

5.0 DECOMMISSIONING

As with any energy project, the Cotterel Wind Power Project will have a lifetime after which it may no longer be cost effective to continue operation. At that time, the project would be decommissioned, and the existing equipment removed. While it is possible the project owners may want to work with the BLM/IDL to re-power the site (replace existing wind energy project with a new project on the same site), re-powering is not being considered in this plan.

5.1 HEALTH, SAFETY, AND ENVIRONMENTAL PLAN

When the project moves into the decommissioning stage, the operations HSE plan will be modified to include the decommissioning activities. As decommissioning requires outside contractors, cranes, and large equipment be brought back to the site, the decommissioning HSE plan will be similar to the construction HSE plan.

Components of the Management System that will be addressed in the plan include, but are not limited to, risk management analysis, emergency response, HSE planning and procedures, implementation, monitoring and reporting results, setting performance targets, incident classification, investigation and reporting results, audits and inspections, and HSE management review.

Minimum contractor HSE requirements will be included in the plan. These are typically such requirements as personal protective equipment, housekeeping, maintaining a safe workplace, fire prevention, safe work practices, etc. Contractors are expected to comply with these requirements as a minimum. Contractor safety plans will be reviewed for compliance.

Contractor Best Management Practices will be reviewed and incorporated into the plan as appropriate.

Once the framework of the plan is completed, the project will be reviewed for site-specific HSE requirements and will be modified to incorporate them.

Also included in the HSE plan is a risk register that identifies potential hazards and the risks associated with them. Contractors are expected to address these risks and develop mitigation plans for incorporation into the register. The risk register is an evergreen document that will be used and updated on a continuous basis to identify and mitigate risks as they surface. It is conceivable that mitigation plans as developed may not prove to be sufficient as anticipated. In this case, the plan will be adjusted to provide a suitable solution to project risks.

Observation of HSE performance is a key to avoiding incidents. Project personnel will be expected to regularly observe work practices and provide positive reinforcement and guidance to fellow employees. Work practices that may be considered to place employees or the environment at risk will be identified, evaluated, and modified as necessary to eliminate or substantially reduce the risk.

5.2 PROJECT DECOMMISSIONING PLAN

The goal of project decommissioning is to remove the installed power generation equipment, and return the site to a condition as close to a pre-construction state as feasible. The major activities required for the decommissioning are:

- Wind turbine and meteorological tower removal
- Electrical system removal
- Structural foundation removal per ROW grant requirements
- Road removal
- Re-grading
- Re-vegetation

These activities are discussed in more detail in the subsequent sections. The specific requirements and approach for each activity is an estimate, since the technologies and construction techniques available when the project is decommissioned are expected to change.

5.3 WIND TURBINE/METEOROLOGICAL TOWER REMOVAL

The decommissioning activity most notable to the general public will be the removal of the wind turbines and meteorological towers. The disassembly and removal of this equipment will essentially be the same as its installation, but in reverse order.

5.3.1 Crane Movement and Assembly

When a large crane first arrives onto the project site, it will be taken to the location for its first turbine removal. The crane will be assembled on that site, and then used to disassemble the wind turbine. Once the turbine at that site is disassembled, the crane will be “walked” to the next turbine site using the cranes tracked base (see Figure 3-17). If the requirements for walking the cranes cannot be met with the project roads, road improvements may be required. At locations where the road cannot be improved to within the tolerances for walking the crane, the crane will be disassembled, moved to the next site, and reassembled.

If the crane pads built for the construction of the project were subsequently removed, or no longer meet the requirements for the crane, then crane pads will need to be installed or improved.

Potential environmental impacts caused by crane movement and assembly include:

- Public Safety (see Section 5.8.1)
- Wildlife: Sage-Grouse (see Section 5.8.2)
- Livestock (see Section 5.8.3)
- Dust (see Section 5.8.6)
- Noise (see Section 5.8.7)

5.3.2 Wind Turbine/Meteorological Tower Disassembly

The large components that make up a wind turbine will be disassembled in the reverse order they were assembled. The rotor (hub and blades) are removed from the nacelle and, with the help of a smaller crane, turned horizontally and set on the ground. Next, the nacelle will be removed from the top of the tower, followed by each portion of the tower. The meteorological tower would similarly be disassembled by a crane, starting with the upper tower section and moving downward.

Once the turbine rotor has been removed, a crew and small crane will disassemble it into the hub and three loose turbine blades.

Potential environmental impacts caused by wind turbine and meteorological tower disassembly include:

- Public Safety (see Section 5.8.1)
- Noise (see Section 5.8.7)

5.3.3 Component Removal

The most efficient manner for component removal will be for each large component (other than the rotor) to be placed directly onto a truck bed when it is removed from the turbine. These trucks could then immediately take the component off the site. This approach would limit the need for clearing an area around the turbine base to just enough area to set down the rotor.

When the rotor is disassembled, the blades will be placed into a carrying frame similar to the one shown in Figure 3-8. The blades in the frame can then be loaded onto a truck for removal from the site. The hub can also be removed once it is disassembled from the blades.

Potential environmental impacts caused by component removal include:

- Public Safety (see Section 5.8.1)
- Wildlife: Sage-Grouse (see Section 5.8.2)
- Livestock (see Section 5.8.3)
- Dust (see Section 5.8.6)
- Noise (see Section 5.8.7)

5.4 ELECTRICAL SYSTEM REMOVAL

5.4.1 Buried Cable Removal

Between each of the turbine locations will be a buried electrical cable and fiber optic cable. Section 2.3.6 of the FEIS does not specify if these cables are to be removed. The project owners will discuss with the BLM/IDL at the time of decommissioning if it is desired to remove these cables, or leave them in place. Removing the cables will cause some environmental impact that would need to be mitigated, but leaving them in place could impact future uses for the site.

If the cables are to be removed, a trench will be opened and the cables pulled out. The cables will be cut into manageable sections and removed from the site. The trenches would then be filled with native soil and compacted. The disturbed area will re-vegetated, in a manner discussed in Section 5.7.2.

Potential environmental impacts by buried cable removal include:

- Public Safety (see Section 5.8.1)
- Wildlife: Sage-Grouse (see Section 5.8.2)
- Livestock (see Section 5.8.3)
- Plant Species: Pediocactus (see Section 5.8.4)
- Noxious Weed Control (see Section 5.8.5)
- Dust (see Section 5.8.6)
- Noise (see Section 5.8.7)
- Water Resources (see Section 5.8.8)

5.4.2 Substation Disassembly and Equipment Removal

Once the project and transmission line is de-energized, the substation will be disassembled. Major components will be removed from their foundations and placed onto trucks using a small crane. The steel structures and control building will be disassembled and removed from the site. The fence will be taken down, and fence posts removed. The gravel placed in the substation will be removed if it was not native rock removed from excavations and crushed. Native rock will be scattered on-site.

The project owners will discuss with the BLM/IDL if the substation grounding grid is to be removed or left in place. The issues associated with the removal of the grounding grid are similar to those of the buried electrical cable, discussed in Section 5.4.1 above.

Potential environmental impacts caused by substation disassembly and equipment removal include:

- Public Safety (see Section 5.8.1)
- Livestock (see Section 5.8.3)
- Noxious Weed Control (see Section 5.8.5)
- Dust (see Section 5.8.6)
- Noise (see Section 5.8.7)
- Water Resources (see Section 5.8.8)

5.4.3 Transmission Line Removal

Assuming the transmission line no longer serves a purpose for the site, it will be disassembled and removed. Initially, the wires will be removed from the tower hangers and collected for recycling. The tower structures would then be disassembled and removed, including grounding rods to six inches below grade. The areas around the poles, along with any access roads that were necessary, will be reclaimed using the procedures discussed in Section 5.7 below.

Potential environmental impacts caused by transmission line removal include:

- Public Safety (see Section 5.8.1)
- Livestock (see Section 5.8.3)
- Plant Species: Pediocactus (see Section 5.8.4)
- Noxious Weed Control (see Section 5.8.5)
- Dust (see Section 5.8.6)
- Noise (see Section 5.8.7)
- Water Resources (see Section 5.8.8)

5.5 OPERATIONS AND MAINTENANCE BUILDING REMOVAL

If an O&M building is built on site, it will need to be demolished and removed. All equipment and furniture within the building will be removed, and then the building will be demolished. All debris from the demolition will be removed from the project site. Any installed septic system will also be abandoned in a manner consistent with state and local health regulations.

Potential environmental impacts caused by O&M building removal include:

- Public Safety (see Section 5.8.1)
- Livestock (see Section 5.8.3)
- Plant Species: Pediocactus (see Section 5.8.4)
- Noxious Weed Control (see Section 5.8.5)
- Dust (see Section 5.8.6)
- Noise (see Section 5.8.7)
- Water Resources (see Section 5.8.8)

5.6 STRUCTURAL FOUNDATION REMOVAL

When the wind turbines, meteorological towers, and substation components are removed from their foundations, the foundations need to be removed per the requirements of the ROW grant. The concrete and steel in the foundations will be broken-up and removed to a depth of six inches below grade, per Section 2.3.6 of FEIS. Shallow foundations (like that for the O&M building) will be removed in their entirety. All concrete and steel debris will be removed from the site.

Potential environmental impacts caused by structural foundation removal include:

- Public Safety (see Section 5.8.1)
- Wildlife: Sage-Grouse (see Section 5.8.2)
- Livestock (see Section 5.8.3)
- Plant Species: Pediocactus (see Section 5.8.4)
- Noxious Weed Control (see Section 5.8.5)
- Dust (see Section 5.8.6)
- Noise (see Section 5.8.7)
- Water Resources (see Section 5.8.8)

5.7 CIVIL DECOMMISSIONING ACTIVITIES

5.7.1 Road Removal

The BLM/IDL will have the choice when the project is decommissioned as to whether the project access roads are to be removed. To facilitate the various uses for Cotterel Mountain, the BLM/IDL may choose to leave the roads in place. If the roads are left, maintenance of the roads will become the responsibility of the BLM/IDL.

Once all the necessary equipment and materials have been removed from an area and the road to that area is no longer needed, it can be removed. The road surface and bed materials will be removed down to grade. Any materials native to Cotterel Mountain will be scattered across the site, and foreign materials removed.

Potential environmental impacts caused by road removal include:

- Public Safety (see Section 5.8.1)
- Wildlife: Sage-Grouse (see Section 5.8.2)
- Livestock (see Section 5.8.3)
- Plant Species: Pediocactus (see Section 5.8.4)
- Noxious Weed Control (see Section 5.8.5)
- Dust (see Section 5.8.6)
- Noise (see Section 5.8.7)
- Water Resources (see Section 5.8.8)

5.7.2 Re-grading and Re-vegetation

For areas where equipment or materials are removed, those areas will be re-graded back to pre-construction contours (if possible). Holes where foundations have been removed to six inches will be refilled with native soils. Removed roads will be re-graded to original contours if cuts and fills make such re-grading practical. Crane pads will also be re-graded.

All areas of disturbed ground will be re-vegetated using seed mixtures specified by the BLM/IDL.

Potential environmental impacts caused by re-grading and re-vegetation include:

- Public Safety (see Section 5.8.1)
- Wildlife: Sage-Grouse (see Section 5.8.2)
- Wildlife: Golden Eagles (see Section 5.8.2)
- Wildlife: Migratory Birds (see Section 5.8.2)
- Wildlife: Mule Deer (see Section 5.8.2)
- Wildlife: Mountain Lions (see Section 5.8.2)
- Livestock (see Section 5.8.3)
- Plant Species: Pediocactus (see Section 5.8.4)
- Noxious Weed Control (see Section 5.8.5)
- Dust (see Section 5.8.6)
- Noise (see Section 5.8.7)
- Water Resources (see Section 5.8.8)

5.8 POTENTIAL ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES FOR DECOMMISSIONING

5.8.1 Public Safety

Given that the site is owned and administered by the BLM/IDL, the public has a right to access the site and use it for recreation. This right will be balanced with the protection of public safety, a key aspect of the project HSE plan. To accomplish this, Windland will perform public education, site access control, fencing, and limited supervision activities.

Public Education: A project web site will be established to describe the status of the project, and disclose the upcoming activities. The project kiosk will remain until the end of decommissioning to explain current activities, and provide recommendations regarding safe practices on the project site. Additional outreach will be performed as necessary. The goal of this program is to provide information to the curious public without them needing to physically access the site.

Site Access Control: The project cannot limit public access to the site to a level lower than it was prior to the start of construction, except in those areas where public safety could be jeopardized (or where theft-control measures are appropriate). As the road onto the north end of Cotterel Mountain from Highway 81 will be heavily used by decommissioning vehicles, the project owners will close this road to the public during decommissioning times. Keeping the public off this road while the decommissioning vehicles and equipment are using it will enhance the safety both for the public and for the project personnel. The other roads onto the mountain will not be altered or closed.

As site access control is one of the primary means to provide for public safety, it will be closely monitored. The project owners will work with the BLM/IDL to make any necessary changes during the decommissioning period to improve public safety.

Fencing: For those areas where public safety could be endangered, Windland will install temporary fencing. The areas where temporary fencing will be used include open trenches and excavations where a fall hazard exists. Temporary fencing will also be placed around the lay-down area to limit the potential for theft and public injury. The intention is to install chain-link fencing around the lay-down areas, and around danger areas if livestock are present on the site. If no livestock are present, plastic warning fencing may be used around dangerous areas to minimize environmental impact.

Limited Supervision: During short-duration decommissioning activities such as wind turbine disassembly, Windland will have crews on-site performing the activity and monitoring overall safety. Crew members and safety monitors will be trained to ask members of the public to maintain a safe distance from the work zone. Neither the crew members nor the safety officers have the authority or responsibility of keeping all members of the public away from the decommissioning zone, especially if members of the public choose to ignore posting signs or requests for them to keep some distance from the decommissioning zone.

5.8.2 Wildlife

Sage-Grouse

Impacts: The success of the sage-grouse is directly dependent on the health of the sagebrush shrub-steppe community. Land clearing for the project may affect the area population.

Mitigation: Clearing of sagebrush community will be minimized to the maximum extent possible at the project site. In addition, methods of avoiding or minimizing fragmentation of the community will be taken into account prior to clearing.

Six leks (spring courtship grounds) have been identified in the project area. Development will avoid the on-site areas and minimize clearing, grubbing, or otherwise disturbing natural vegetation in the vicinity, especially the sagebrush shrub community. There will be no activity within one-half mile of known leks during the spring mating season, defined to be between one-half hour before sunrise and 11:00 a.m. between March 15 and May 15. Decommissioning activities are only allowed during daylight hours. Off-limit areas during the mating season will be appropriately marked so that workers in the area are aware of these sensitive areas. Notification will also be placed in areas frequented by on-site personnel (such as break rooms and restrooms) to advertise the importance of avoiding these areas.

Monitoring: Signage or other markings for restricted activity areas will be checked at minimum once each week to insure presence and proper placement. Damaged or missing signage will be replaced as soon as possible. Site managers will observe restricted areas and be responsible for taking appropriate actions if entry to these areas occurs. Persons responsible for environmental compliance will be cognizant of site clearing activities and insure that impacts to the sagebrush community are minimized to the extent possible.

Staff will also be asked to report any sightings of sage-grouse on the project site, especially near the leks during the spring mating season. Significant numbers of sage-grouse found in areas without identified leks will be reported to the BLM/IDL for further inspection.

Golden Eagles

Impacts: Golden Eagles are protected under the Bald Eagle Protection Act. Three golden eagle nests were observed within the boundary of the project site, and were active during the avian monitoring performed in 2003. As with other birds, the loss of vegetation within the project site could lead to a loss of habitat for the eagles.

Mitigation: As no wind turbines will have been installed within one-quarter mile of a golden eagle nest, no particular mitigation should be required during decommissioning.

Monitoring: The project site will be visually monitored on a weekly basis, at minimum. Any golden eagle carcasses discovered will be brought to the attention of the BLM/IDL Authorized Officer.

Migratory Birds

Impacts: The Migratory Bird Treaty Act provides protection to many birds found in the project area. On this basis impacts to migratory species could result from removal of vegetation (clearing, grubbing, etc.) during site preparation or lesser impacts such as unnecessary trampling vegetation.

Mitigation: The removal of natural vegetation (grassland, shrub, and forest communities) will be minimized to the extent possible during decommissioning. In addition the movement of personnel and equipment on site will be limited to decommissioning areas to avoid unnecessary trampling of area vegetation.

Monitoring: No particular monitoring for impacts to migratory birds will be performed during decommissioning.

Mule Deer

Impacts: Mule deer are common in the project area and are expected to avoid the site during decommissioning due to noise and related activities. Once the re-vegetation takes effect, the amount of habitat for mule deer may slightly increase.

Mitigation: Indirect effects that could cause degradation of remaining habitat will be minimized by controlling activities that would result in the spread of noxious weeds, avoiding impacts to areas not associated with the project, and re-vegetating areas with native vegetation where feasible.

Monitoring: The project site will be visually monitored on a weekly basis, at minimum, to insure that decommissioning sites, laydown areas, roadways, and associated activities potentially impacting habitat are limited to areas agreed to prior to construction. Irregularities and/or violations will be reported immediately to project management and corrective actions taken.

Mountain Lions

Impacts: Mountain lions have been observed on Cotterel Mountain. These animals, however, are reclusive and during decommissioning are expected to avoid the project site. Mountain lions could be indirectly affected if food resources, such as the mule deer population, were significantly reduced, but this is not anticipated.

Mitigation: No specific mitigation is provided. Personnel on site are expected to be advised of the potential for occurrence of mountain lions in the area.

Monitoring: No specific monitoring program is anticipated. Incidents of mountain lions being impacted directly by decommissioning, either by being scared away from the site or by being hit by construction vehicles, will be reported to the BLM/IDL for further action. Personnel on-site will be notified via signage of the potential for occurrence of mountain lions in the area.

Big Horn Sheep

Big horn sheep are not currently known to occur on Cotterel Mountain. Therefore no impacts are anticipated and no mitigation is provided.

5.8.3 Livestock

Impacts: Indirect impacts could result in degraded rangeland conditions caused by the spread of invasive and noxious weeds, which in turn is caused by the ground disturbances associated with the construction and operation of the project. The livestock are expected to adjust to the increased traffic during decommissioning.

Mitigation: Re-vegetation efforts will be applied to areas disturbed by decommissioning activities. Also, any open trenches or pits that are left unattended will be fenced for safety, and existing cattle guards will be left in place. If livestock are expected to be on-site during these times, the safety fencing will be chain-link rather than plastic. Also, there exist some livestock watering tanks and pipes on the project site. If any portions of the livestock watering system are damaged during decommissioning while livestock are on the project site, the system will be repaired as soon as possible. If no livestock are present, the system will be repaired before livestock are brought back to the site.

Monitoring: The project site will be visually monitored on a weekly basis, at minimum, to insure that decommissioning sites, laydown areas, roadways, and associated activities potentially impacting grazing lands are limited to areas agreed to prior to decommissioning. Irregularities and/or violations will be reported immediately to project management and corrective actions taken.

Staff will be asked to report any incidents of interaction with livestock, or livestock found close to the construction areas. If livestock are found to be attracted to the decommissioning traffic or activities such that it increases their risk of injury, further mitigation measures will be discussed with ranchers, which may include the project relocating the livestock to off-site grazing areas for the remainder of decommissioning.

5.8.4 Protected Plant Species

No threatened or endangered species listed by the federal Endangered Species Act are found on the project. Simpson's hedgehog cactus (*Pediocactus simpsonii*) occurs at the site and is listed by the BLM as a special status species.

Pediocactus simpsonii

Impacts: Nearly every portion of Cotterel Mountain supports populations of *Pediocactus simpsonii* (Simpson's hedgehog cactus). The primary impact to the cactus population will be from surface disturbance. Clearing, grading, and excavation of any type will permanently eliminate any plants present. In addition, trampling plants by equipment or individuals, accidental spills, or burning could affect the species as well as its habitat.

The same impacts listed above can result in indirect impacts to the cactus. The degradation of habitat that does not support cactus but is in the vicinity of cactus populations can facilitate invasion by weeds that eventually encroach and degrade cactus habitat.

Mitigation: Project decommissioning personnel will be encouraged to avoid damaging or removing a Simpson's hedgehog cactus wherever possible. Where impacts are unavoidable, it may be possible to move the cactus to unaffected areas of the project site, but this tactic will be discussed with appropriate BLM/IDL personnel familiar with the plant prior to moving the cactus.

Monitoring: Large Simpson's hedgehog cactus populations in close proximity to decommissioning activities will be field marked for avoidance. These sites will be monitored at least once each week during the decommissioning phase. Damaged or missing signage will be replaced as soon as possible. Site managers will casually observe these restricted areas and be responsible for taking appropriate actions if these areas are violated.

5.8.5 Noxious Weed Control

Impacts: Clearing, grading, and excavation activities associated with decommissioning potentially create new habitat for the invasion of weeds. The same is true where trampling, accidental spills, burns, and similar actions degrade existing native habitat. The effects of these impacts are usually permanent or at least require years to heal in arid environments like that found in the project region. Adjacent undisturbed areas are indirectly impacted by the invasion of weed species simply due to proximity and an increase in the numbers of plants foreign to the area that produce offspring by seed or vegetative means.

Mitigation: The control of noxious weeds is difficult. Some weeds may enter the site on equipment and vehicles, while others may spread from distant areas by spores blowing onto the site in the wind. All large construction equipment (such as earthmovers and cranes) will be required to be cleaned prior to entering the site. A truck wash will be established near the base of the project access road near Highway 81, and every vehicle going to the top of the mountain will have its wheels and undercarriages washed. The project owners will work with the BLM/IDL and the Cassia County Weed Control office to update the weed control program for the project decommissioning activities, which will entail spot spraying with approved pesticides along disturbed areas for noxious and invasive weed species. The frequency of the spraying will be based on the season and the amount of water used for dust control, and will be adapted based on monitoring results.

Monitoring: A noxious weed inventory will be performed before the start of decommissioning. The project owners will work with the Cassia County Weed Control office to perform monthly weed surveys on the project site during the spring and summer months of the decommissioning phase of the project.

5.8.6 Dust

Impacts: Temporary and localized impacts from dust would occur from the decommissioning phase due to vehicular traffic, grading, and other soil disturbances. Large

amounts of dust generation could impact vehicular traffic on Highway 81 and Interstate 84, and be a source of nuisance to local residents.

Mitigation: During decommissioning some localized increase in dust levels will be unavoidable. To minimize these levels, the project owners will use water or other dust control measures on heavily used roads, and traffic speed will be held to appropriate levels. Disturbed areas will be re-vegetated or otherwise covered as soon as possible following disturbance.

Monitoring: Periodic observations will be made from off-site to determine the amount of dust being generated, and the amount leaving the site. If the mitigation measures are found to be ineffective, alternative measures will be determined in coordination with the BLM/IDL.

5.8.7 Noise

Local noise levels will be affected temporarily by decommissioning activities (such as equipment movement), but due to the remote nature of the site no impacts are anticipated to residences or businesses. Wildlife will avoid the project area to some degree due to decommissioning noise but for the most part is expected to return to the area upon completion of decommissioning.

Impacts: The project site is remote and unpopulated with the nearest residence approximately two miles away. Impacts during decommissioning are expected to be limited to workers on-site and wildlife and livestock in the immediate vicinity.

Mitigation: All decommissioning will take place during daylight hours.

Monitoring: Through communications with the local communities, Windland will be kept informed of any noise complaints. If significant noise complaints are received, noise measurements will be taken along the project boundary or near the complaint sources to ascertain the true noise levels. If noise levels are found to be unsatisfactory, alternative mitigation measures will be explored.

5.8.8 Water Resources

Impacts: Ground disturbances associated with the construction of the project pose the greatest potential for impact to surface water resources in the form of sedimentation due to soil erosion. Spills or leaks of fuels, oils, or hazardous materials may affect local water resources.

Mitigation: The use of best management practices will avoid impacts to water resources. A SWPPP and SPCCP may be required for the decommissioning, if major road removal is required.

Monitoring: The SWPPP and SPCCP will include site investigation protocols.

5.8.9 Spill Prevention Plan

Impacts: All equipment has the potential to leak fuels, oils, and other liquids, and small amounts of various products may be stored at the project site, which pose spill or leak potential.

Mitigation: A SPCCP will be part of the project's HSE plan, and may also be prepared for the project as part of the storm water program as required under 40 CFR Part 112. If necessary, a site specific program will be crafted to address any issues considered unique to this project, such as:

- Inspections of truck bottoms during weed control activities
- Inspection of trucks that stay on-site for long periods (such as concrete trucks and cranes)
- Special considerations for fuel trucks
- Inspection practices for wind turbine hydraulic lines and coolant systems
- Spill clean-up protocol
- Fuel tanks should be double-walled or should be located in a secondary (bunded) containment area. The secondary containment area should be able to contain at least 110% of the full volume of the fuel tank.

Monitoring: The SPCCP will include the spill monitoring protocol.

5.8.10 Fire Prevention Plan

Impacts: Fires are not common on wind energy project sites because no combustion occurs as part of the energy generation process and most distributional transmission lines are buried. However, it is possible the site could be threatened by wildfires, fires ignited by lightning, or fires caused by human activity in the project area. A large fire could destroy a significant amount of vegetation on the site, and be a threat to wildlife, livestock, and visitor safety. Such a fire could also seriously damage the wind turbines and substations.

Mitigation: The site HSE manual will provide a list of emergency contacts in case of a fire. Fire extinguishers will be located in the base of each wind turbine tower, in each project vehicle, in the substation control building, and the O&M building. Personnel performing "hot work", such as welding, will be required to have a fire extinguisher, a five-gallon backpack hand water pump, and fire-fighting hand tool, such as a shovel, Pulaski, or a mcleod nearby. Vegetative materials removed during the decommissioning process will be treated or removed to reduce fire vulnerability. If a water truck is used for dust abatement, this piece of equipment will be maintained full of water and fuel so that it is in a condition where it could be readily used in case of fire. Smoking will be restricted to designated areas, and off-road parking will be restricted. Signs will be posted in periodic locations on the site to remind personnel of the emergency response procedures, liabilities, and contact telephone numbers.

Normally, any ignitions that cannot be immediately controlled by project personnel acting within the purview of their training and equipment will be responded to appropriately by initial attack forces from the BLM South Central Idaho Fire Organization located in Shoshone, Burley, and Twin Falls, Idaho. However, if fire danger levels warrant additional

protection, or if preparedness levels on either the local or national level reach a threshold where local forces are spread too thin to provide immediate initial attack response, the Authorized Officer may require that additional wildland fire suppression capabilities be pre-positioned in the proximity of the project area for initial attack purposes. These capabilities may be either agency-owned or contracted by the BLM under Emergency Equipment Rental Agreements (EERA). In either case, they will be funded by the ROW grant holder. Contract engines will meet minimum National Wildfire Coordinating Group (NWCG) standards for equipment used in wildland firefighting and will be inspected by Burley BLM Fire Personnel before being placed in service. Assurance of continued compliance with NWCG standards will be the responsibility of the BLM.

Mitigation will be dependent on fire conditions and other special circumstances prevailing in the project area. If necessary, specific actions could include, but not be limited to, actions such as:

- Restriction of certain on-site high risk activities (e.g., welding) or suspension of all on the ground decommissioning activities when red flag conditions occur
- Establishment of spotter positions on key locations within the project area
- Road closures or travel restrictions when fire dangers are high
- Pre-positioning fire suppression capabilities (e.g., contracted engine crews) under high or extreme fire conditions

Determination of need for additional protection measures will be made by the Authorized Officer.

Monitoring: If project site personnel find a fire, they will respond within the guidelines of the HSE manual and their levels of training and available equipment. If a fire is located on the site that cannot be immediately extinguished, a call will be made for emergency support and the site will be evacuated until the fire is extinguished. All fire restrictions that apply to the public also apply to work crews in the project area, unless special provisions are in place and approved by the Authorized Officer.

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