


SCE	Legal, Regulatory, and Compliance	Transmission & Distribution Utility Vegetation Management Program	Methodology	Doc. No.	UVM-20	 <div>SOUTHERN CALIFORNIA EDISON[®] Energy for What's AheadSM</div>
				Version	4	
Effective Date		3/24/25				
Supersedes		Version 3				
Structure Brushing						

UVM-20

Utility Vegetation Management

Structure Brushing



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1 Introduction

1.1 Purpose

For overall wildfire mitigation, including reducing the risk of ignition, fuel loading, and enhancing protection SCE maintains a 10-foot by 8-foot-high radial clearance firebreak around select accessible environmentally approved active distribution and transmission structures in the State Responsibility Area (SRA). Public Resource Code PRC 4292 requires that all “non-exempt” structures shall maintain this clearance during fire season.

As part of SCE's Wildfire Mitigation Plan (WMP) strategy, SCE applies the same standard of structure clearing (when achievable) to select Distribution and sub-Transmission structures in SCE's High Fire Risk Area (HFRA) regardless of exemption status, and volume of additional structures cleared beyond regulation PRC 4292 is managed by the VM Structure Brushing Program Owner in accordance with SCE's commitment in its annual WMP.

Brush clearing activities occur on active, accessible Distribution and/or transmission, State Responsibility Areas in addition to selected High Fire Risk Areas (HFTD Tiers 2 & 3) in SCE Service Territory with the intent of eliminating weeds, grass, and other flammable materials to bare soil via mechanical and/or chemical methods (when approved by applicable SCE Stakeholders) from 10-foot radius at ground level to a height of 8 feet.

1.2 Objectives


To clear a 10-foot by 8-foot-high radial clearance firebreak around all environmentally approved, accessible, active distribution and transmission structures in SRA and/or HFRA (as applicable), with emphasis on clearing non-exempt structures required by PRC 4292.

1.3 Exceptions

All structures, regardless of exception category require initial assessment to determine an exception applies.

Structures without surrounding vegetation do not require clearing (for example, structures set in cement). California Code of Regulations (CCR) Title 14 Section 1255 also provides limited exceptions to specific areas if fire will not propagate thereon. The following exceptions are taken from CCR 14 Section 1255 (C):

- fields planted to row crops;
- plowed or cultivated fields;
- producing vineyards that are plowed or cultivated;
- fields in nonflammable summer fallow;

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- irrigated pastureland;
- orchards of fruit, nut or citrus trees that are plowed or cultivated;
- Christmas tree farms that are plowed or cultivated; and
- swamp, marsh or bog land; and

The following exceptions are taken from CCR 14 Section 1255 (D):

- Where vegetation is maintained less than 30.48 cm (12 inches) in height, is fire resistant, and is planted for the specific purpose of preventing soil erosion and fire ignition.

Vegetation that is outside of the Structure Brushing contractor's capability to mitigate will require a Specialty Crew to remove.

- The structure brushing contractor shall annotate such conditions in the work management tool, which subsequently triggers work to the Specialty Crew.

All exception structures shall be documented in the work management tool.

Customer refusals to perform full or partial structure brushing for PRC 4292 non-exempt structures shall be documented in the work management tool and customers are notified via letter of the vegetation that requires clearing on their property.

On a semi-annual basis (January and July) the SCE Structure Brushing program manager shall provide a list to CALFIRE when PRC 4292 non-exempt structures are unable to be fully or only partially brushed due to customer refusals.


- The refusal list should be provided on an Excel spreadsheet via a shared SharePoint repository.

2 Applicability

This document is applicable all Contractors performing Structure Brushing for SCE.

3 Definitions

Refer to the NERC Glossary of Terms, E&C Shared Services Glossary of Terms (ECSS-02), and UVM Program Glossary of Terms (UVM-16) for any capitalized terms used in this document.

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4 Document Detail

4.1 Assessment Scope

All brush clearing activities occur on active, accessible Distribution and/or transmission, State Responsibility Areas in addition to selected High Fire Risk Areas (HFTD Tiers 2 & 3) in SCE Service Territory where an exception does not apply.

Structure brushing is performed annually for PRC 4292 non-exempt structures and twice annually for PRC 4292 structures which also reside in SCE's HFRA, based on access, resource availability and Wildfire Strategy Team recommendations.

4.2 Structure Brushing Clearance Detail / Documentation

For in-scope structures where environmental approval has been granted, clear a 10-foot by 8-foot high radial clearance firebreak to bare soil around structures.

Contractor is required to document structure brushing activities in the work management tool. Required documentation as a minimum shall include:

- Before and after photographs of structure condition with clear evidence brushing has met the clearance requirement
- Photograph of the Structure Identification (number plate)
- Any access attempts and/or customer communications
- Conditions when structure brushing cannot be achieved

4.3 Contractor Qualifications


Contractors should be knowledgeable on the current version of the California Power Line Fire Prevention Field Guide and have a thorough understanding of structure brushing regulation PRC 4292.

Contractor shall be required to maintain a current Qualified Applicators License (QAL) from the California Department of Pesticide Regulation to apply herbicides for SCE.

4.4 Contractor Responsibilities

After structure brushing, cleared brush shall be scattered/broadcast where allowed. Excessive brush that would require stacking shall be hauled away by contractor on the same day brushing is performed.

Following mechanical clearance, where permissible, herbicide spray shall be applied to cleared bare soil area to prevent regrowth.

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After performing inspection and clearing/treatment on structures, as part of the contractor QC process, the Contractor shall perform a 100% desktop review to assure the 10-foot by 8-foot clearance has been achieved, with specific emphasis on PRC 4292 non-exempt structures. This review shall include, but not be limited to, verification of photographic evidence adequacy and appropriate clearance after work completion. Any identified rework shall be performed at Contractor's expense.

Contractors are prohibited from performing any work that is on an Environmental Hold.

4.5 Clearance or Treatment Maintenance

All structures cleared or treated by Contractor are required to be maintained for a twelve (12) month period by the Contractor. Any structures that have regrowth shall be re-cleared/treated at Contractors expense, including any structures identified by SCE's QC inspectors as requiring rework.

All PRC 4292 structure clearances shall be performed in compliance with Public Resource Code 4292, California Code of Regulations Title 14: Section 1253, 1254, and 1255, as well as the latest version of the California Power Line Fire Prevention Field Guide.

The minimum firebreak and clearance provisions of PRC 4292-4296 are applicable during the declared California Department of Forestry and Fire Protection fire season for a respective county. The Director shall post the declaration on the official Department web site.

- Clearance of PRC 4292 non-exempt structures should be performed in advance of the fire season.
 - Clearance shall be performed in a manner to hold compliance for one year.
- PRC 4292 Exempt structures shall be cleared at least once annually, where environmentally approved and accessible.


4.6 Use of Herbicides¹

Herbicide is used where approved to treat the cleared 10-foot radius around the pole to prevent regrowth. Herbicide use must be approved by SCE's Environmental Department (ED), and the customer prior to application.

- The Contractor is required to maintain a current Qualified Applicators License (QAL) with the proper Category for the application type.

All Herbicide applications must follow a Pest Control Recommendation (PCR) written and signed annually by a

¹ California Department of Pesticide Regulation administers the regulation of herbicide use. The terms pesticide and herbicide are used interchangeably per the regulation. For SCE facilities, only herbicide is applied.

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Pest Control Advisor (PCA) for the treatments needed.

All applicators of Herbicides on SCE property or leased property must have a valid qualified applicator license (QAL) from the California Department of Pesticide Regulation.

All Herbicides used must be registered with the California Department of Pesticide Regulation and must be used in accordance with all applicable state, federal and local regulations as well as all requirements of the label.

Contractor shall report all Herbicide applications to all applicable state, federal, and local agencies under the required timelines.

Any Herbicide classified as a restricted material by the California Department of Pesticide Regulation shall not be used on SCE property or leased property.

Containers of Herbicide must not be stored on SCE property or leased property.

Applicators of Herbicide are responsible for the compliant disposal of any surplus herbicides or herbicide containers.


4.7 Contractor Quality Control (QC)

Within 10 days of completing structure brush clearing, the Contractor Supervisor is required to perform a 100% internal quality control (QC) verification to provide reasonable assurance that all data and documentation submitted to SCE is accurate. The work management tool must be updated to document the QC performed.

- Only users with the Role of 'Supervisor' can perform QC reviews
- Each record shall be reviewed individually for accuracy and completeness
- QC Supervisors performing reviews must read and understand the CA Power Line Fire Prevention Field Guide
- QC Supervisor is certifying the structure meets compliance to PRC 4292

4.8 Environmental Review

SCE's Environmental Department (ED) must review and approve all structures prior to work performed. Contractor may not perform any type of vegetation management work until documented approval from ED is received through the work management tool

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- Contractor must comply with SCE's environmental programs, procedures, and standards, including but not limited to SCE's Avian Protection Program and SCE's most recent Environmental Handbook for Contractors
- Contractor must comply with applicable federal, state, and local environmental regulations and applicable SCE programmatic agreements with public agencies
- Upon contract award, Contractor will prepare an Environmental Compliance Plan. The Plan shall include (but not be limited to) the following elements related to environmental compliance: roles and responsibilities, processes, training, supervisory oversight, and incident investigation and reporting.
- Contractor will abide by all avoidance and minimization measures contained in the environmental requirements issued by ED. If the project scope changes from that originally reviewed and cleared by ED, or avoidance measures cannot be undertaken as planned, create safety hazards for the work crew, or create conflicts with project objectives, the Contractor shall immediately contact the Authorized Edison Representative for additional guidance before proceeding with work
- Contractor will develop and ensure completion of environmental awareness training for Contractor employees and Subcontractors on an annual basis (or as needed for newly onboarded employees and Subcontractors), and retain documentation that provides proof of training completion


4.9 Embedded Environmental Requests

Vegetation Management (VM) and ED developed a process to provide VM and ED staff and contractors instructions on how to request embedded Environmental monitor support, where needed. "Embedded" means the environmental monitor is scheduled to perform pre-activity surveys the same day and time as the VM contractor. The Process for Embedded Environmental Requests can be found in Attachment D.

4.10 Structure Brushing Inventory Planning and Execution

VM and ED developed the Structure Brushing (SB) Planning and Execution Process flow which provides steps for:

- Using the Fulcrum SB App to screen inventory using Environmental Seasonality data and the Environmentally Sensitive Area (ESA) GIS layers.
- Using the Fulcrum SB App to provide corrected structure location data, confirmation of access and condition of structure and site, date last time brushed, no brushing requirements, exemption status, & wildfire program priority information.
- Scheduling brushing of exempt structures outside of seasonal environmental field support timeframes
- The SB Inventory Planning and Execution process can be found in Attachment E.

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4.11 PRC 4295 Trespassing and Reasonable Effort

A person is not required by Section 4292 or 4293 to maintain any clearing on any land if such person does not have the legal right to maintain such clearing, nor do such sections require any person to enter upon or to damage property which is owned by any other person without the consent of the owner of the property.

In accordance with the California Power Line Fire Prevention Field Guide:

- *“PRC 4295 recognizes private property rights by not requiring trespass if that is the only way in which clearance requirements can be maintained.*
- *It is not, however, intended as a loophole. Utilities are expected to make a reasonable effort to secure permission to undertake clearances, and if unsuccessful, they are expected to report their access problems to the responsible fire protection agency. The fire protection agency can then attempt to persuade the property owner to allow clearing.”*


Courtesy Customer Notification, photographed door hanger, phone call attempt and letter are considered “reasonable effort” *(where available and safe to attempt)*.

4.12 Structure Brushing Training

On an annual basis and upon new contract awards, structure brushing training shall be provided to all structure brushing contractors.

5 Approvals

Compliance Program Owner	Signature	Date
[NAME REMOVED], Senior Manager	[NAME REMOVED]	3/17/25

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6 Revision History

Revision Number	Date	Description of Revision	By	Next Review Date
0	5/18/21	Initial release for UVM Program	[NAME REMOVED]	5/18/22
1	12/1/23	Changed Pole to Structure General document refresh Provided clarification for refusals and documentation to CALFIRE	[NAME REMOVED]	12/1/24
2	1/29/24	Added Attachment B & C	[NAME REMOVED]	1/29/25
3	9/10/24	Revised Attachments B & C	[NAME REMOVED]	9/10/25
4	3/24/25	General document refresh. Added sections 4.9, 4.10 and Attachments D & E	[NAME REMOVED]	3/24/26

7 References

External References

- California Code, Public Resource Code – PRC § 4292
- California Power Line Fire Prevention Field Guide
- NERC Glossary of Terms

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Internal References

UVM-16, UVM Program Glossary of Terms

8 Distribution and Data Retention

The official version of the document shall be stored in the T&D Vegetation Management UVM Program SharePoint Document Library while in effect and retained for at least ten (10) years thereafter.

Distribution list:


- T&D VM Managers
- E&C Program Management Office
- Impacted OU Touchpoints

9 Key Contacts

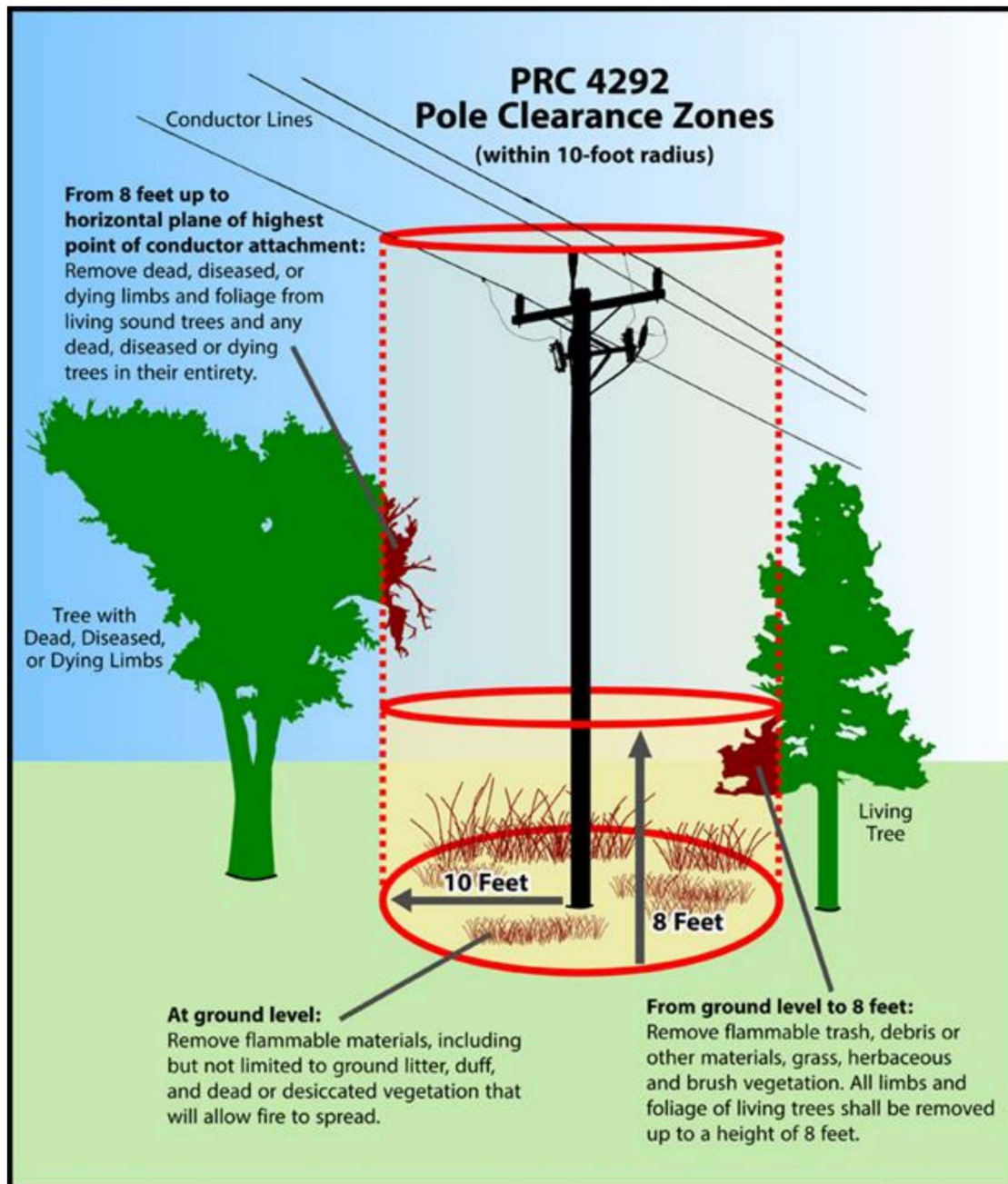
- UVM Structure Brushing Program Owner, [NAME AND PHONE NUMBER REMOVED]
- UVM Principal Manager, Operations: [NAME AND PHONE NUMBER REMOVED]
- UVM Senior Manager, Regulatory and Compliance: [NAME AND PHONE NUMBER REMOVED]
- UVM Senior Manager, Business Performance Management: [NAME AND PHONE NUMBER REMOVED]


10 Attachments

- Attachment A – Brush Removal Requirements
- Attachment B – Refusal Letter (example)
- Attachment C – No Access Letter (example)
- Attachment D – Process for Embedded Environmental Requests
- Attachment E – Structure Brushing Inventory Planning and Execution

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Attachment A
Brush Removal Requirements



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Attachment B Refusal Letter



Vegetation Management Compliance and Support
VMSB@sce.com (833) 744-1393 Ext. 2

Month, Day, Year

Property Owner Name
Property Owner Mailing Address
City, State, Zip

SUBJECT: Notice of Vegetation Management Refusal

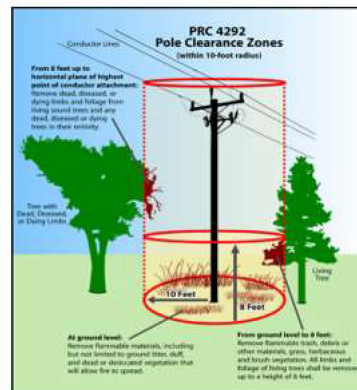
Subject Address: Address -Location of physical structure/pole
APN:00000000
Structure #: 1234567E

Dear Property Owner:

Southern California Edison (SCE) is committed to protecting public safety, maintaining electric reliability, and reducing the risks of wildfire. We have determined that an electrical structure is located on your property and requires inspection to mitigate potential wildfire risk.

On «customer_phone_contact_date» SCE-authorized Structure Brushing crews attempted to perform required vegetation management work at the address above but were refused access or permission to perform the work.

To meet regulation requirements SCE is required to maintain a 10 ft. radial clearance and 8 ft. clearance in height around certain poles and towers (reference image). To date, we have been unable to schedule an appointment to perform this inspection or work to maintain the required fire protection around our equipment. This work will be completed **at no cost to you.**




As set forth in the CAL FIRE Power Line Fire Prevention Field Guide, utilities are expected to make a reasonable effort to secure permission to undertake clearances, and if unsuccessful, they are expected to report their access problems to the responsible fire protection agency.

If you would like to provide consent and access, please contact SCE within ten (10) business days of «letter_mailed» via email at VMSB@sce.com or by phone at (833) 744-1393 Ext. 2, between 8:00AM and 3:00PM Monday through Friday.

Sincerely,

Vegetation Management Team

EXAMPLE

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Attachment C
No Access Letter (Page 1 of 2)



Vegetation Management
Compliance
VMSB@sce.com

Month Day, Year
«property_owner_name»
«house_street»
«city», «state» «zip»

SUBJECT: Request to Access Property for Electrical Pole Inspection for Vegetation Management in CAL Fire State Responsibility Area

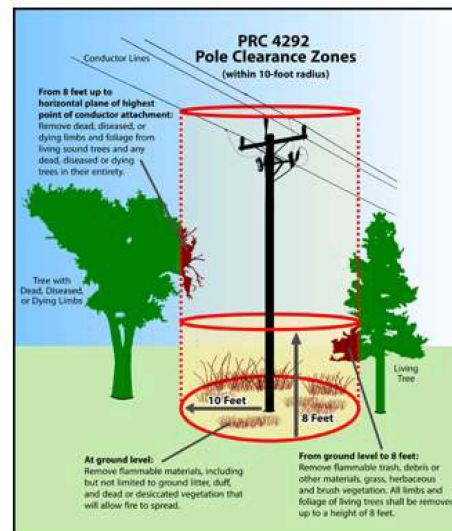
Subject Address: «address_sub_thoroughfare» «address_thoroughfare»
«address_locality», «address_admin_area» «address_postal_code»
APN: «apn»
Structure #: «structure_id»

Dear Property Owner:


Southern California Edison (SCE) is committed to protecting public safety, maintaining electric reliability, and reducing the risks of wildfire. We have determined an electrical pole is located on your property and requires yearly inspection to mitigate potential wildfire risk.

On «customer_phone_contact_date» SCE authorized Structure Brushing Crews notified you via doorhanger regarding the need for vegetation inspection that must be completed and documented as compliant to maintain public safety. To meet the regulation requirements SCE is required to have a 10 ft. radial clearance around the pole and 8 ft. clearance in height. To date, we have been unable to reach you to schedule an appointment to perform this required inspection or work to maintain the required fire protection around our equipment.

Please note that your property is located within a state designated High Fire Risk Area and it has been determined that an electrical pole on your property may have vegetation that could be hazardous and pose a potential wildfire risk.



EXAMPLE

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Attachment C

No Access Letter (Page 2 of 2)

California Public Resources Code 4292 states the following:

"Except as otherwise provided in Section 4296, any person that owns, controls, operates, or maintains any electrical transmission or distribution line upon any mountainous land, or forest-covered land, brush-covered land, or grass-covered land shall, during such times and in such areas as are determined to be necessary by the director or the agency which has primary responsibility for fire protection of such areas, maintain around and adjacent to any pole or tower which supports a switch, fuse, transformer, lightning arrester, line junction, or dead end or corner pole, a firebreak which consists of a clearing of not less than 10 feet in each direction from the outer circumference of such pole or tower. This section does not, however, apply to any line which is used exclusively as telephone, telegraph, telephone or telegraph messenger call, fire or alarm line, or other line which is classed as a communication circuit by the Public Utilities Commission. The director or the agency which has primary fire protection responsibility for the protection of such areas may permit exceptions from the requirements of this section which are based upon the specific circumstances involved."

SCE requests your cooperation in allowing us to complete this important vegetation management work, which, of course, **will be of no cost to you.**

To provide access information and consent to perform vegetation management activities, please contact the SCE contractor within ten (10) business days of this letter at **contractor phone number** or email contractoremail.com

If you have questions for SCE regarding the required inspection on your property, or any other concerns please contact SCE at VMSB@sce.com.


Property owners have the right to refuse permission to undertake clearances. As set forth in the CAL FIRE Power Line Fire Prevention Field Guide, utilities are expected to make a reasonable effort to secure permission to undertake clearances, and if unsuccessful, they are expected to report their access problems to the responsible fire protection agency.

For additional information please visit [Utility Wildfire Mitigation | OSFM \(ca.gov\)](#)

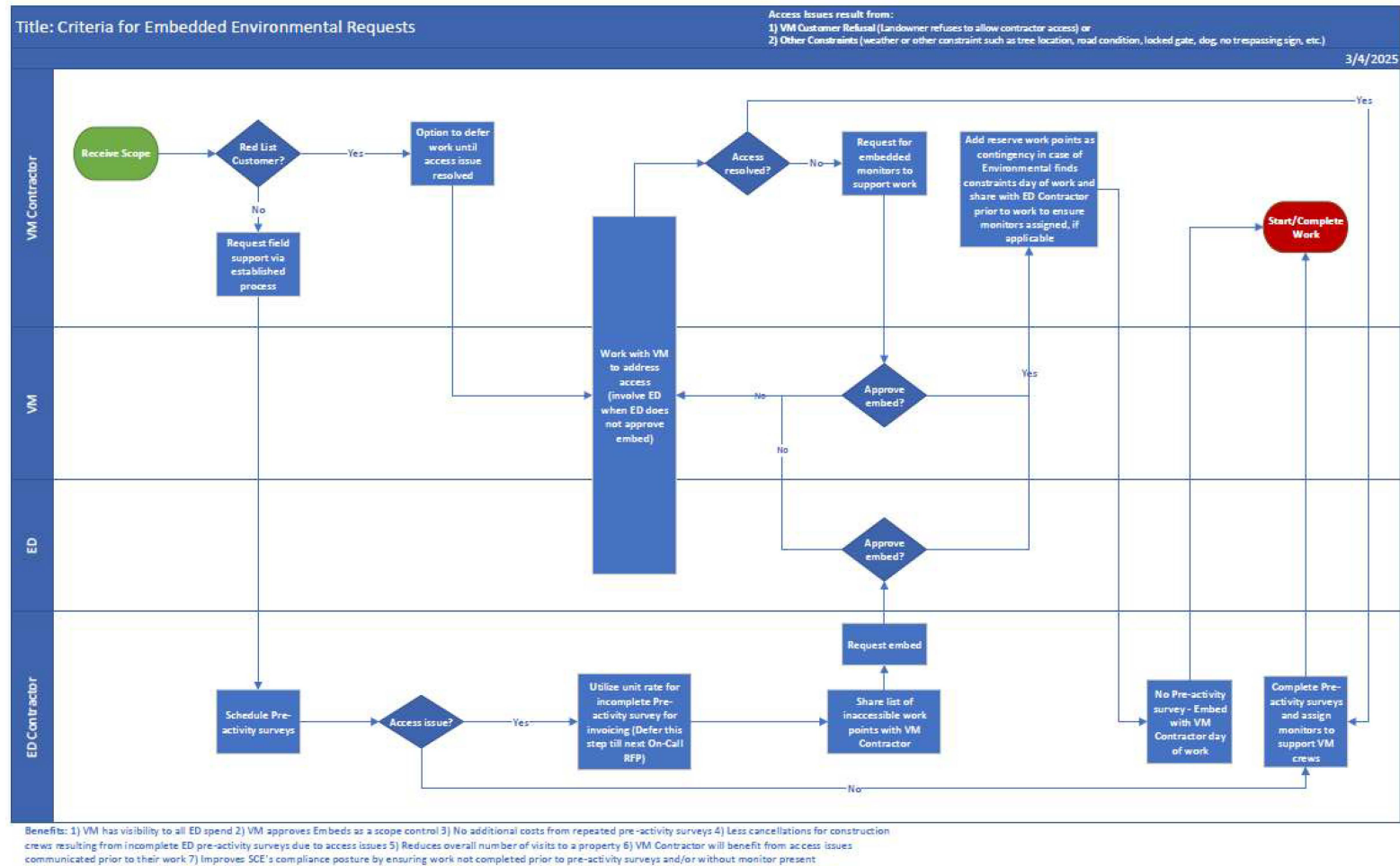
Sincerely,

Vegetation Management Compliance Team


EXAMPLE

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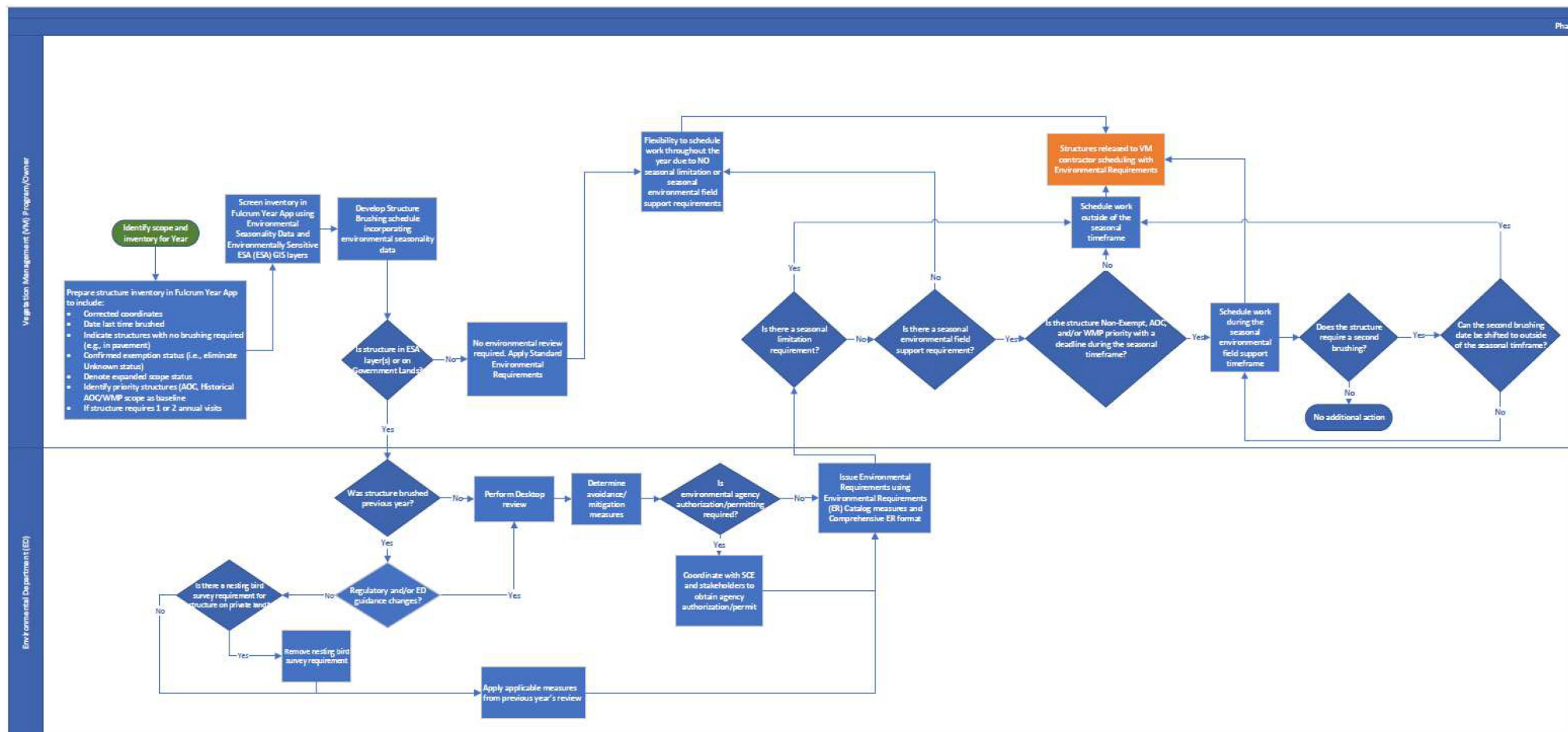
Attachment D: Process for Embedded Environmental Requests



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Attachment E: Structure Brushing Inventory Planning and Execution



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