

Construction Fire Prevention Plan

Round Mountain 500 kilovolt (kV) Area Dynamic Reactive Support Project Fern Road Substation

June 2023

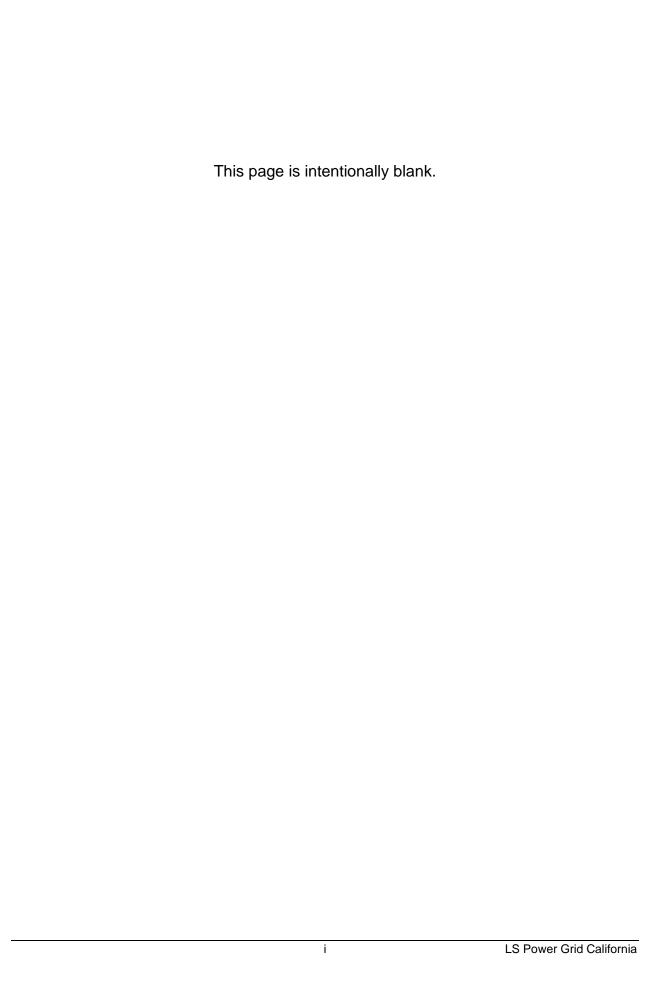


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1. PROJECT DESCRIPTION

1.1 Location

Construction of the Fern Road Substation (the "Project"), a component of the Round Mountain 500 kilovolt (kV) Area Dynamic Reactive Support Project, will provide critical reliability and voltage support for the existing regional transmission system. The Project site is approximately 13 acres of land, located east of Fern Road and east of the existing Pacific Gas and Electric (PG&E) transmission right-of-way in Shasta County, California.

The Project site is located approximately 1.6 miles northwest of the unincorporated community of Whitmore and approximately 9.3 miles north of State Highway 44. The Project site is located within the east half of Public Land Survey System (PLSS) Section 11 of Township 32 North and Range 1 West, Mt. Diablo Meridian.

The Project will facilitate system stability and reliability through the construction of a dynamic reactive power support substation providing approximately +/-529 million volt-amperes, reactive (MVAR) dynamic reactive capability to include a minimum of two equally sized Static Synchronous Compensator (STATCOM) units. The STATCOM units would be located within the new Fern Road Substation and would be independently connected to the existing PG&E's regional electric transmission system via the Round Mountain – Table Mountain #1 and #2 500 kV transmission lines that are located west of the Fern Road Substation site.

The primary components of the Project will include:

- The new Fern Road Substation consisting of two approximately 4,000 square-foot STATCOM enclosures, three 500 kV voltage transformers, and various 97.5 kV and 500 kV gas-insulated switchgear;
- Supervisory Control and Data Acquisition (SCADA) system that will consist of fully redundant servers, power supplies, and Ethernet Local Area Network (LAN) and Wide Area Network (WAN) connections, routers, firewalls, and switches;
- 3. Stormwater management system that will comprise the installation of Best Management Practices (BMPs) such as silt fencing and fiber rolls, with potential runoff being managed by a stormwater detention basin;
- Chain link and barbed wire security fencing approximately nine feet in height with secure gates accessible only by LS Power Grid California (LSPGC) staff, PG&E and emergency services personnel;
- 5. An existing 700-foot long, 15-foot wide, private dirt road that will be extended by an additional approximate 1,000 feet and widened to approximately 20 feet, that will be graded and rocked for a total of 1,700 feet to accommodate access to the temporary staging yard, deliveries, and worker access for construction and operations and maintenance (O&M);
- 6. Development of one new permanent substation access road, constructed with gravel or rock, which will provide internal access within the Fern Road Substation facility during construction and O&M; and
- 7. PG&E transmission line reconfiguration to connect to bays located on the north and west sides of the Fern Road Substation, as well as modifications that would require the removal of existing structures and construction of new structures to accommodate the integration

of the transmission lines into the Fern Road Substation and the overall regional transmission system.

1.2 Project Timeframes

This Project's construction phase will be approximately 22 months. All components of the Project will be installed during a single phase of construction.

Work activities that are anticipated to take place may include, but are not limited to:

- Grading for road maintenance, site/pad contouring, and structure foundations.
- Hazard reduction; mowers and weed eaters.
- Excavation for new foundation steel pole/tower placement.
- Digging and setting direct-bury new steel structures.
- Erection of new structures.
- Micro-pile foundations.
- Operation of generators, compressors, and other internal combustion engines.
- Operation of backhoes, augers, and other rock striking equipment.
- Welding, grinding, and cutting of steel.
- Working in and around energized lines.
- Conductor stringing.
- Cable pull operations.
- Trenching.
- Surveys and inspections.
- Environmental monitoring and surveys.

2. FIRE PREVENTION PLAN AND INTRODUCTION

This Construction Fire Prevention Plan (CFPP or Fire Plan) has been prepared in compliance with applicant proposed measure (APM) FIRE-1 in the Initial Study/Mitigated Negative Declaration (IS/MND) issued by the California Public Utilities Commission (CPUC) for the Project. The objective of the CFPP is to provide the LSPGC Project team, including its contractors, with a set of measures that will be implemented in order to minimize and prevent fire-related hazards that could occur, and provide procedures to assist in the prevention and response to a fire in a manner that will protect workers and the general public during the construction phase of the Project. The CFPP discusses the potential for a wildfire ignition in the Project area and outlines the appropriate BMPs, as well as requirements in the applicable APMs to minimize the potential for fire as it relates to Project construction activities; this includes emergency response, fire prevention, use of fire tools and equipment, and roles and responsibilities of Project personnel. The full text of the APMs applicable to this Fire Plan are provided below in **Section 4: Project Fire Risks and Mitigation Measures**.

As defined by California Department of Forestry and Fire Protection (CAL FIRE), the Project site is located within a State Responsibility Area (SRA) (see Figure 1: Fire Hazard Severity Zones).

CAL FIRE has adopted Fire Hazard Severity Zone (FHSZ) mapping for SRAs throughout the state (CAL FIRE, 2020a). These maps identify wildfire hazard zones and rate them as "moderate," "high," or "very high" based on fuel loading, slope, fire weather, and other relevant factors. The Project area is primarily within a High and Very High FHSZ.

The CPUC mapped high fire threat areas where more stringent requirements will be implemented due to the elevated risk for power line fires. The area surrounding the Project has been classified as a Tier 2 High Fire Threat District (HFTD) (CPUC, 2019a). HFTDs are high fire threat areas defined in CPUC General Order (GO) 95: Rules of Overhead Electric Line Construction (CPUC, 2019b). Tier 2 consists of regions where there is an elevated risk from wildfires associated with overhead utility power lines or overhead utility power-line facilities also supporting communication facilities. The CPUC's Fire Threat Map incorporates fire threat data from the United States Forest Service (USFS) and CAL FIRE which analyze factors such as fuel, weather, and topography (see Figure 2: CPUC Fire Threat Districts).

3. CONSTRUCTION FIRE PREVENTION PLAN DEFINITIONS

The definitions provided below are intended to provide personnel using this CFPP with familiarity regarding relevant terms used by LSPGC personnel, as well as state and local fire response agencies. These definitions provide important information for implementation of the Fire Plan and successful communication and coordination between Project personnel, the CPUC, the applicable Fire Protection Agencies, and the public.

- **Fire Patrol:** Fire patrol(s) are personnel who are assigned the responsibility and are accountable for fire prevention, risk management, early detection of fires, and rapid extinguishment (the assigned Fire Patrol is documented daily).
 - A "designated" Fire Patrol is a member of a work crew assigned responsibility and accountability for fire prevention, risk mitigation, early detection of fires, and rapid extinguishment should a fire occur. This can be accomplished co-laterally with other work duties, but the designated Fire Patrol must be ready to respond to a fire with appropriate fire equipment at all times during construction.
 - A "dedicated" Fire Patrol is a person(s) whose sole responsibility are the duties associated with fire prevention and fire safety. The Fire Patrol will be assigned responsibility and accountability for fire prevention, risk mitigation, early detection of fires, and rapid extinguishment should a fire occur. Dedicated Fire Patrols are typically assigned to a fire engine or water tender, but this equipment is not required.
- Fire Tools: References to "fire tools" pertains to firefighting tools which include items such
 as a shovel, Pulaski, and a five-gallon backpack pump. These tools are commonly
 required on Project vehicles and work sites. Other tool requirements may be identified
 depending on the construction activity being performed, the location, and/or current
 conditions.
- Fire Hazard Severity Zones (FHSV): California law requires CAL FIRE to identify areas
 based on the severity of fire hazard that is expected to prevail there. These areas, or
 "zones," are based on factors such as slope, fire history, existing and potential fuel (natural
 vegetation), predicted flame length, blowing embers, terrain, and typical fire weather for
 the area. There are three zones, based on increasing fire hazard: medium, high, and very
 high.

- High Fire Threat District (HFTD): The CPUC created the HFTD Map to identify areas of increased risk for utility associated wildfires. High fire-threat areas defined in CPUC General Order 95: Rules for Overhead Electric Line Construction consist of the following three tiers:
 - Tier 1 consists of High Hazard Zones (HHZs) on the map of Tree Mortality HHZs prepared jointly by CAL FIRE. Tier 1 HHZs are in direct proximity to communities, roads, and utility lines, and represent a direct threat to public safety.
 - Tier 2 consists of areas on the CPUC's Fire-Threat Map where there is an elevated risk for destructive utility-associated wildfires. The CPUC Fire-Threat Map was approved by the CPUC on January 19, 2018.
 - Tier 3 consists of areas on the CPUC Fire-Threat Map where there is an extreme risk for destructive utility-associated wildfires.
- At Risk Activity: Project activities that present a risk of igniting a wildfire.
- **Emergency Work:** Work required to resolve situations that present immediate threats to human life or property regardless of ownership (36 CFR 251.50b).
- Red Flag Warning (RFW): A RFW is issued for a stated period of time by the National Weather Service (NWS) using pre-determined criteria to identify critical fire danger in a particular geographic area. The RFW is the highest level of alert issued by the NWS.
- **Fire Box:** A Fire Box can be placed in a staging area (i.e., Major Operations Work Area) or worksite to supplement available fire suppression equipment (i.e., fire tools) when necessary due to excessive work activity. The specific fire tools required are based on the specific activity and the fire risk. It generally contains additional hand tools and/or backpack pumps as deemed appropriate.
- **CFPP:** Commonly referred to as the Fire Plan. The Fire Plan is developed and implemented by LSPGC to provide fire prevention guidance for a specific construction project.
- **Project:** "Project" may be used interchangeably in place of Round Mountain 500 kV Area Dynamic Reactive Support Project or Fern Road Substation in the CFPP.
- **Hot Work:** Metal cutting, welding, grinding, or activities that require open flame and/or have a high probability of producing sparks. These activities may have different requirements depending on land ownership or the fire agency having jurisdiction.
- Owner's Representative: A LSPGC employee who serves as liaison to the fire agencies and other emergency services. The Owner's Representative will help the emergency service agencies obtain their needs related to the utility and represent the utility needs to the emergency service agencies. The Owner's Representative also serves as the LSPGC point-of-contact (POC) with construction personnel and the Project management team. This employee is responsible for overseeing that construction work is performed in compliance with Project requirements.
- Wildland Areas: This is any area with wildland vegetation (trees, grass, and ground litter)
 to support the ignition and spread of a wildland fire. This does not include parking strips,
 ornamental vegetation or areas that are cultivated, landscaped, and irrigated.
- **Wildland Fuels:** Native vegetation such as grasses, brush, and trees that are not cultivated, planted as landscaping, or irrigated.

4. PROJECT FIRE RISKS AND MITIGATION MEASURES

This CFPP, or Fire Plan, has been prepared in compliance with APMs FIRE-1, FIRE-2, FIRE-3, FIRE-4, FIRE-5 and HAZ-4 in the IS/MND issued by the CPUC for the Project. This Fire Plan will take precedence over any other fire plans prepared by LSPGC or its contractors for the Project, and all LSPGC personnel and its subcontractors will be required to follow the requirements of this Fire Plan.

APM FIRE-1: The CFPP shall include the purpose and applicability of the Plan, responsibilities and duties, preparedness training and drills. Procedures for fire reporting, response, and prevention will also be detailed and include identification of daily site-specific risk conditions, the tools and equipment needed on vehicles and to be on hand at sites, reiteration of fire prevention and safety considerations during tailboard meetings, and daily monitoring of the RFW system with appropriate restrictions on types and levels permissible. Coordination procedures with federal and local fire officials, crew training, and methods for verifying that all Plan protocols and requirements are being followed shall also be included within the Plan. A Project fire marshal or similarly qualified role shall be established to enforce all provisions of the CFPP as well perform other duties related to fire detection, prevention, and suppressions for the Project. Construction activities shall be monitored to ensure implementation and effectiveness of the Plan.

The Applicant shall implement ongoing fire patrols during the fire season as defined each year by local, state, and federal fire agencies. These dates vary from year to year, generally occurring from late spring through dry winter periods. During RFW events, as issued daily by the NWS, all construction/maintenance activities shall cease, with an exception for transmission line testing, repairs, unfinished work, or other specific activities which may be allowed if the facility/equipment poses a greater fire risk if left in its current state.

All construction/maintenance crews and inspectors shall be equipped with radio or cellular telephone access that is operational in all work areas and access routes to allow for immediate reporting of fires. Communication pathways and equipment shall be tested and confirmed operational each day prior to initiating construction/maintenance activities at each work site. All fires shall be reported to the fire agencies with jurisdiction in the area immediately upon discovery of the ignition.

All construction/maintenance personnel shall be trained in fire-safe actions, initial attack firefighting, and fire reporting. All construction/maintenance personnel shall be trained and equipped to extinguish small fires in order to prevent them from growing into more serious threats. All construction/maintenance personnel shall carry at all times a laminated card and be provided a hard hat sticker that lists pertinent telephone numbers for reporting fires and defining immediate steps to take if a fire starts. Information on the laminated contact cards and hard hat stickers shall be updated and redistributed to all construction/maintenance personnel, and outdated cards and hard hat stickers shall be destroyed prior to the initiation of construction/maintenance activities on the day the information change goes into effect.

Construction maintenance/personnel shall have fire suppression equipment on all construction vehicles. Construction/maintenance personnel shall be required to park vehicles away from dry vegetation. Water tanks and/or water trucks shall be sited or available at active Project sites for

fire protection during construction. The Applicant shall coordinate with applicable local fire departments prior to construction/maintenance activities to determine the appropriate amounts of fire equipment to be carried on vehicles and, should a fire occur, to coordinate fire suppression activities.

APM FIRE-2: Fires shall be prevented or minimized by exercising care when operating utility vehicles within the right-of-way and access roads and by parking vehicles away from dry vegetation where hot catalytic converters could present the potential to ignite a fire. Fire protective mats or shields would be used during grinding or welding to prevent or minimize the potential for fire. In addition, the following fire prevention measures would be implemented:

- Because of the isolated nature of this site, the Project would develop onsite emergency water storage for fire suppression. The water storage system would include an aboveground metallic tank with no less than 1,000 gallons of storage capacity, as well as a pump and hose to dispense water in an emergency situation.
- Livestock grazing, that would be allowed to continue on the property and surrounding area,
 prevents fires by reducing flammable fuels in the Project vicinity. As practicable, livestock
 grazing programs should be designed and implemented so as to remove grass and forb
 vegetation immediately adjacent to the Project site prior to the commencement of fire
 season (March to September).

Vegetation that is capable of generating flame lengths greater than 12 feet would be evaluated annually and removed from the surface of the transmission line corridor as appropriate. This would include all woody vegetation types whose maximum average canopy exceeds six feet.

APM FIRE-3: In response to the need for fire mitigation during prolonged emergency response times, any Project facilities would be designed and constructed with resistance to wildfire ignition and consummation where feasible.

APM FIRE-4: All construction crews and inspectors shall be equipped with radio or cellular telephone access that is operational within the Project work area to allow for immediate reporting of fires. Fires shall be reported to the fire agencies with jurisdiction in the area upon discovery of the ignition. All construction personnel shall be trained in immediate steps to take if a fire starts, including fire reporting.

APM FIRE-5: LSPGC and/or its contractors shall notify applicable local fire departments of construction activities associated with the Project prior to construction and coordinate with emergency service providers regarding potential ingress and egress constraints that may occur.

Prior to construction, an agreement would be in place with agencies providing wildfire response services to the Project area that would ensure they have access through the gated entrance off Fern Road in case of emergency.

APM HAZ-4: LSPGC shall implement ongoing fire patrols during the fire season as defined each year by local, state, and federal fire agencies. These dates vary from year to year, generally occurring from late spring through dry winter periods. During RFW events, as issued daily by the NWS, all construction/maintenance activities shall cease, with an exception for transmission line testing, repairs, unfinished work, or other specific activities which may be allowed if the

facility/equipment poses a greater fire risk if left in its current state. The Project area is located within an area designated as a Very High or High Fire Hazard Severity Zone; thus, LSPGC will prepare a CFPP prior to construction.

All construction/maintenance crews and inspectors shall be provided with radio and cellular telephone access that is operational in all work areas and access routes to allow for immediate reporting of fires. Communication pathways and equipment shall be tested and confirmed operational each day prior to initiating construction/maintenance activities at each work site. All fires shall be reported to the fire agencies with jurisdiction in the area immediately upon discovery of the ignition. All construction/maintenance personnel shall be trained in fire-safe actions, initial attack firefighting, and fire reporting. All construction/maintenance personnel shall be trained and equipped to extinguish small fires in order to prevent them from growing into more serious threats. All construction/maintenance personnel shall carry at all times a laminated card and be provided a hard hat sticker that list pertinent telephone numbers for reporting fires and defining immediate steps to take if a fire starts. Information on laminated contact cards and hard hat stickers shall be updated and redistributed to all construction/maintenance personnel, and outdated cards and hard hat stickers shall be destroyed prior to the initiation of construction/maintenance activities on the day the information change goes into effect.

Construction/maintenance personnel shall have fire suppression equipment on all construction vehicles. Construction/maintenance personnel shall be required to park vehicles away from dry vegetation. Water tanks, fire extinguishers, and/or water trucks shall be sited or available at active Project sites for fire protection during construction. The Applicant shall coordinate with applicable local fire departments prior to construction/maintenance activities to determine the appropriate amounts of fire equipment to be carried on vehicles and, should a fire occur, to coordinate fire suppression activities.

During the construction phase of the Project, LSPGC and designated contractors will implement the measures as defined above.

5. OTHER PROJECT TOOLS & EQUIPMENT REQUIREMENTS

The following equipment may be required to be staged as proximate as possible to ongoing Project activities. These items should be strategically placed to afford the best opportunity to help prevent ignitions and expeditiously extinguish any fire resulting from Project activities. The standard fire tools to be included for construction activities on the Project are:

- Shovel: Standard round point shovel with overall length of at least 46".
- Pulaski: An axe-like fire hand tool used for cutting, chopping, or grubbing.
- McLeod: A fire hand tool used for raking and scraping.
- Backpack pump: A portable 5-gallon water pack with hose and nozzle used for extinguishing Class A (common combustibles) fires and primarily wildland fires. They can be collapsible backpacks, plastic (poly) tanks or steel tanks.

The following equipment, methods of operation, and mitigation procedures shall be implemented by construction in compliance with APM FIRE-2:

- Fire protective mats or shields will be used during grinding or welding to prevent or minimize the potential for fire.
- Vehicles shall be parked away from dry vegetation where hot catalytic converters could present the potential to ignite a fire.
- An onsite emergency water storage for fire suppression would be developed due to the isolated nature of the Project site. The water storage system would include an aboveground metallic tank with no less than 1,000 gallons of storage capacity, as well as a pump and hose to dispense water in an emergency situation.
- Livestock grazing should be allowed to continue on the property and surrounding area to
 prevent fires by reducing flammable fuels in the Project vicinity. As practicable, livestock
 grazing programs should be designed and implemented so as to remove grass and forb
 vegetation immediately adjacent to the Project site prior to the commencement of fire
 season (March to September).
- Vegetation capable of generating flame lengths greater than 12 feet will be evaluated annually and removed from the surface of the transmission line corridor as appropriate. This will include all woody vegetation types whose maximum average canopy exceeds six feet.

The Owner's Representative, in consultation with the jurisdictional fire agency, will determine additional equipment needs or requirements. These may include, but are not limited to:

- Wetting down sites, including vegetation, prior to and during construction/grading. This
 may require some application with a hose and nozzle to get areas sheltered from spray
 bar operations.
- Contractor will utilize their company Hot Work Program. The program, at a minimum, will
 meet National Fire Protection Association (NFPA) 51B requirements. Where feasible, hot
 work will be conducted in areas designated by the Owner's Representative.
 - During construction activities that are considered hot work, LSPGC will implement a 10-foot buffer around that activity, and vegetation will be cleared to ensure sparks do not create a fire hazard.
 - For activities that do not produce sparks but still have potential to produce a fire hazard such as ground rod or ground wire installation, LSPGC will implement a five-foot buffer to be cleared of vegetation.
- Designated parking areas for personal vehicles will be clearly marked and be clear of vegetation or other combustible materials.
 - Operations involving dispensing and/or storage of gasoline, diesel, and other fuels and combustible chemicals will have the appropriate signage, fire prevention equipment, and meet the requirements of the Project Hazardous Materials Management Plan as described in APM HAZ-2.

6. AGENCY SPECIFIC REQUIREMENTS

In accordance with APM HAZ-4 and APM FIRE-5, LSPGC shall notify applicable local fire departments of construction activities associated with the Project prior to construction and coordinate with emergency service providers regarding potential ingress and egress constraints that may occur. Prior to construction an agreement will be in place with agencies providing wildfire response service to the Project area that would ensure they have access through the gated entrance off Fern Road in case of emergency. Fire protection services in the vicinity of the Project site are provided by the Fire Safety and Sheriff Protection section within the Shasta County General Plan (Shasta County, 2004). The closest fire station to the Project site is Station 31, located approximately 1.5 miles to the southeast at 30480 Boggs Lane, Whitmore, CA 96096.

The Project activities must comply with the applicable portions of the following regulations:

- California Code of Regulations (CCR) Title 19 The California Fire Code establishes
 the minimum standards for the prevention of fire and the protection of life and property
 against fire, explosion, and panic. Title 19 also specifies that the NFPA standards and the
 NFPA Fire Protection Handbook may be used as authoritative guides in determining
 recognized fire prevention engineering practices.
- CCR Title 24, Part 9 The California Fire Code provides provisions for planning, precautions, and preparations for fire safety and fire protection during various activities. This includes, but is not limited to, construction, demolition, building requirements, and guidelines for working with flammable chemicals and materials (CCR, 2019).
- California Public Resources Code (PRC) Section 4292 Requires the clearing of flammable vegetation around specific structures that support certain connectors or types of electrical apparatus. An approximately 10-foot radius around such structures must remain clear of vegetation for the entirety of the fire season.
- PRC Section 4293 Requires specific clearance between conductors and vegetation. As
 the line voltage increases, the radius of clearance also increases. It is also required that
 some trees be removed if they pose the potential to fall on an electrical transmission line
 and cause damage.
- **CPUC GO 95** Governs the design, construction, and maintenance of overhead electrical lines.
- Public Utilities Code (PUC) 8385-8387, established by Senate Bill (SB) 1028 in 2016
 and amended by SB 901 in 2018 Requires each electrical corporation to construct,
 maintain, and operate its electrical lines and equipment in a manner that will minimize the
 risk of catastrophic wildfire posed by those electrical lines and equipment. The bill also
 requires each electrical corporation to annually prepare a wildfire mitigation plan and
 submit to CPUC for review.

Although the following CPUC General Order and Senate Bill (SB) do not explicitly apply to transmission-only utilities such as LSPGC, they were referenced in the development of the Project

and this Fire Plan with respect to applicable safety, emergency response, and fire prevention measures.

- GO 166 requires investor-owned utilities (IOUs) to develop emergency response and wildfire mitigation plans.
- SB 1241 Prohibits subdivision of parcels designated as very high fire hazard, or that are in an SRA, unless certain findings are made prior to approval of the tentative map. The statute requires that a city or a county planning commission make three new findings regarding fire hazard safety before approving a subdivision proposal. The three findings are, in brief: (1) the design and location of the subdivision and its lots are consistent with defensible space regulations found in PRC Section 4290-91, (2) structural fire protection services will be available for the subdivision through a publicly funded entity, and (3) ingress and egress road standards for fire equipment are met per any applicable local ordinance and PRC Section 4290.

Although local jurisdictions are preempted from regulating the Project, the following local plans were considered during Project development and subsequent impact analysis.

- Shasta County General Plan
- Shasta County Hazard Mitigation Plan
- Shasta County Emergency Operations Plan (Shasta County Office of Emergency Services, 2014)

7. RED FLAG WARNINGS AND OTHER CRITICAL FIRE DECLARATIONS

The NWS issues RFWs when weather conditions are conducive to the increased threat of wildfire. When there is a notice of a RFW, it will be for a specific geographic area and a specific time period. LSPGC and its contractors shall cease work during RFW events in areas where vegetation would be susceptible to accidental ignition by Project activities (such as use of equipment that could create a spark). In areas where no vegetation is present and, therefore, would not be susceptible to accidental ignition, Project work activities may proceed during RFW events. However, hot work may be limited or suspended for work occurring during RFW conditions. The Project Manager, Owner's Representative, and construction supervisors will be responsible for ensuring they, themselves, are notified of these events. It is also the responsibility of all construction supervisors to know and communicate the details of a RFW to their crews. At the end of the RFW, confirmation should be obtained from the Owner's Representative that work can begin again and if any restrictions are imposed on planned work activities.

At times, critical fire danger declarations may be made by any jurisdictional fire department for a specific time period. As soon as these declarations are shared with the Project Manager, they will be communicated to Project personnel. Restrictions and fire prevention measures will apply until the declarations are lifted. The jurisdictional fire departments may also direct LSPGC to cease any or all work activities in response to ongoing fire incidents.

During periods of extreme fire risk, work restrictions may be imposed. Unfinished work, repairs, or vegetation management may be allowed to continue if they pose a greater fire risk if left in their current state. The Owner's Representative will consult with the fire agencies in these situations.

8. TRAINING REQUIREMENTS FOR LSPGC & CONTRACT PERSONNEL

Prior to starting any work at the Project site, each Project worker will participate in training on Wildland Fire Prevention and Safety. This training will be provided as part of the Project's Worker Environmental Awareness Program (WEAP) training. Training will include a discussion of:

- **Fire prevention procedures** Key fire prevention measures such as vehicle and equipment parking, hot work protocols, and safety precautions for internal combustion engines.
- **Fire detection and reporting** All fires, whether Project related or not, are immediately reported to the appropriate fire protection agency (first), followed promptly by the Owner's Representative and Project Manager.
- Extinguishment tools and methods Key fire tools and requirements including the standard fire suppression tools and enhanced tools (e.g., water truck or water tank) that may be needed on the Project.
- **Fire response procedures** Small fires can be suppressed by Project personnel when safe to do so, otherwise crews are to evacuate and defer to trained Fire Patrols and the responding fire protection agency.
- **Fire reporting** All construction/maintenance personnel shall carry at all times a laminated card and be provided with a hard hat sticker that lists pertinent telephone numbers for reporting fires and defining immediate steps to take if a fire starts.

The Project's WEAP training will be offered throughout construction, as needed, in order to accommodate new Project personnel. All Project staff who complete the WEAP training must sign in and will receive a hard hat decal (i.e., stickers) and laminated card which will be used as a method for verifying that all Project personnel have received training. The WEAP training sign-in sheets will be maintained and tracked by LSPGC's Environmental Compliance Team and will be available to CPUC upon request.

9. TAILBOARDS, INSPECTIONS, REVIEW & COMPLIANCE

Construction supervisors will be responsible for reviewing the contents of the CFPP with construction personnel throughout the duration of the Project. Daily safety tailboard sessions will include a discussion of the fire risk for the day.

The Owner's Representative, or designee, shall perform periodic inspections of equipment and worksites to verify compliance with the CFPP. The assigned Owner's Representative has the authority and responsibility to inspect work sites (crews, vehicles, and equipment) to ensure compliance with the CFPP. Additionally, the assigned Project Safety Officers as well as LSPGC's

Environmental Compliance staff also monitor for compliance with the CFPP. Compliance with the CFPP is mandatory. Monitoring compliance with this Fire Plan is everyone's responsibility. The Project Manager, Owner's Representative and/or Site Foreman will have authority to shut down any operation that presents an inappropriate amount of fire risk or hazard until it can be properly addressed. They will also maintain a copy of the CFPP on site.

Deviations from the requirements of this Fire Plan will be addressed immediately. Appropriate consequences for repeated non-compliance or negligence in respect to this Fire Plan will be forwarded to the appropriate management for action.

All Project-related fires, regardless of size, shall be promptly reported to the fire agency having jurisdiction. The primary notification number for reporting an emergency is <u>911</u>. The Project Manager and Owner's Representative shall also be immediately notified.

10. COMMUNICATION PROTOCOL

Prior to the start of construction, LSPGC and/or its construction contractor will coordinate with local emergency response agencies, such as fire departments and police to review the Project location, work areas, anticipated construction activities, and schedule. These coordination efforts will continue throughout construction.

The Project Manager, Owner's Representative, and/or Site Foreman (or designee) will provide all construction personnel with access to an operational radio or cellular telephone to allow for reporting of fires or other emergencies. In compliance with APM FIRE-1 and APM FIRE-4, communication pathways and equipment will be confirmed operational each day prior to initiating construction activities at each worksite. At all times construction personnel shall carry a laminated card and be provided a hard hat sticker that lists pertinent telephone numbers for reporting fires and defines immediate steps to take if a fire starts, including the Project site address to provide 911 operators for emergency response. All personnel must know emergency communication procedures while on the Project.

Information on the laminated contact cards and hard hat stickers will be updated and redistributed to all construction personnel, and outdated cards and hard hat stickers will be destroyed prior to the initiation of Project activities on the day the information change goes into effect. An updated key personnel and emergency services contact (telephone and email) list will be kept on site by the Site Foreman and/or designee and available to construction personnel.

11. EMERGENCY RESPONSE

The primary first responder contact number for all incidents is <u>911</u>. Project personnel are instructed during the Wildland Fire Prevention and Safety training to only attempt to suppress a fire if they feel it is safe to do so. Project personnel will report all fires, even those that they are able to extinguish, immediately by dialing 911. If the personnel feel their safety is in any way at risk, Project personnel should be instructed to immediately leave the area. After first responders have been notified and it is safe to do so, reporting parties will then notify the Owner's Representative and appropriate Project management personnel.

The Project Manager, Owner's Representative, and/or Site Foreman will serve as the POC with the fire department in the event of an emergency. They will also manage the prevention, detection, control, and extinguishing of fires started accidentally as a result of construction activity.

In the event that there is a need to evacuate a site or sites, Fern Road would presumably be the primary evacuation route from the Project area. Fern Road connects to Oak Run Road to the north and Millville Plains Road to the south. Oak Run Road connects to California State Route (SR) 299 and Millville Plains Road connects to SR 44, which both lead west to Interstate 5 (I-5). I-5 would presumably be the main evacuation route for Shasta County. However, the evacuation may be altered depending on the nature and location of the emergency event. The evacuation route and location will be communicated to all personnel on the work site and accountability will be maintained throughout the evacuation by the designated POC.

Emergency access for first responders will be maintained throughout the entirety of the Project and first responder vehicles will be given the right of way. During an emergency, and when it is safe and practical to do so, a crew member will help guide first responders to the Project site.

The POC will review site-specific emergency procedures prior to construction beginning each day during the tailgate briefing.

12. REFERENCES

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Figure 1: Fire Hazard Severity Zones

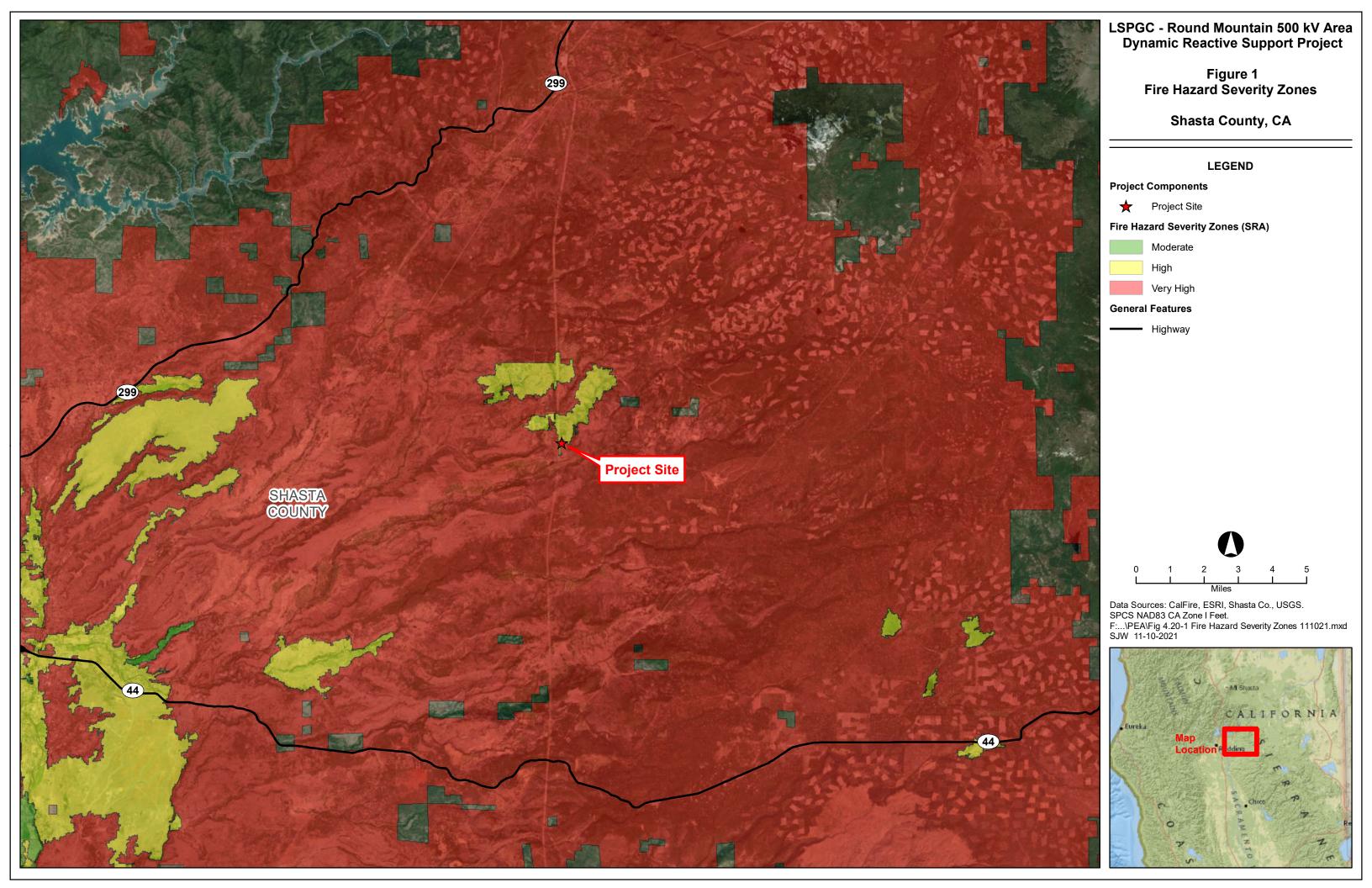


Figure 2: CPUC Fire Threat Districts

