

Construction Fire Safety Plan

674 - Ocotillo Express LLC

Ocotillo, CA

For submittal to:
BLM / Imperial County

Prepared by:
Blattner Energy, Inc.

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INTRODUCTION

Blattner Energy Inc. is involved with the erection of wind powered turbine generators in remote and sometimes isolated areas. Consequently a probability that wild and agricultural land fires may be encountered is present. Additionally, fire hazards normally associated with the construction industry can be anticipated.

MANAGEMENT OBJECTIVES

The objective of this Construction Fire Safety Plan is to eliminate the causes of fire, prevent loss of life and property by fire, and to comply with the Occupational Safety and Health Administration's (OSHA) standard on fire prevention, 29 CFR 1926.24. Additionally, it provides employees and the public with information and guidelines that will assist them in recognizing, reporting, and controlling fire hazards during construction.

RISK IDENTIFICATION AND ASSESSMENT

The identification and assessment of fire hazards is outlined below and Blattner Energy Inc.'s separate Emergency Action Plan spell out the procedures for responding to fires. This Fire Prevention Plan serves to reduce the risk of fires at Blattner Energy Inc.'s Ocotillo Express Wind Farm Project in the following ways:

- A. identifies materials that are potential fire hazards and their proper handling and storage procedures;
- B. distinguishes potential ignition sources and the proper control procedures of those materials;
- C. describes fire protection equipment and/or systems used to control fire hazards;
- D. identifies persons responsible for maintaining the equipment and systems installed to prevent or control ignition of fires;
- E. identifies persons responsible for the control and accumulation of flammable or combustible material;
- F. describes good housekeeping procedures necessary to insure the control of accumulated flammable and combustible waste material and residues to avoid a fire emergency; and
- G. provides training to employees with regard to fire hazards to which they may be exposed.

ASSIGNMENT OF RESPONSIBILITY

Fire safety is everyone's responsibility. All employees should know how to prevent and respond to fires, and are responsible for adhering to company policy regarding fire emergencies.

A. Management

Management determines Blattner Energy Inc. fire prevention and protection policies based on Federal, and applicable state and local laws related to fires. Management will provide adequate controls to provide a safe workplace, and will provide adequate resources and training to its employees to encourage fire prevention and the safest possible response in the event of a fire emergency. In responding to fire emergencies, employees shall not fight fires beyond the incipient stage. Management is responsible and will ensure that the engineering, procurement, and construction contract(s) for the proposed project shall clearly state the requirements of all personnel who will work on the site as presented in Fire Safety Plan. Selected contractors who sign the agreement are responsible for carrying out these provisions.

B. Plan Administrator

The Site Safety Coordinator shall manage the Fire Prevention Plan for Blattner Energy Inc. and shall maintain all records pertaining to the plan. The Plan Administrator shall also:

1. Develop and administer the Blattner Energy Inc. fire prevention training program.
2. Ensure that fire control equipment and systems are properly maintained.
3. Control fuel source hazards.
4. Conduct fire risk surveys (see Appendix A) and make recommendations.
5. Site Safety Coordinator shall be responsible for posting fire rules on the project bulletin board at the contractor's field office and areas visible to employees.
6. Fires ignited onsite shall be **immediately** reported to BLM FIRE and the Imperial County Fire Department.

C. Supervisors

Supervisors are responsible for ensuring that employees receive appropriate fire safety training, and for notifying the Site Safety Coordinator when changes in operation increase the risk of fire. Supervisors are also responsible for enforcing Blattner Energy Inc. fire prevention and protection policies.

D. Employees

All employees shall:

1. Complete all required training before working without supervision.
2. Conduct operations safely to limit the risk of fire.
3. Report potential fire hazards to their supervisors.
4. Follow fire emergency procedures.

RISK CONTROL**A. Good Housekeeping**

To limit the risk of fires, employees shall take the following precautions:

1. No Smoking except in designated safe smoking areas which include cleared area with no combustible vegetation or materials and approved butt receptacles.
2. Minimize the storage of combustible materials.
3. Make sure that all exit or evacuation routes are kept free of obstructions.
4. Dispose of combustible waste in accordance with all applicable laws and regulations.
5. Use and store flammable materials in areas away from ignition sources.
6. Keep incompatible (i.e., chemically reactive) substances away from each other.
7. Perform "hot work" (i.e., welding or working with an open flame or other ignition sources) in controlled areas. Hot work permits are required for all hot work.
7. Keep equipment in good working order (i.e., inspect electrical wiring and appliances regularly and keep motors and tools free of dust and grease.
8. Ensure that heating units are safeguarded.

9. Report all fuel or petroleum leaks immediately. The Site Mechanic shall ensure that all leaks are repaired immediately upon notification.
10. Repair and clean up flammable liquid leaks immediately.
11. Keep work areas free of combustible materials.
12. Do not rely on extension cords if wiring improvements are needed, and take care not to overload circuits with multiple pieces of equipment.
13. Turn off electrical equipment when not in use.

B. Maintenance

The Site Mechanic will ensure that equipment is maintained according to manufacturers' specifications. Blattner Energy Inc. will also comply with requirements of the National Fire Protection Association (NFPA) codes for specific equipment. Only properly trained individuals shall perform maintenance work.

The following equipment is subject to the maintenance, inspection, and testing procedures:

1. portable fire extinguishers;
2. fire alarm systems;
3. water trucks and associated equipment; and
4. emergency backup systems and the equipment they support.

TYPE OF RISK

The following sections address the major workplace fire risks at Blattner Energy Inc. jobsites and the procedures for controlling those risks.

A. Electrical Fire Hazards

Electrical system failures and the misuse of electrical equipment are leading causes of workplace fires. Fires can result from loose ground connections, wiring with frayed insulation, or overloaded fuses, circuits, motors, or outlets.

To prevent electrical fires, employees shall:

1. Make sure that worn wires are replaced.
2. Use only appropriately rated fuses.
3. Never use extension cords as substitutes for wiring improvements.
4. Use only approved extension cords [i.e., those with the Underwriters Laboratory (UL) or Factory Mutual (FM) label].
5. Check cords and equipment in hazardous locations where the risk of fire is especially high.
6. Check electrical equipment to ensure that it is either properly grounded or double insulated.

B. Portable Heaters

All portable heaters shall be approved by the Site Mechanic. Portable electric heaters shall have tip-over protection that automatically shuts off the unit when it is tipped over. There shall be adequate clearance between the heater and combustible furnishings or other materials at all times. Portable electric heaters must be plugged directly into an electrical outlet. Portable heaters may not be powered with an extension cord.

C. Office Fire Hazards

Fire risks are not limited to Blattner Energy Inc. jobsites. Fires in offices have become more likely because of the increased use of electrical equipment, such as computers and fax machines. To prevent office fires, employees shall:

1. Avoid overloading circuits with office equipment.
2. Turn off nonessential electrical equipment at the end of each workday.
3. Keep storage areas clear of rubbish.
4. Ensure that extension cords are not placed under carpets.
5. Ensure that trash and paper set aside for recycling is not allowed to accumulate.
6. Equipment that indicates that it is beginning to malfunction, such as a noisy cooling fan on a computer or similar on copy machines and other office equipment, will result in replacement of the equipment in a timely fashion

D. Cutting, Welding, and Open Flame Work

Supervisors will ensure the following:

1. A jobsite evaluation for fire hazards is completed prior to work beginning.
2. A Hot Work Permit is obtained and all requirements of the permit are observed.
3. Cutting and welding are done by authorized personnel in designated cutting and welding areas whenever possible.
4. Torches, regulators, pressure-reducing valves, and manifolds are UL listed or FM approved.
5. Oxygen-fuel gas systems are equipped with listed and/or approved backflow valves and pressure-relief devices.
6. Cutters, welders, and helpers are wearing eye protection and protective clothing as appropriate.
7. Cutting or welding is prohibited in areas where explosive atmospheres of gases, vapors, or dusts could develop from residues.
8. Small tanks, piping, or containers that cannot be entered are cleaned, purged, and tested before cutting or welding on them begins.
9. Fire watch has been established.

E. Flammable and Combustible Materials

The Site Safety Coordinator shall regularly evaluate the presence of combustible materials at all jobsite locations.

Certain types of substances can ignite at relatively low temperatures or pose a risk of explosion if ignited. Such substances obviously require special care and handling.

1. Class A combustibles.

These include common combustible materials (wood, paper, cloth, rubber, vegetation and plastics) that can act as fuel and are found in non-specialized areas such as offices.

To handle Class A combustibles safely:

- a. Dispose of waste daily.
- b. Keep trash in metal-lined receptacles with tight-fitting covers (metal wastebaskets that are emptied every day do not need to be covered).
- c. Keep work areas clean and free of fuel paths that could allow a fire to spread.
- d. Keep combustibles away from accidental ignition sources, such as hot plates, soldering irons, or other heat- or spark-producing devices.
- e. Store paper stock in metal cabinets.
- f. Store rags in metal bins with self-closing lids.
- g. Do not order excessive amounts of combustibles.
- h. Make frequent inspections to anticipate fires before they start.

Water, multi-purpose dry chemical (ABC), and halon 1211 are approved fire extinguishing agents for Class A combustibles.

2. Class B combustibles.

These include flammable and combustible liquids (oils, greases, tars, oil-based paints, and lacquers), flammable gases, and flammable aerosols.

To handle Class B combustibles safely:

- Use only approved pumps, taking suction from the top, to dispense liquids from tanks, drums, barrels, or similar containers (or use approved self-closing valves or faucets).
- Do not dispense Class B flammable liquids into containers unless the nozzle and container are electrically interconnected by contact or by a bonding wire. Either the tank or container must be grounded.
- Store, handle, and use Class B combustibles only in approved locations where vapors are prevented from reaching ignition sources such as heating or electric equipment, open flames, or mechanical or electric sparks.
- Do not use a flammable liquid as a cleaning agent inside a building or tool van (the only exception is in a closed machine approved for cleaning with flammable liquids).
- Do not use, handle, or store Class B combustibles near areas normally used as exits.
- Do not weld, cut, grind, or use unsafe electrical appliances or equipment near Class B combustibles.

- Water should not be used to extinguish Class B fires caused by flammable liquids. Water can cause the burning liquid to spread, making the fire worse. To extinguish a fire caused by flammable liquids, exclude air around the burning liquid. The following fire-extinguishing agents are approved for Class B combustibles: carbon dioxide, multi-purpose dry chemical (ABC), Halon 1301, and Halon 1211.
- Do not generate heat, allow an open flame, or smoke near Class B combustibles.

F. Fuel Storage Refueling Area

Class B fuel storage shall be maintained per NFPA requirements and provide the following life safety appliances:

1. Each tank shall be grounded.
2. Secondary containment shall be designed and installed to accommodate the capacity of the largest tank contained within.
3. At least four 30 lbs. Class BC dry chemical fire extinguishers shall be maintained within immediate access to storage/refueling area.
4. No smoking signs shall be posted on each tank and smoking prohibited within 20 ft. of the storage/refueling area.
5. NFPA/DOT placards designating the hazard and product contained within shall be posted on each tank.
6. All engines shall be shut off during refueling operations.
7. No portable electrical generators shall be operated with the storage area.

G. Desert Brush, Grass and Wild Lands

The wind farm jobsite contains desert brush, grass and wild lands. Strong efforts on the part of everyone must be taken to prevent fire within these areas. All supervisors and employees are to ensure that:

1. All company pickup trucks shall be equipped with a first-aid kit, fire extinguisher, and shovel;
2. All internal combustion engines used at the project site shall be equipped with spark arresters. Spark arresters shall be in good working order
3. All machinery with an internal combustion engine are equipped with a fire extinguisher; as it reads now, handheld, power equipment with engines would be required to include a fire extinguisher
4. All vehicles equipped with catalytic converters are not parked or operated in desert brush, grass or wild lands unless on a designated roadway.
5. When it is necessary to cross with or operate equipment on desert brush, grass or wild lands the travel route or place of operation shall be wetted down with a water truck, or otherwise rendered inert.
6. No hot work is to be performed upon or immediately adjacent to desert brush, grass or wild lands unless specifically approved by the Site Manager and all precautions have been taken to insure the work zone has been rendered inert.
7. Mufflers and catalytic converters on all vehicles will be maintained in good working order
8. Equipment parking areas and small stationary engine sites (eg., generators) shall be cleared of all extraneous flammable materials.

9. The Applicant shall make an effort to restrict use of chainsaws, chippers, vegetation masticators, grinders, drill rigs, tractors, torches, and explosives to outside of the official fire season. When the above tools are used, water tanks equipped with hoses, fire rakes, and axes shall easily accessible to personnel.

H. Smoking

Smoking is prohibited on all Blattner Energy Inc. jobsites unless within an enclosed vehicle. With approval of the Site Manager certain outdoor areas may be designated as smoking areas.

I. Red Flag, and Special Conditions

Upon issue of a Red Flag Warning by the San Diego weather office of the National Weather Service all job site work shall cease until such time as the warning has been lifted, or governmental authority has been granted to resume activities. In order to ensure compliance with this part a NWS Weather Radio will be monitored on site at all times, additionally the Site Safety Coordinator will monitor local fire emergency channels. Winds shall be monitored and wind events may occur that do not meet the thresholds of a Red Flag Alert or Red Flag Warning. Fire coordinators shall determine when weather risks preclude Hot Work. The project is financially liable for fire suppression costs including the costs of Command and support personnel, Fire Engines, Dozers, Hand Crews, Firefighting Helicopters, Firefighting Air Tankers, Mutual Aid resources and fire investigations. Red Flag Warnings, as issued by the National Weather Service for the Fire Weather Zone encompassing the project shall trigger restricted activities. Red Flag Warnings are indicated on NWS site: <http://www.wrh.noaa.gov/firewx/cafw/index.php> which shall be monitored, especially during warm, dry conditions. Upon announcement of Red Flag Warning, red flags will be prominently displayed at the entrance gate and main office indicating to employees and contractors that restrictions are in place.

VALUES TO BE PROTECTED

In the event of a wildfire, life safety, environmental, project production and infrastructure values would be affected. Additionally, the production use and economic value of industrial, farm and pastureland would be severely impacted. Recreational use of these and adjacent lands would be also affected. The loss of vegetation may result in unnecessary storm water runoff, silting of waterways and other related environmental and wildlife concerns.

PROTECTION CAPABILITY

Protection capability and response times are limited to the following factors:

1. The project will be equipped with three water trucks each of 4000 gallon capacity. Each truck will be equipped with 50 feet of 1 /4" fast response hose w/fog nozzles. Any hose size greater than 1 1/2" shall use National Hose (NH) couplings.
2. Additionally, each company pickup truck is equipped with first-aid kits, fire extinguishers and shovels.
3. Estimated response time to a fire emergency would be 3 minutes minimum and 5 minutes maximum.
4. A temporary water storage pond with an approximate storage capacity of 200,000 gallons shall be

maintained onsite during construction and will be made available for firefighting purposes. At least one water drafting site shall be provided with a Fire Authority-approved fire truck access to within 10 feet of an approved hydrant connection enabling a fire engine to draft water from the pond. Similar to swimming pool drafting systems, the pond should have a fire department connection (such as a hydrant) on the drain line system, located in an accessible location for fire engines, and labeled “fire drafting hydrant; (#____) gallons”, or similar. The objective of the pond drafting connection is that a fire engine can access the water for firefighting, if no other water source is available or as a supplement in a worst case condition. In addition, it is advised that a minimum of one UL listed or FM approved fire pump is maintained on the site as a means of accessing the hydrant water should the connection be inaccessible or inoperable or additional water is needed. Any fire pump shall be approved for fire service. The pump and its storage area and maintenance shall be to approval of the Fire Marshal.

5. To facilitate the arrival of fire services during construction, an emergency response meeting point has been established with the Imperial County Fire Department. The emergency response manager or designated alternative will meet the emergency response team at the meeting point to lead them into the site. The meeting point was decided in conjunction with the Imperial County Fire Department and a map has been furnished to the Fire Department. See Exhibit A.
6. Blattner personnel are not trained firefighters and are not to fight fires beyond the incipient or initial stages. Personnel have been trained to summon professional help and evacuate to designated zones of safety.
7. Personnel have not been equipped with or trained in the use of professional firefighting equipment.
8. Requirements listed in **Exhibit B**.
9. At least one operational water truck will be on site during all working hours.
10. During hot work operations, a fire watch equipped with a fire extinguisher will be in position whose sole job will be to watch for fire during hot work operations. The fire watch shall maintain watch for 1 hour after hot work stops.

IMPLEMENTATION OF PLAN

In the event of any fire incident the 911 Emergency System will be activated and professional assistance summoned. The Fire Agencies have statutory responsibilities to track ignition trends in the jurisdictions and develop mitigations to reduce said ignitions. Notification of the public will be through the 911 Emergency Center through channels outlined in the National Modular Incident Command System.

Reporting Emergencies:

In the event of fire, storm, flood, serious injury or other emergency, the following personnel can be contacted:

Designated Fire/Emergency Responders:

Fire, Ambulance and all other emergencies will be coordinated through the Emergency Center listed below:Imperial County Sheriff	(760) 394-4114
California Highway Patrol	(760) 482-2500
Imperial County Fire Service	(760) 355-1191
EMS Ambulance	TBD
Cal OSHA	(559) 445-5302 or (818) 901-5403
BLM Fire; Federal Interagency Communications Center	909-383-5651

WILDFIRE SUPPRESSION

Should the need arise requiring the protection of personnel and property from wild land fires the following guidelines should be used:

1. No employee shall fight a fire beyond the incipient stage and the arrival of professional fire suppression personnel, further fire suppression efforts upon the part of the employee shall be voluntary and under the request and direction of the BLM Incident Commander.
2. Prior to the start of suppression efforts an incident management system shall be established as outlined in the Crisis Management Plan. Leaders and roles shall be defined.
3. The establishment of fire lines and water suppression shall be confined to open grassland or sparsely vegetated areas.
4. The ideal fire line is to widen existing roads and wet down vegetation well in advance of the fire.
5. The object of fire lines shall be to protect project property, personnel and containment of the fire.
6. SHALL NOT: Qualified Fire Equipment Operators ONLY. Several operators are killed in wildland firefighting operations. Operators must be trained, equipped with firefighting personal protective Equipment, Including fire shelters and equipment cab fire protective curtains. Direct attack by trained operators is the safest strategy. Unintended resource damage can be done with equipment, archaeological and environmental resources can survive fire effects.
7. When establishing wet fire lines ahead of fires sufficient distance from the fire shall be maintained as to prevent being overrun by the fire. Blattner Energy personnel will not operate heavy equipment to create fire breaks or widen roadways; only appropriate emergency response personnel will make the decision to provide and implement strategic fire breaks.

8. Water trucks should be used to render an area inert (too wet to burn) ahead of the fire or around structures. The control of spot fires created by blowing embers would be another good use for water suppression provided safe distance is maintained from the advancing fire by fire trained and qualified individuals.
9. Prior to using water trucks or equipment to establish fire lines an anchor point and multiple escape routes shall be established.
8. Ground personnel shall not approach closer than 200 feet of any advancing fire.
9. Ground suppression shall be limited to groups no smaller than 5 personnel.
10. Prior to any ground approach to an advancing fire clear and definite escape routes shall be established and maintained for quick evacuation of the area if necessary.
11. Direct communications shall be maintained between all equipment operators, truck drivers, ground personnel and the incident command center, liaison personnel equipped with radios shall be assigned.
12. At no time are creosote thickets or heavily vegetated areas to be entered by ground personnel or operating equipment during a wild land fire.

EVACUATION

Escape and Evacuation Procedures:

Depending on the degree of the emergency, the emergency alarm and, if safe to do so, employees will evacuate to the designated assembly area, where the designated Supervisor(s)-Wardens shall account for all employees and determine if anyone still remains within the emergency scene. The Primary Designated Assembly Area is designated as the lay down area adjacent to the main job-site trailer located at **TBD, Ocotillo, California**.

Should a wild land fire occur, other locations may be designated as secondary assembly areas. Senior decision makers should plan on being available and with the Incident Commander through the Incident to facilitate information exchange.(CRH)

Routes for Evacuation:

Dependent upon the degree of emergency, weather and/or localized site conditions roadways as designated on the site map will be used for routes of evacuation. Terrain features favorable to swift evacuation may be utilized in the event of a fast moving wildfire. String roads will exit onto paved or graded public roadways and will be followed to the above designated assembly area.

The following personnel are designated as evacuation wardens, they will ensure should an evacuation be necessary that all job sites are clear and all personnel are accounted for, foreman level supervisors shall

assist wardens in accounting for personnel. Individuals shall be assigned to meet and guide firefighting resources to the scene.

TRAINING

Site Safety Coordinator and or Field Engineers shall present basic fire prevention training to all employees upon employment, and shall maintain documentation of the training, which includes:

1. 43 CFR 9212.1,2, 43 CFR 8343.1 (C) (BLM).
2. Review of 29 CFR 1926.24, including how it can be accessed;
3. Fire Management: Wildfire Prevention (43 C.F.R. 9212.0 et seq.);
4. This Fire Prevention Plan, including how it can be accessed;
5. Good housekeeping practices;
6. Proper response and notification in the event of a fire;
7. Instruction on the use of portable fire extinguishers (as determined by company policy in the Emergency Action Plan); and recognition of potential fire hazards.

Supervisors shall train employees about the fire hazards associated with the specific materials and processes to which they are exposed, and will maintain documentation of the training. Employees will receive this training:

1. At their initial assignment;
2. Annually; and
3. When changes in work processes necessitate additional training.

PROGRAM REVIEW

The Site Safety Coordinator shall review this Fire Prevention Plan at least annually for necessary changes.

APPENDIX A

Fire Risk Survey
BLATTNER ENERGY INC.
674 - Ocotillo Express

Type of Fire Hazard	Location	Emergency Actions	Notify
Crop Fire			
Grass/Vegetation Fire			
Electrical Fire			
Petroleum Fire			
Combustibles Fire			
Desert Scrub			

Completed by: _____

Date: _____

APPENDIX B

EXHIBIT A - SITE MAP

CONFIDENTIAL

EXHIBIT B - REQUIREMENTS**BLM Fire Management: California Desert District; Palm Springs-South Coast-El Centro Zone**

In brief, the California Desert District Fire Management program operates under coordination by the District (CDD), a decentralized fire program based on the Fire Management Zone concept. The Palm Springs-South Coast Field Office and El Centro Field Offices and the Santa Rosa and San Jacinto Mountains National Monument are the political sub-divisions served by this Zone. The Palm Springs and El Centro areas are provided fire protection by BLM Fire on Federal Responsibility Areas. The South Coast Area is provided fire suppression services by CAL FIRE in San Diego, Riverside, and San Bernardino Counties south of the San Bernardino National Forest. And the Los Angeles County Fire Department in that area. These South Coast Area fire agencies provide their services under a Direct Protection Agreement for BLM. The South Coast Area is divided along north and south axis at the southern Riverside county line with San Diego and Imperial Counties. Two Fire Mitigation Education Specialists are based in respective geographical areas and provide the BLM Fire Agency Representative roles in those areas. The Division Chief/ Fire Management Officer and Fuels Management are located in Palm Springs, CA. Suppression resources include two of the ten BLM/Park Service Engines of the CDD. Additional resources available to BLM are the closest appropriate to the task local, state and federal engines, crews, bulldozers, and firefighting aircraft.

A. Fire Management: Wildfire Prevention (43 C.F.R. 9212.0 et seq.)

These regulations outline procedures to be used to prevent wildfires on BLM lands. BLM policy requires the agency to take all necessary actions to protect human life, the public lands, and the resources and improvements on the public lands through the prevention of wildfires. Whenever possible, BLM actions should complement and support local wildfire prevention actions. *Authority: 43 U.S.C. 1701 et seq.*

The BLM Fire in cooperation with local, state and federal laws require the following

Roles and Responsibilities:

BLM Fire is responsible for Fire Suppression, Fire Mitigation, Fire Prevention, Fire Education and receptive fuels of wildland fires on BLM Lands. BLM Fire will operate in collaboration with local fire agencies in design, prevention and suppression operations.

Delegation of Authority:

The BLM shall designate the appropriate Fire Department, by jurisdiction, on a project by project basis, to work with BLM Fire in assistance with wildland fires, structural, vehicle, chemical and energized electrical firefighting. Emergency Medical Services, Technical Rescue, and Hazardous Materials.

BLM Fire will support this delegation of Authority in Unified Command or through Fire Management Agency Representatives to facilitate the call and management of appropriate BLM specialists to assist in emergency incidents on BLM Lands. (Example: Hazardous Materials Incident).

Lack of Fire Services:

If the local jurisdiction is unable to accept this project, BLM Fire and the local agency will determine and specify the requirements of an Industrial Fire Brigade as stipulated for 24 hour service.

Fences: As necessary, shall not limit access to fire roads, fire hydrants, or fire protection systems, such limitations shall be mitigated with gates to allow immediate access. (For example a fence blocking access to a water tank or hydrant).

Gates: Shall be no less width than 12 feet, to facilitate the use of firefighting bulldozers.

House Keeping: No combustible materials, patio furniture, wood picnic tables, sun shades, patio roof shall be stored placed or constructed around buildings. Such items must be fire resistant.

Campfires, Barbeques, stoves: Must be placed in cleared areas.

Locks: Provide a Knox Box or similar to allow fire and law enforcement, including US Border Patrol access.

Fire Plan/Notification List: Shall be updated as changes occur, and available on scene at the Knox Box location.

Addresses: Shall be at least 6 inches in height and of color contrast to its background.

Below surface pipelines, electrical and communications lines: Shall be signed at an interval appropriate to alert firefighting bulldozer and off road fire engine operations to advise firefighters of depth and location. Project contains extensive amount of underground electrical lines running primary along access roads and adjacent to turbines at an average depth of four feet. Appropriate signage to be reviewed with the BLM prior to installing.

Tower Pads: Shall be of gravel to facilitate all weather parking by firefighting vehicles. Gravel to be placed in sequence with construction activities.

Fire Mitigation funds: to a Fire Management Code, are necessary to mitigate employee costs and lead to acquisition of 2 additional Fire Prevention technicians and Patrol trucks over the service life of the projects to reduce wildfire risks and educate communities to FireSafe/ FireWise concepts. To be arranged by Ocotillo Express, LLC.