWS approval. These forms shall be faxed to CDFG and USFWS, along with phone notification, who will reply within 5 working days, indicating if they would like to review the project and/or suggest recommendations for post project monitoring. If a biologist is required, he/she will be contacted concurrent to notification to CDFG and USFWS. SDG&E's project may proceed during this time if necessary, in compliance with the recommendations of the biologist (For narrow endemic species see mitigation IV following Table 3.1). USFWS survey protocols performed by qualified biologists will be required for new projects which are defined as projects requiring CEQA review.

In those situations where the Environmental Surveyor cannot make a definitive species

identification, an on-call biologist will be brought in. When the biologist is called, he or she will be contacted concurrently with CDFG and USFWS. The biologist will make the determination of the species in question and recommend avoidance or mitigation approaches to the Environmental Surveyor and a decision will be made. In those situations where more than one visit may be necessary to identify a given species, such as certain birds, no more than three site visits shall be required. It is expected that the typical USFWS search protocols will not be utilized in most situations due to the Plan's avoidance priority. Background information necessary to complete the annual report shall be collected on the preactivity study form and used by SDG&E to prepare the annual report.

14. In order to ensure that habitats are not inadvertently impacted, the Environmental Surveyor shall determine the extent of habitat and flag boundaries of habitats which must be avoided. When necessary, the Environmental Surveyor should also demark appropriate equipment laydown areas, vehicle turn around areas, and pads for placement of large construction equipment such as cranes, bucket trucks, augers, etc. When appropriate, the Environmental Surveyor shall make office and/or field presentations to field staff to review and become familiar with natural resources to be protected on a project specific basis.
15. SDG&E will maintain a library of rare plant locations known to SDG&E occurring within easements and fee owned properties. "Known" means a verified population, either extant or documented using record data. Information on known sites may come from a variety of record data sources including local agency Habitat Conservation Plans, pre-activity surveys, or biological surveys conducted for environmental compliance on a project site (e.g. initial study), but there is no requirement for development of original biological data. Plant inventories shall be consulted as part of pre-activity survey procedures.

#### 7.1.4 Maintenance, Repair and Construction of Facilities

16. Maintenance, repair and construction Activities shall be designed and implemented to minimize new disturbance, erosion on manufactured and other slopes, and off-site degradation from accelerated sedimentation, and to reduce maintenance and repair costs.
17. Routine maintenance of all Facilities includes visual inspections on a regular basis, conducted from vehicles driven on the access roads where possible. If it is necessary to inspect areas which cannot be seen from the roads, the inspection shall be done on foot, or from the air.
18. When the view of a gas transmission line marker becomes obscured by vegetation on a regular basis requiring repeated habitat removal, consideration shall be given to the replacement of markers with taller versions.
19. Erosion will be minimized on access roads and other locations primarily with water bars. The water bars are mounds of soil shaped to direct flow and prevent erosion.
20. Hydrologic impacts will be minimized through the use of state-of-the-art technical design and construction techniques to minimize ponding, eliminate flood hazards, and avoid erosion and siltation into any creeks, streams, rivers, or bodies of water by use of Best Management Practices.

21. When siting new facilities, every effort will be made to cross the wetland habitat perpendicular to the watercourse, spanning the watercourse to minimize the amount of disturbance to riparian areas (See Figure 4).
22. Gas and other facilities cross streambeds and require maintenance and repair. During such times water may be temporarily diverted as long as after disturbance natural drainage patterns are restored to minimize the impact of the disturbance and help to reestablish or enhance the native habitat. Erosion control during construction in the form of intermittent check dams and culverts should also be considered to prevent alteration to natural drainage patterns and prevent siltation.
23. Impacts to wetlands shall be minimized by avoiding pushing soil or brush into washes or ravines.
24. During work on facilities, all trucks, tools, and equipment should be kept on existing access roads or cleared areas, to the extent possible.
25. Environmental Surveyor must approve of activity prior to working in sensitive areas where disturbance to habitat may be unavoidable.
26. Insulator washing is allowed from access roads if other applicable protocols are followed.
27. Brush clearing around facilities for fire protection shall not be conducted from March through August without prior approval by the Environmental Surveyor. The Environmental Surveyor will make sure that the habitat contains no active nests, burrows, or dens prior to clearing.
28. In the event SDG&E identifies a covered species of plant within a 10' radius around power poles, which is the area required to be cleared for fire protection purposes, SDG&E shall notify USFWS (for ESA listed plants), and CDFG (for CESA listed plants), in writing, of the plant's identity and location and of the proposed Activity, which will result in a Take of such plant. Notification will occur ten (10) working days prior to such Activity, during which time USFWS or CDFG may remove such plant(s). If neither USFWS or CDFG have removed such plant(s) within the ten (10) working days following the notice, SDG&E may proceed to complete its fire clearing and cause a Take of such plant(s).

When fire clearing is necessary in instances other than around power poles, and the potential for impacts to Covered Species exists, SDG&E will follow the preactivity study and notification procedures in Operational Protocol number 13.

29. Wire stringing is allowed year round in sensitive habitats if conductor is not allowed to drag on ground or in brush and vehicles remain on access roads.
30. Maintenance of cut and fill slopes shall consist primarily of erosion repair. In situations where revegetation would improve the success of erosion control, planting or seeding with native hydroseed mix may be done on slopes.
31. Spoils created during maintenance operations shall be disposed of only on previously disturbed areas designated by the Environmental Surveyor or used immediately to fill eroded areas. Cleared vegetation shall be hauled off the rights-of-way to a permitted disposal location.

32. Within 6 months of Plan approval, environmentally sensitive tree trimming locations will be identified in the tree trim computer data base system utilized by tree trim contractors. (This data base also tracks the date of each tree trim, type of tree, where threatening dogs reside, etc.). The Environmental Surveyor should be contacted to perform a preactivity survey when trimming is planned in environmentally sensitive areas. Whenever possible, trees in environmentally sensitive areas (determined by CDFG and SDG&E) will be scheduled for trimming in the non-sensitive times.
33. No new Facilities and Activities shall be planned which disturb vernal pools, their watersheds, or impact their natural regeneration. Continued historic maintenance of existing infrastructure utilizing existing access roads is allowed to continue in areas containing vernal pool habitat. New construction of overhead infrastructure which spans vernal pool habitats is allowed as long as the placement of facilities or the associated construction activities in no way impact the vernal pools.
34. If any previously unidentified dens, burrows, or plants are located on any project site after the preactivity survey, the Environmental Surveyor shall be contacted. Environmental Surveyor will determine how to best avoid or minimize impacting the resource by considering such methods as project or work plan redevelopment, equipment placement or construction method modification, seasonal/time of day limitations, etc...
35. The Environmental Surveyor shall conduct monitoring as recommended in the preactivity survey report. At completion of work, the Environmental Surveyor shall check to verify compliance, including observing that flagged areas have been avoided and that reclamation has been properly implemented. Also at completion of work, the Environmental Surveyor is responsible for removing all habitat flagging from the construction site.
36. The Environmental Surveyor shall conduct checks on mowing procedures, to ensure that mowing is limited to a 12-foot wide area on straight portions of the road (slightly wider on radius turns), and that the mowing height is no less than 4 inches.
37. Supplies or equipment where wildlife could hide (e.g., pipes, culverts, pole holes) shall be inspected prior to moving or working on them to reduce the potential for injury to wildlife. Supplies or equipment that cannot be inspected or from which animals could not be removed shall be capped or otherwise covered at the end of each work day. Old piping or other supplies that have been left open, shall not be capped until inspected and any species found in it allowed to escape. Ramping shall be provided in open trenches when necessary. If an animal is found entrapped in supplies or equipment, such as a pipe section, the supplies or equipment shall be avoided and the animal(s) left to leave on its own accord, except as otherwise authorized by CDFG.
38. All steep-walled trenches or excavations used during construction shall be inspected twice daily (early morning and evening) to protect against wildlife entrapment. If wildlife are located in the trench or excavation, the Environmental Surveyor shall be called immediately to remove them if they cannot escape unimpeded.
39. Large amounts of fugitive dust could interfere with photosynthesis. Fugitive dust created during clearing, grading, earth-moving, excavation or other construction activities will be controlled by regular watering. At all times, fugitive dust emissions will be controlled by limiting on-site vehicle speed to 15 miles per hour.

40. Before using pesticides in areas where burrowing owls may be found, a pre-activity survey will be conducted.

#### **7.1.5 Maintenance of access roads shall consist of:**

41. Repair of erosion by grading, addition of fill, and compacting. In each case of repair, the total area of disturbance shall be minimized by careful access and use of appropriately sized equipment. Repairs shall be done after preactivity surveys conducted by the Environmental Surveyor and in accordance with the recommendations regarding construction monitoring and relevant protocols. Consideration should be given to source of erosion problem, when source is within control of SDG&E.
42. Vegetation control through grading should be used only where the vegetation obscures the inspection of facilities, access may be entirely lost, or the threat of Facility failure or fire hazard exists. The graded access road area should not exceed 12'-wide on straight portions (radius turns may be slightly wider) (See Figure 23).
43. Mowing habitat can be an effective method for protecting the vegetative understory while at the same time creating access to a work area. Mowing should be used when permanent access is not required since, with time, total revegetation is expected. If mowing is in response to a permanent access need, but the alternative of grading is undesirable because of downstream siltation potential, it should be recognized that periodic mowing will be necessary to maintain permanent access.
44. Maintenance work on access roads should not expand the existing road bed (See Figure 23).
45. Material for filling in road ruts should never be obtained from the sides of the road which contain habitat without approval from Environmental Surveyor..

#### **7.1.6 Construction of new access roads shall comply with the following:**

46. SDG&E access roads will be designed and constructed according to the *SDG&E Guide for Encroachment on Transmission Rights-of-Way (4/91)*.
47. Access roads will be made available to managers of the regional preserve system subject to coordination with SDG&E.
48. New access roads shall be designed to be placed in previously disturbed areas and areas which require the least amount of grading in sensitive areas during construction whenever possible (See Figure 5). Preference shall be given to the use of stub roads rather than linking facilities tangentially.
49. SDG&E will consider providing access control on access roads leading into the regional preserve system where such control provides benefit to sensitive resources.
50. New access road construction is allowed year round. Every effort shall be made to avoid constructing roads during the nesting season. During the nesting season, the presence or absence of nesting species shall be determined by a biologist and appropriate avoidance and minimization recommendations followed.

### **7.1.7 Construction and Maintenance of Access Roads Through Streambeds**

51. Construction of new access roads through streambeds requires a Streambed Alteration Agreement from CDFG and/or consultation with the Army Corps of Engineers.
52. Maintenance or construction vehicle access through shallow creeks or streams is allowed. However, no filling for access purposes in waterways is allowed without the installation of appropriately sized culverts. The use of geotextile matting should be considered when it would protect wetland species.
53. Staging/storage areas for equipment and materials shall be located outside of riparian areas. (See Figure 23).

### **7.1.8 Survey Work**

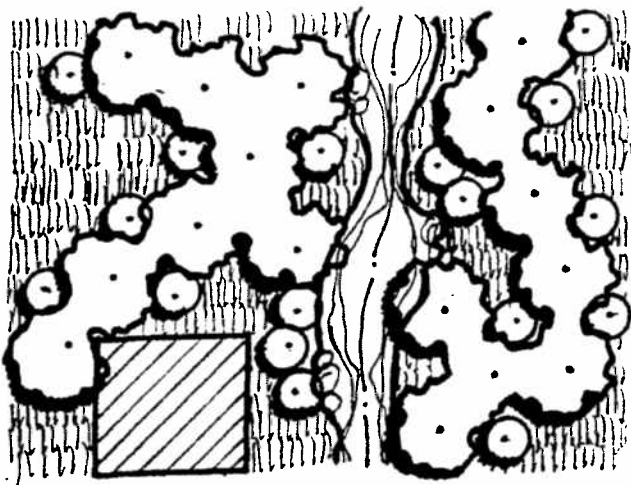
54. Brush clearing for foot paths or line-of-sight cutting is not allowed from March through August in sensitive habitats without prior approval from the Environmental Surveyor, who will ensure that activity does not adversely affect a sensitive species.
55. SDG&E survey personnel must keep vehicles on existing access roads. No clearing of brush for panel point placement is allowed from March through August without prior approval from the Environmental Surveyor.
56. Hiking off roads or paths for survey data collection is allowed year round so long as other protocols are met.

### **7.1.9 Emergency Repairs**

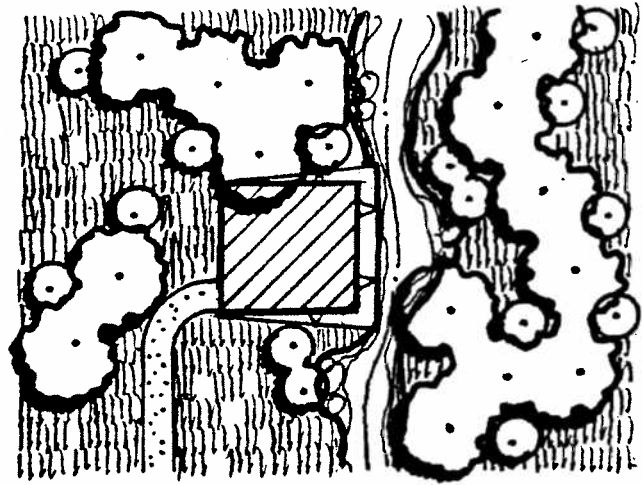
57. During a system emergency, unnecessary carelessness which results in environmental damage is prohibited.
58. Emergency repair of facilities is required in situations which potentially or immediately threaten the integrity of the SDG&E system, such as pipe leaks, or downed lines, slumps, slides, major subsidence, etc. During emergency repairs the Operational Protocols contained in this Subregional Plan shall continued to be followed to fullest extent possible.
59. Once the emergency has stabilized, any unavoidable environmental damage will be reported to the Environmental Surveyor by the foreman. The Environmental Surveyor will develop a mitigation plan and ensure its implementation is consistent with this Subregional Plan.

### **7.1.10 Activities of Underlying Fee Owners**

60. Most SDG&E rights-of-way are held in easement only. The activities of underlying fee owners cannot be controlled by SDG&E and are not covered by this Subregional Plan.
61. When sensitive habitat exists on either side of a utility right-of-way, SDG&E will not oppose underlying fee owners dedicating said property to conservation purposes. Underlying fee owners are expected to comply with applicable federal, state, and local regulations.

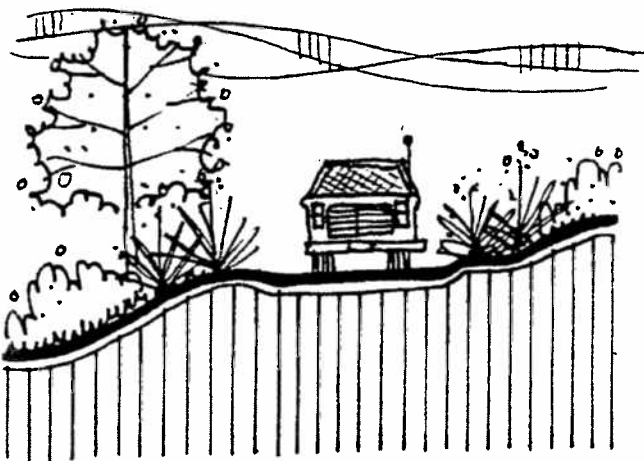


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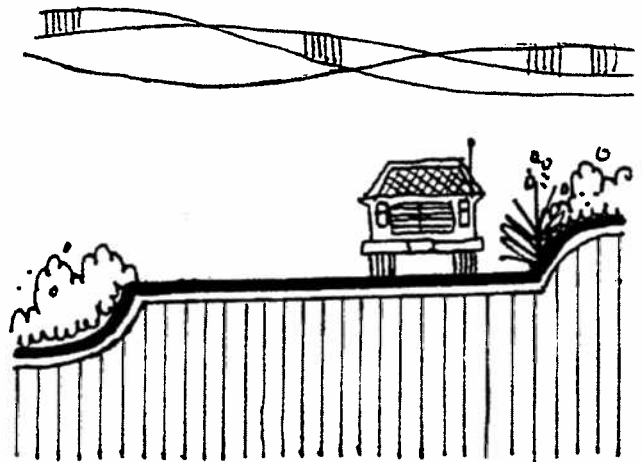


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**CONSTRUCTION STAGING/STORAGE AREAS SHOULD BE LOCATED OUTSIDE OF STREAMS**



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NOT THIS

**ACCESS ROAD MAINTENANCE SHOULD NOT EXPAND THE EXISTING ROAD BED**

FIGURE



1:1 level.<sup>2</sup> Under such circumstances, the mitigation requirement for impacts to vernal pools, with or without Covered Species present, will be the net of the total new impacts to vernal pools or pool complexes less the vernal pools or complexes being avoided within the existing roadway. The net impact will be mitigated at the pre-approved vernal pool mitigation area at a 2:1 ratio at least 1:1 ratio of which is creation.

Impacts to vernal pools with or without Covered Species present that occur on military lands will be mitigated at a pre-approved vernal pool mitigation area at a 3:1 ratio.

### **Monitoring and Reporting**

Restoration of temporary impacts to vernal pools shall be accomplished by a qualified ecologist/biologist and managed (including monitoring) for two subsequent wet seasons.

Restoration for permanent impacts to vernal pools shall be accomplished by a qualified ecologist/biologist and managed and monitored for a minimum of five years, but not to exceed seven years with at least one year in which the pool completely fills.

SDG&E's Subregional Plan Annual Report will include a vernal pool section that tracks and reports the amount and type (temporary or permanent) of impacts to vernal pools, and reports the status of restoration/enhancement efforts.

4. Add new Avoidance and Minimization protocols to Chapter 7.1 as a new Section 7.1.11 Vernal Pool Complexes:

#### **Avoidance and Minimization Measures:**

62. SDG&E will avoid permanent impacts to vernal pools in the construction of all new Facilities, including new access roads, throughout the area covered by this Plan.
63. If the Wildlife Agencies recommend relocation of an access road that bisects a vernal pool area, SDG&E will take into account cost and operational considerations and determine within 30 days whether to relocate the road. When roads are relocated to avoid vernal pools, the realigned road will be clearly demarcated and barriers will be placed to prevent vehicle access on the old road.
64. For all construction activities occurring adjacent to vernal pools, SDG&E will work with a qualified biologist having local experience with vernal pool resources, to site roads or facilities in a manner that avoids potential impacts to vernal pools. (See Figure 4.) All vernal pools adjacent to the project footprint, plus a five-foot buffer (where feasible), will be fenced with orange safety fencing to ensure no people or equipment impact the vernal pools during construction activities. A silt fence will be installed along the base of the roadway to prevent

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<sup>2</sup> This language is consistent with and replaces paragraph 2 of Article IX Vernal Pools of the Subregional Plan.

increased erosion or sedimentation during construction in vernal pool areas. Gravel bags will be placed along the bottom of the fence to minimize erosion or sedimentation into vernal pools, and removed upon completion of construction.

65. During operations and maintenance activities occurring within the footprint of existing access roads, which may include grading and/or crowning of those roads, permanent impacts to vernal pools may occur. To prevent water from ponding on existing access roads, SDG&E will grade and crown roads using a grader. Other mechanisms may be employed that achieve the same result. Thereafter, the roads will be maintained on a regular basis as determined by SDG&E, to prevent future ponding, thereby minimizing native plant and animal species from becoming established. Roads in vernal pool complex areas within MCAS Miramar and the Torrey Hills, Otay Mesa, Carmel Mesa, Del Mar Mesa, and Tierrasanta communities in the City of San Diego may be less frequently graded to preserve habitat value, but will be graded as needed to preserve safe and reliable access to SDG&E facilities.
66. During modifications and maintenance of existing access roads, or the creation of new access roads adjacent to vernal pools, a qualified biological monitor, having local experience with vernal pool resources, shall oversee and monitor all such activities occurring adjacent to vernal pools. The biological monitor shall:
- Hold a pre-construction meeting to brief the crew on the location of sensitive resources and construction boundaries.
  - Direct installation of protective fencing to prevent encroachment of people or equipment into vernal pools during construction activities and to ensure that no fence posts are placed within vernal pools.
  - If it is not feasible to place protective fencing without impacting vernal pools, during the dry season sandbags will be placed along the perimeter of the vernal pool and removed post-construction (or prior to the on-set of the wet season).

An environmental surveyor will ensure that fencing to protect vernal pools is appropriately placed and is maintained in good condition for the duration of the project. (See Figure 4.)

67. When vernal pools are located above gas lines and repair work is necessary, work areas will be minimized and soil will be stockpiled for replacement after repairs.
68. During construction of new facilities, including access roads adjacent to vernal pools, a biological monitor will document all accidental or unanticipated impacts to vernal pools. The impacts will be provided to the Wildlife Agencies in a post-construction report with 30 days of project completion.
69. To the extent feasible, all construction equipment shall be fueled and maintained at least 100 feet from the nearest vernal pools.