Appendix V

FIRE MANAGEMENT AND PREVENTION PLAN

Fire Management and Prevention Plan

Easley Renewable Energy Project

Prepared for

Intersect Power

IP Easley, LLC

a subsidiary of Intersect Power, LLC

Submitted by

Aspen environmental group

August 2023

Agency Review Status
Bureau of Land Management
Riverside County Fire

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1. INTRODUCTION

The objective of the Fire Management and Prevention Plan (Fire Plan) is to provide safe procedural practices, environmental protection measures, and other specific stipulations and methods to prevent and respond to fires during construction and operation of the Easley Renewable Energy Project (Project).

This Fire Plan identifies measures to minimize fire risk during construction and operational activities associated with the solar facility, gen-tie line, and associated components. It will be the responsibility of the Proponent and its Project contractors, working with designated environmental inspectors, to comply with measures identified in this Fire Plan. The BLM is responsible for responding to wildfires located within BLM Direct Protection Areas in conjunction with the Riverside County Fire Department (RCFD) and California Department of Forestry and Fire Protection (CAL FIRE) as applicable, for the Project. IP Easley, LLC (or the Project operator at the time), the Engineering, Procurement, and Construction (EPC) Contractor, and all personnel working at the Project site are advised to stay in touch with local fire dispatch offices via the E-911 system to be of service and for personal safety.

1.1. Regulatory Requirements

The proposed Project is located entirely within an area designated as Federal Responsibility Area (FRA), with some adjacent areas of Local Responsibility Area (LRA) (CAL FIRE, 2007; County of Riverside, 2019). Agencies that are likely to provide wildfire protection to the Project would be RCFD and BLM Fire and Aviation Program. Because the Project is not located in a State Responsibility Area, CAL FIRE would not have primary responsibility for fire management or suppression activities in this area. While individual fire agencies have primary responsibility for specific geographic areas, under interagency cooperative and mutual aid agreements, fire agencies throughout the region aid each other as needed. According to the CAL FIRE Fire Hazard Severity Zones (FHSZ) Map and County of Riverside General Plan Safety Element the Project would be in an area of Moderate FHSZ (CAL FIRE, 2020; County of Riverside, 2019). There is limited potential for wildfire on the site due to sparse vegetation. The Project is located adjacent to the Lake Tamarisk Community, which is within a Local Responsibility Area.

The Riverside County Fire Department Technical Policy TP-15-002, titled Solar Energy Generating System (SEGS) Fire Apparatus Access Roads, is a standard that was developed to assist with the design of fire apparatus access roads from public roadways to a SEGS (i.e., solar facility). It addresses secondary access road requirements, which shall be determined by the County Fire Marshal given the specific conditions of any given solar project (Riverside County Fire Department, 2020). Each SEGS project will be reviewed on a case-by-case basis to determine secondary fire apparatus access requirements to facilitate emergency operations and to minimize the possibility of an access point being subject to congestion or obstruction during an emergency incident. This standard states that the secondary access road shall not be less than 20 feet in width and shall have an unobstructed vertical clearance of no less than 13 feet, 6 inches. The grade of the access road shall not exceed 15 percent. The access road shall be designed, constructed, and maintained to support the imposed load of fire apparatus weighing at least 75,000 pounds and constructed to Riverside County Transportation Standards. A registered engineer shall certify the design and construction of the access road based on the fire apparatus-imposed load of 75,000 pounds.

1.2. Mitigation Measures

This Fire Plan has been prepared to proactively address potential impacts to wildland fire that may result from the Project to help prevent fire-related loss of life, property, and resource damage and to manage fire risk during construction. Fire management and prevention will also be addressed in future mitigation measures that will be incorporated in all Project engineering, procurement, and construction contract(s)

that will reference or clearly state any fire prevention requirements. Based on approved solar projects in the Desert Center area, these measures should include:

- Procedures for minimizing potential ignition, including, but not limited to, vegetation clearing, parking requirements/restrictions, idling restrictions, smoking restrictions, proper use of gas-powered equipment, and hot work restrictions.
- Work restrictions during Red Flag Warnings and High to Extreme Fire Danger days.
- All internal combustion engines used at the Project site shall be equipped with spark arrestors. Spark arrestors shall be in good working order.
- Once initial two-track roads have been cut and initial fencing completed, light trucks and cars shall be used only on roads where the roadway is cleared of vegetation. Mufflers on all cars and light trucks shall be maintained in good working order.
- Fire rules shall be posted on the Project bulletin board at the contractor's field office and areas visible to employees.
- Equipment parking areas and small stationary engine sites shall be cleared of all flammable materials.
- Smoking shall be prohibited in all vegetated areas and within 50 feet of combustible materials storage, and shall be limited to paved areas or areas cleared of all vegetation.
- Each construction site (if construction occurs simultaneously at various locations) shall be equipped with fire extinguishers and fire-fighting equipment sufficient to extinguish small fires.
- The Project owner shall coordinate with the BLM and RCFD to create a training component for emergency first responders to prepare for specialized emergency incidents that may occur at the Project site, including incidents such as fire or explosion at or with the BESS.
- The plan shall include information about the type of BESS technology on site, potential hazards, and procedures for disconnecting or shutting down the BESS in case of fire or to reduce the chance of fire.
- All construction workers, plant personnel, and maintenance workers visiting the plant and/or transmission lines to perform maintenance activities shall receive training on fire prevention procedures, the proper use of fire-fighting equipment, and procedures to be followed in the event of a fire. Training records shall be maintained and be available for review by the BLM and RCFD. Fire prevention procedures shall be included in the Project's Worker Environmental Awareness Program (WEAP).
- Vegetation near all solar panel arrays, ancillary equipment, and access roads shall be controlled through periodic cutting and spraying of weeds, in accordance with the Weed Management Plan.
- The BLM and RCFD shall be consulted during plan preparation and fire safety measures recommended by these agencies included in the plan.
- The plan shall list fire prevention procedures and specific emergency response and evacuation measures that would be required to be followed during emergency situations.
- All on-site employees shall participate in annual fire prevention and response training exercises with the BLM and RCFD.
- The plan shall list all applicable wildland fire management plans and policies established by state and local agencies and demonstrate how the Project will comply with these requirements.
- The Project owner shall designate an emergency services coordinator from among the full-time on-site employees who shall perform routine patrols of the site during the fire season equipped with a portable fire extinguisher and communications equipment. The Project owner shall notify the BLM and RCFD of

the name and contact information of the current emergency services coordinator in the event of any change.

- Remote monitoring of all major electrical equipment (transformers and inverters) will screen for unusual operating conditions. Higher than nominal temperatures, for example, can be compared with other operational factors to indicate the potential for overheating which under certain conditions could precipitate a fire. Units could then be shut down or generation curtailed remotely until corrective actions are taken.
- Fires ignited on site shall be immediately reported to BLM and the RCFD.
- The engineering, procurement, and construction contract(s) for the Project shall provide reference to or clearly state the requirements of this mitigation measure.
- The Project owner must provide the Fire management and Prevention Plan to the BLM for review and approval and to the Riverside County Fire Department (RCFD) for review and comment before construction.

2. REGIONAL SETTING AND PROJECT DESCRIPTION

2.1. Regional Setting

The Easley Renewable Energy Project is located on private and BLM-administered land in Riverside County, north of I-10 and approximately 2 miles north of the town of Desert Center, California. A generation-tie (gen-tie) line would mainly traverse across the Oberon Renewable Energy Project site and connect into an approved substation that is under construction on the approved Oberon Project site. From the Oberon Substation, energy generated by the Easley Project would be transmitted to the SCE Red Bluff Substation on the existing, approved Oberon 500 kV gen-tie line. The Project site is located on four 7.5 Minute U.S. Geological Survey topographic quadrangles: East of Victory Pass, Victory Pass, Corn Springs, and Desert Center.

The public lands within the Project solar application area are designated as Development Focus Area (DFA) by the Desert Renewable Energy Conservation Plan (DRECP) and associated Record of Decision (ROD), and thus, have been targeted for renewable energy development. Because the proposed Project is partially located on federal land under management of the U.S. Bureau of Land Management (BLM), the

The Project site is relatively flat. Vegetation communities at the Project site are generally limited to scattered creosote brush scrub and desert dry wash woodland. Land uses near the Project include active and fallow agriculture, the community of Lake Tamarisk, scattered residences, renewable energy, energy transmission, historical military operations, and recreational development and use. Several solar and energy storage facilities exist, are under construction, or are proposed in the vicinity of the Easley Project. Solar projects that are under construction nearby include the Oberon Renewable Energy Project to the southeast and the Arica and Victory Pass Solar Projects to the southeast.

The Riverside County General Plan Safety Element identifies areas with rugged topography and flammable vegetation as being susceptible to fire hazards. According to CAL FIRE, the Project is not located within any FHSZ due to the lack of dense flammable vegetation and steep slopes (CAL FIRE, 2020). According to the Wildfire Susceptibility Map in the Riverside County General Plan Safety Element, very high FHSZs in Local, State, and Federal Responsibility Areas are concentrated in the western portions of Riverside County (County of Riverside, 2019). The Project would be located in Moderate FHSZ in Local and Federal Responsibility Areas. Since the Project is not located in a State Responsibility Area, CAL FIRE would not be responsible for fire management or suppression activities in this area. This responsibility falls to BLM,

although agencies cooperate in fire incident responses. Agencies that are likely to provide wildfire protection to the Project would be the Riverside County Fire Department and BLM Fire and Aviation Program.

2.2. Project Description

IP Easley, LLC (Applicant or Proponent), a subsidiary of Intersect Power, LLC, proposes to construct, operate and decommission the Easley Renewable Energy Project (Easley or Project), a utility-scale solar photovoltaic (PV) electrical generating and storage facility, and associated infrastructure to generate and deliver renewable electricity to the statewide electricity transmission grid.

The proposed Project application area is located on approximately 3,735 acres of private and BLM-administered land, in Riverside County north of Desert Center, California. The Project would generate and store up to 650 megawatts (MW) of renewable electricity via arrays of solar photovoltaic (PV) panels, battery energy storage system (BESS), and appurtenant facilities. A 6.7-mile 500 kilovolt (kV) generation-tie (gen-tie) line would mainly traverse across the Easley Project site and connect into an approved substation that is under construction on the approved Oberon Renewable Energy Project site, an adjacent solar and energy storage facility owned by Intersect Power. From the Oberon onsite substation, the power generated by the Easley Project would be transmitted to the SCE Red Bluff Substation via the Oberon 500 kV gen-tie line, which is expected to be online by the end of 2023.

An Operation and Maintenance (O&M) building will be constructed at the Project site. The building will be designed for Project security, employee offices, and parts storage. The approximately 3,000 square-foot O&M building will be approximately 15 feet at its tallest point. The building will be constructed on a concrete foundation with its exterior color to be determined in coordination with the BLM. Electrical power for the O&M building and substation will be supplied via a new overhead or underground 12 kV distribution line extending from the existing SCE distribution system adjacent to the solar facility site.

Construction would occur over approximately 24 months. The Project would operate for a minimum of 35 years and up to 50 or more years. At the end of the Project's useful life, the Project would be decommissioned and the land returned to its pre-Project conditions.

3. METHODS

3.1. Fire Prevention and Risk Reduction Responsibilities

Implementation of the Fire Plan is the responsibility of all facility employees and contractors, in cooperation with BLM and RCFD. This plan is subject to revision if there is a change of ownership, a natural disaster, and/or construction or decommissioning activities that have the potential to alter site conditions in ways that affect fire risk and fire management.

All Project employees and contractors are required to demonstrate knowledge of the elements of the Fire Plan and to carry out responsibilities as outlined below.

Emergency Services Coordinator

Emergency Services Coordinator will be responsible for the following safety measures:

- Be in charge of overseeing the Fire Plan implementation
- Train assigned employees in the safe storage, use and handling of flammable materials, the use of firefighting equipment to fight incipient-stage fires, and the requirements of this fire plan

- Ensure that flammable material storage areas are properly maintained
- Ensure that fire control equipment and systems are properly maintained
- Manage fire fuel source hazards
- Perform routine patrols of the site during fire season equipped with a portable fire extinguisher and communications equipment
- Monitor fire weather conditions (red flag days and other fire danger designations) and restrict activities during such conditions
- Maintain contacts with area fire agencies. The BLM and RCFD will be notified of the name and contact information of the current emergency services coordinator in the event of any change.
- Ensure that appropriate training for all employees and regular site contractors is implemented annually to ensure all personnel are adequately prepared in the event of an emergency, and document that training has occurred. (See Appendix A for Fire Plan Training Log).

Employees and Contractors

Employees and contractors will be responsible for the following safety measures:

- Complete all required training
- Conduct construction activities safely to limit the risk of fire
- Report potential fire hazards to their supervisors
- Follow fire emergency procedures

4. CONSTRUCTION ACTIVITIES

4.1. Fire Hazard Control

During construction, fires could be caused by a variety of factors, including vehicle exhaust, sparks associated with grading activities, welding activities, parking on dry vegetation, and the overall temporary increase in human activity. Accidental ignition could result in a fire, which, depending on the location, could spread. The consequences of a such a fire could be severe depending on weather conditions at the time and the ability of on-site firefighting personnel to quickly respond to the fire.

Pursuant to the Code of Federal Regulations, Title 29, Part 1926.24 (29 Code of Federal Regulations [CFR] 1926.24), the Project operator would be responsible for the development and maintenance of an effective fire protection and prevention program through all phases of construction, repair, alteration, or demolition work for the solar facility, Battery Energy Storage System (BESS), Project substation, gen-tie line, and associated components. The Project operator would ensure the availability of the fire protection and suppression equipment required by this regulation.

Fire protection and suppression equipment during construction and operations will include water trucks with hoses, fire extinguishers, and shovels.

In addition, the Project owner and/or EPC contractor would present basic fire-prevention training to all personnel working at the Project site, maintain documentation of all training, and implement the following:

- All employees, contractors, and employees of contractors will do everything reasonable within their power, expertise, and assessment of human safety, both independently and upon request of the BLM

and RCFD, to prevent and suppress fires resulting from construction or maintenance activities of the Project. If the Project operator suppresses fire, the operator will report its occurrence to BLM and RCFD. The operator is responsible for all suppression costs and resource damage rehabilitation costs resulting from the suppression of any fire resulting from its operations and practices.

- The operator must ensure that each employee, subcontractor, or any other individual or company working on the Project site is aware of the provisions of this fire plan, is familiar with the location and proper use of firefighting equipment and conducts themselves in a fire-safe manner.
- Vegetation will be removed prior to construction to minimize fire risk. Measures to minimize fire risk will include removal of dry vegetation and/or other combustible materials within 30 feet of any hazardous material storage, compressed gas storage, or equipment/vehicle that has the potential to spark a fire.
- All electric inverters and the transformer would be constructed on concrete foundation structures or steel skids and tested prior to use to ensure safe operations and avoid fire risks.

4.2. Red Flag Warnings and Very High or Extreme Fire Danger Days

A Red Flag Warning is issued for weather events which may result in extreme fire behavior within 24 hours. Upon issuance of a Red Flag Warning, the Emergency Service Coordinator will coordinate with BLM to determine if any Project activities are allowed to continue under these conditions.

CAL FIRE assists Local and State Responsibility Area agencies by notifying utility companies on Very High and Extreme fire danger days. These days may or may not coincide with the Red Flag Warning days. A communications link will be established between the CAL FIRE and Riverside County Unit Command Centers and the Project for these notifications. During Very High and Extreme fire danger days, local weather parameters reach the 90th percentile of fire danger, identifying the areas as severe fire hazards.

If either a Red Flag Warning and/or Very High or Extreme fire danger days are issued for the Project area, construction activities will be limited to work in areas previously cleared of vegetation. No welding is allowed to occur during these conditions without authorization from BLM and RCFD.

4.3. Welding and Cutting

Welding operations are subject to the following provisions:

- No welding can occur when winds are over 15 miles per hour, and
- Welding will occur only in areas cleared of all flammable vegetation and materials at a minimum radius of 30 feet from the welding operation.
- A fire-patrol person/fire watch will be designated to observe and monitor the area for potential fire ignition during and for at least 1 hour after welding is completed.
- Welding rigs will be equipped with a minimum of one 20 pound or two 10-pound fire extinguishers, and a minimum of 5 gallons of water in a pressurized water tank.

Appropriate hot work permits/approvals (for activities such as welding and metal cutting) will be obtained from the jurisdictional fire agency, Riverside County/CAL FIRE.

4.4. Equipment Operation and Storage

All internal combustion construction equipment and construction vehicles will be equipped with an acceptable muffler and effective spark arresters in proper working order. All equipment and work vehicles

will be required to carry shovels (size "O" or larger and not less than 46 inches in overall length) and one 5-pound ABC fire extinguisher.

Construction staging areas, worker parking areas, and access roads will be designated and cleared of vegetation. No parking or construction activities will be allowed in non-designated areas. Vehicle idling will be limited.

4.5. Storage, Use, and Handling of Oils, Flammable Liquids, Hazardous Materials, and Vehicle Fuels

Fuels, and flammable materials, if required, will be in accordance with all applicable state and federal laws. Refer to the Hazardous Materials Management Plan, which established standard procedures for reporting, handling, disposal, and cleanup of hazardous material spills and releases.

4.6. Smoking and Fire Rules

Smoking shall be prohibited in all vegetated areas and within 50-feet of combustible materials storage and limited to paved areas or areas cleared of all vegetation.

Fire rules will be posted on the Project bulletin board at the contractor's field office and areas visible to employees. All construction workers, plant personnel, and maintenance workers visiting the transmission lines to perform maintenance activities will receive training on the procedures to be followed in the event of a fire. Training records will be maintained and available for review by the BLM and RCFD.

4.7. Firefighting Equipment

4.7.1. Fire Extinguishers

A portable fire extinguisher is very effective when used for combating incipient-stage fires. The use of a fire extinguisher that matches the class of fire and is operated by a person who is well trained can save both lives and property. Locations of portable fire extinguishers (5-pound Class A-B-C at minimum) will be placed at, but not limited to, each construction site (if construction occurs simultaneously at various locations), office spaces, hot work areas, flammable storage areas, and mobile equipment such as work trucks or other vehicles. All fire-fighting equipment will be marked conspicuously and be accessible.

It is the responsibility of the Environmental Service Coordinator to oversee the inspection, maintenance, and testing of fire extinguishers to ensure that they are in proper working condition and maintained in accordance with local and federal Occupational Safety and Health Administration (OSHA) requirements and have not been tampered with or physically damaged.

4.7.2. Water

The contractor shall furnish water trucks with hoses. The trucks may serve a dual purpose. The truck may be used to spray water on roads and work areas to suppress dust per Fugitive Dust Control Plan requirements.

5. OPERATIONS, MAINTENANCE AND DECOMMISSIONING ACTIVITIES

5.1. Fire Prevention and Risk Reduction Responsibilities

Solar arrays and PV modules are fire-resistant, as they are constructed largely of steel, glass, aluminum, or components housed within steel enclosures. As the tops and sides of the panels are constructed from glass and aluminum, PV modules are not vulnerable to ignition from firebrands from wildland fires. In a wildfire situation, the panels would be rotated and stowed in a panel-up position. The rotation of the tracker rows would be controlled remotely via a wireless local area network. All trackers could be rotated simultaneously in a hazard situation. Fire safety and suppression measures, such as smoke detectors and extinguishers, will be installed and available at the O&M facility. In addition, the operator will implement the following during operations, maintenance, and decommissioning:

- Train all workers to prevent fires and to respond quickly and effectively if an incident occurs.
- Inspect and maintain a fire extinguisher and any other BLM-required fire prevention equipment in each vehicle.
- Prohibit smoking outside of designated smoking areas.
- Perform "hot work" (i.e., welding or working with an open flame or other ignition sources) in controlled areas. Hot work areas will be wetted down as necessary before hot work is performed. At a minimum, a one-hour fire watch will be required after hot work is completed.
- Welding, cutting, grinding, or other flame- or spark- producing operations near the turbines should be minimized and, if required, closely supervised, with fire extinguishing equipment at hand.
- Remote monitoring of all major electrical equipment (transformers and inverters) will be used to screen for unusual operating conditions. Higher than nominal temperatures, for example, can be compared with other operational factors to indicate the potential for overheating which under certain conditions could precipitate a fire. Units could then be shut down or generation curtailed remotely until corrective actions are taken.
- On-site vegetation near all solar arrays, ancillary equipment, and access roads shall be trimmed approximately once every three years, as needed. For the first year, weed management and control would be performed quarterly. For the next two to four years, weed control would be performed annually in compliance with the BLM-approved Integrated Weed Management Plan.
- Schedule maintenance activities outside of the fire season, when possible, to minimize activity during high fire risk days.
- During Red Flag Warning events, as issued daily by the National Weather Service, cease nonessential activities. To mitigate fire risk, weather conditions will be monitored on site and operations and activities will be adjusted based on those conditions. Fire danger potential can be monitored using the following hyperlinked websites:

  CAL FIRE Red Flag Warnings and Fire Weather Watches
  http://www.fire.ca.gov/communications/communications_firesafety_redflagwarning.php

  National Weather Service Fire Weather Hazards
  http://www.nws.noaa.gov/largemap.php

  National 7-day Significant Fire Potential Outlook, California – South Area (Lower Deserts, SC12)
  http://psgeodata.fs.fed.us/7day/action/forecast/8

Southern California Fire Weather Planning Forecast (National Weather Service Zone 261)
http://www.wrh.noaa.gov/firewx/cafw/display_cafwfzone.php?sid=sgx&zone=261

- A Hazardous Materials Management Plan, which establishes standard procedures for reporting, handling, disposal, and cleanup of hazardous material spills and releases, is in place.
- Keep equipment in good working order (i.e., inspect electrical wiring and appliances regularly and keep motors and tools free of dust and grease).
- Ensure that all exit or evacuation routes are free of obstructions.
- Prohibit non-essential heavy equipment operations for road maintenance during Red Flag Warning events.
- Turn off idling vehicles.
- Do not park over dry vegetation and inspect under parked vehicles before moving them to ensure desert tortoises are not present.

5.2. Battery Energy Storage System (BESS)

Battery energy storage systems (BESS) can assist grid operators in more effectively integrating intermittent renewable resources, such as PV solar generation, into the statewide grid. The Project will include an AC-coupled battery or other similar storage system capable of storing up to 650 MW of power for 4 hours. The proposed BESS area (up to 35 acres) would be cleared and graded, as the storage facility must be nearly level. Site preparation activities also would include construction of drainage components to capture and direct stormwater flow around the BESS facility. Once the concrete foundations are in place for the BESS, the batteries, inverters, and other electrical equipment would be mounted and installed. Equipment would be delivered to the site on trucks.

The Project could use any commercially available battery technology, including but not limited to lithium ion, zinc, lead acid, vanadium, sodium sulfur, and sodium or nickel hydride. Battery systems would require air conditioners or heat exchangers and inverters.

The BESS will be designed, constructed, operated, and maintained in accordance with applicable industry best practices, regulatory requirements, and with the current California Fire Code (CFC), which governs the code requirements to minimize the risk of fire and life safety hazards specific to battery energy storage systems used for load shedding, load sharing, and other grid services (Chapter 12, Section 1206, of the 2019 CFC). In accordance with the CFC, the battery enclosure and the site installation design are all required to be signed off by the State Fire Marshal. The battery will be certified and tested to UL 9540A, a test method intended to document the fire characteristics associated with thermal event or fire and would confirm that the system would self-extinguish without active fire-fighting measures. The results of the UL 9540A test would show that any internal fire is contained within the enclosure and not spread to the other parts of the facility. If applicable, the system will use a chemical agent suppressant-based system to detect and suppress fires. If smoke or heat were detected, or if the system were manually triggered, an alarm would sound, horn strobes would flash, and the system would release suppressant, typically FM 200, NOVEC 1230 or similar from pressurized storage cylinders.

The Project owner shall coordinate with the BLM and RCFD to create a training component for emergency first responders to prepare for specialized emergency incidents that may occur at the Project site, including incidents such as fire or explosion at or with the BESS. The Project owner shall also prepare procedures for disconnecting or shutting down the BESS in case of fire or to reduce the chance of fire.

6. WILDFIRE DETECTION AND SUPPRESSION

6.1. Wildland Fire Management Plans and Policies

Federal, state, and local laws, regulations, and policies applicable to the Project are described below. All fire mitigation measures included in the Fire Plan meet the requirements of all federal, state, and local laws, and regulations.

Federal Law, Regulations, and Policies

Federal Wildland Fire Management Policy. On BLM-administered lands in the California Desert, the BLM implements Federal Wildland Fire Management policies and objectives in coordination with state and other federal agencies as part of the California Desert Interagency Fire Management Organization. The Federal Wildland Fire Management Policy was developed by a federal multi-agency group that establishes consistent and coordinated fire management policy across multiple federal jurisdictions. The policy acknowledges the essential role of fire in maintaining natural ecosystems, but also prioritizes firefighter and public safety first in every fire management activity and focuses on risk management as a foundation for all fire management activities. The policy promotes basing responses to wildland fires on approved Fire Management Plans and land management plans, regardless of ignition source or the location of the ignition.

National Electric Safety Code (NESC) and American National Standards Institute (ANSI) Guidelines. A variety of line and tower clearance standards are used throughout the electric transmission industry. Nationally, most transmission line owners follow the NESC rules or ANSI guidelines, or both, when managing vegetation around transmission system equipment. The NESC deals with electric safety rules, including transmission wire clearance standards, whereas the applicable ANSI code deals with the practice of pruning and removal of vegetation.

State Law, Regulations, and Policies

California Fire Plan. The Strategic California Fire Plan was finalized in June 2010 and directs each CAL FIRE Unit to prepare a specific Fire Management Plan. for their areas of responsibility. These documents assess the fire situation within each of CAL FIRE's 21 units and six contract counties. The plans include stake-holder contributions and priorities and identify strategic areas for pre-fire planning and fuel treatment, as defined by the people who live and work with the local fire problem. The plans are required to be updated annually.

Local Law, Regulations, and Policies

Riverside County General Plan. The intent of the Safety Element of the Riverside County General Plan is to reduce death, injuries, property damage, and economic and social impact from hazards. The following policies included in the Safety Element generally relate to the proposed Project with respect to hazards and hazardous materials (County of Riverside, 2019).

- **Policy S 5.1.** Develop and enforce construction and design standards that ensure that proposed development incorporates fire prevention features through the following:
  - All proposed development and construction within Fire Hazard Severity Zones shall be reviewed by the Riverside County Fire and Building and Safety departments.
  - All proposed development and construction shall meet minimum standards for fire safety as defined in the Riverside County Building or County Fire Codes, or by County zoning, or as dictated by the

Building Official or the Transportation Land Management Agency based on building type, design, occupancy, and use.

- In addition to the standards and guidelines of the California Building Code and California Fire Code fire safety provisions, continue to implement additional standards for high-risk, high occupancy, dependent, and essential facilities where appropriate under the Riverside County Fire Code (Ordinance No. 787) Protection Ordinance. These shall include assurance that structural and nonstructural architectural elements of the building will not impede emergency egress for fire safety staffing/ personnel, equipment, and apparatus; nor hinder evacuation from fire, including potential blockage of stairways or fire doors.
- Proposed development and construction in Fire Hazard Severity Zones shall provide secondary public access, in accordance with Riverside County Ordinances.
- Proposed development and construction in Fire Hazard Severity Zones shall use single loaded roads to enhance fuel modification areas, unless otherwise determined by the Riverside County Fire Chief.
- Proposed development and construction in Fire Hazard Severity Zones shall provide a defensible space or fuel modification zones to be located, designed, and constructed that provide adequate defensibility from wildfires.

- **Policy S 5.4.** Limit or prohibit development or activities in areas lacking water and access roads.
- **Policy S 5.6.** Demonstrate that the proposed development can provide fire services that meet the minimum travel times identified in Riverside County Fire Department Fire Protection and EMS Strategic Master Plan.
- **Policy S 7.14.** Regularly review and clarify emergency evacuation plans for dam failure, inundation, fire and hazardous materials releases.
- **Policy S 7.15.** Develop a blueprint for managing evacuation plans, including allocation of buses, designation and protection of disaster routes, and creation of traffic control contingencies.

Desert Center Area Plan. The intent of the Wildland Fire section of the Hazards section of the Desert Center Area Plan (a part of the General Plan) is to address wildland fire susceptibility for improved public safety in the Desert Center area. The following policy included in the Desert Center Area Plan generally relates to the proposed Project with respect to public services and utilities (County of Riverside, 2015).

- **Policy DCAP 10.1.** Protect life and property from wildfire hazards through adherence to the Fire Hazards section of the General Plan Safety Element.

Riverside County Fire Department (RCFD) Technical Policy TP-15-002. The RCFD TP-15-002, titled Solar Energy Generating System (SEGS) Fire Apparatus Access Roads, is a standard that was developed to assist with the design of fire apparatus access roads from public roadways to a SEGS (i.e., solar facility). It addresses secondary access road requirements, which shall be determined by the County Fire Marshal given the specific conditions of any given solar project (Riverside County Fire Department, 2020). Each SEGS project will be reviewed on a case-by-case basis to determine secondary fire apparatus access requirements to facilitate emergency operations and to minimize the possibility of an access point being subject to congestion or obstruction during an emergency incident. This standard states that the secondary access road shall not be less than 20 feet in width and shall have an unobstructed vertical clearance of no less than 13 feet, 6 inches. The grade of the access road shall not exceed 15 percent. The access road shall be designed, constructed, and maintained to support the imposed load of fire apparatus weighing at least 75,000 pounds and constructed to Riverside County Transportation Standards. A registered engineer shall certify the design and construction of the access road based on the fire apparatus-imposed load of 75,000 pounds.

6.2. Detection and Reporting

All fires shall be reported to the BLM and RCFD immediately. Table 1 provides applicable emergency services contact information.

Table 1. Emergency Contacts

Contact	Phone	Procedure
Fire	**911** 951-657-2161 emergency 951-940-6949 for non-emergency	ALL fires (on and within sight of the Project) shall be immediately reported. When reporting an incident, you need the following information: ■ Type of incident (fire, explosion, etc.) ■ Location of incident ■ Time of incident ■ Information on any injury or fatality ■ Name and phone number for callback
Ambulance	**911**	
Federal Interagency Communication Center (BLM)	909-383-5651	
CAL FIRE Fire/Incident Investigations	951-943-4970	
CAL FIRE Arson Hotline	800-468-4408	
Riverside County Emergency Operations Center	951-955-4700	
Riverside County Fire Information	951-940-6985	

6.3. Suppression and Response

If a fire is identified, the following steps shall be implemented:

- If it is safe to do so, extinguish a fire using on-site fire extinguishers and appropriate tools.
- Notify emergency services immediately, even if the fire appears out.
- Initiate emergency procedures, as appropriate, including electrical isolation.
- If an off-site wildfire threatens the facility while personnel are on site, evacuate the site if it is safe to do so, meet at a predetermined location to ensure that all personnel have safely evacuated.

7. EMERGENCY, SAFETY AND WORKER ENVIRONMENTAL AWARENESS PROGRAM

A written emergency response plan (ERP) will be developed in accordance with Occupational Safety and Health Administration (OSHA) standards and other applicable federal, state, and local occupational safety and health laws, regulations, and standards governing such emergencies. Contractor(s) will include the ERP in the contractor's Project Safety Plan (PSP) and train all contractor representatives on the provisions of the ERP.

The safety of personnel is the top priority during the construction, operations, maintenance, and decommissioning of the Project. Required staff training would include fire prevention procedures, environmental, cultural, and health and safety training, in part through the Project's Worker Environmental Awareness Program (WEAP). Annual familiarity training would be conducted with the local authorities, including police, BLM, and RCFD, as appropriate including annual First Aid and CPR training. The construction, operations, and contractor management staff will work to implement safety recommendations and assist in conducting site inspections.

In the event of an emergency response, the individual that discovered the emergency would conduct the following measures:

1. Personnel would assess the situation to determine potential safety concerns and hazards posed to personnel and the environment. Protective actions for life safety are the first priority.
2. All personnel will be moved or evacuated to a safe location. Access to the affected area would be prohibited. (The final ERP will include a site-specific evacuation plan and a shelter-in-place plan.)
3. Stabilization of the incident is the second priority. Anyone who witnesses an unusual situation that cannot be corrected routinely must notify their supervisor immediately and, while respecting the jurisdiction and ability, he/she must take the necessary measures to control the situation until the arrival of the Emergency Coordinator or supervisor.
4. The construction contractor would immediately notify the Project operator's construction supervisor and environmental monitor of any emergencies and Project operator would notify federal, state, and local authorities, as appropriate. If an emergency threatens public or worker health, the contractor would make appropriate notification(s) to emergency personnel by calling 911.

8. REFERENCES

CAL FIRE (California Department of Forestry and Fire Protection). 2020. Fire Hazard Severity Zone (FHSZ) Viewer. [Online]: https://egis.fire.ca.gov/FHSZ/.

_____. 2007. FHSZ GIS Data for California.

County of Riverside. 2019. General Plan, Chapter 6 – Safety Element. [Online]: https://planning.rctlma.org/Portals/14/genplan/2019/elements/Ch06_Safety_080619.pdf.

Riverside County Fire Department. 2020. Technical Policy: SEGS Fire Apparatus Access Roads. [Online]: http://www.rvcfire.org/StationsAndFunctions/AdminSppt/FireMarshal/Documents/Standards/TP15 002 SEGSAccessRoadways 01072020.pdf.

Attachment A

FIRE PLAN TRAINING LOG

Fire Plan Training Log

Appropriate training for all employees and regular site contractors will be implemented annually to ensure all personnel are adequately prepared to reduce fire risk at the facility and are aware of actions to be taken in the event of a fire emergency.

Instructor Only – This training event included the following subject matters (check box beside those that apply):	
☐	Preventing risks of fire
☐	Requirements for informing visitors/contractors of fire risks and ignition control
☐	Functionality of fire protection systems and installations as well as how to handle them
☐	Correct response in case of fire, e.g., reporting processes
☐	Correct use of fire suppression equipment, e.g., fire extinguishers
☐	Understanding of safe evacuation processes

Instructor Name: _____ Signature: _____

Date: _____

Trainee Printed Name	Trainee Signature	Company	Date