APPENDIX H
FRAMEWORK FIRE PROTECTION PLAN

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ACRONYMS

Applicant	TransWest Express LLC, also TransWest
BLM	Bureau of Land Management
BMP	Best Management Practice
CFR	Code of Federal Regulations
CIC	Compliance Inspection Contractor
COM Plan	Construction, Operation, and Maintenance Plan
DEIS	Draft Environmental Impact Statement
EMF	Electromagnetic Field
NESC	National Electrical Stately Code
NIFC	National Interagency Fire Center
NTP	Notice to Proceed
OSHA	Occupational Safety and Health Administration
Plan	Fire Protection Plan
POD	Plan of Development
Project	TransWest Express Transmission Project, also TWE Project
ROW	right-of-way
TransWest	TransWest Express LLC, also Applicant
TWE Project	TransWest Express Transmission Project, also Project
USFS	United Stated Forest Service
WSFD	Wyoming State Forestry Division

H1.0 INTRODUCTION

This framework Fire Protection Plan (Plan) describes the measures to be taken by TransWest Express LLC's (TransWest or Applicant) and its Construction Contractor(s) to ensure fire prevention and suppression measures are carried out in accordance with federal, state, and local regulations for the TransWest Express Transmission Project (TWE Project or Project). Measures identified in this Plan apply to work within the Project area defined as the right-of-way (ROW); access roads; temporary work and storage areas; and other areas used during construction and operation of the TWE Project. This document provides direction for the detailed final Plan to be developed by the Construction Contractor(s).

H2.0 PLAN PURPOSE

The purpose of the Fire Protection Plan is to provide safe procedural practices, environmental protection measures, and other specific stipulations and methods to prevent and respond to fires during construction and operation of the Project. The final Plan will provide construction crews, environmental monitors, and the Compliance Inspection Contractor (CIC) with Project-specific information concerning fire protection procedures. The detailed final Plan will define fire prevention practices, establish fire protection requirements, control of combustible materials and flammable liquids and establish communication for agency responses in the event of a fire.

H3.0 PLAN UPDATES

This framework Plan will be updated for the Notice to Proceed (NTP) Plan of Development (POD) and will include a restricted operations section, complete notifications section, and updated relevant mitigation measures to ensure regulation compliance and safety. The Plan will include updates as needed based on final design and engineering and per agency requirements. The Construction Contractor(s) will be responsible for preparing and implementing the final Plan in compliance with all local, state, and federal regulations pertaining to fires.

H4.0 REGULATORY

H4.1 Wyoming's Wildfire Protection System

The prevention and suppression of wildfires in southern Wyoming is carried out by the Bureau of Land Management (BLM), U.S. Forest Service (USFS), and local fire districts and agencies. The agencies' activities are closely coordinated, primarily through the National Interagency Fire Center (NIFC) in Boise, Idaho, and Regional Interagency Dispatch Centers in Casper and Rawlins, Wyoming. Individual fire crews from BLM Field Offices and Forest Service Ranger Districts coordinate fire suppression activities on federal land within their jurisdictions. The Wyoming State Forestry Division (WSFD) is responsible for fire suppression on Wyoming state lands. Local fire districts and agencies provide fire prevention and suppression activities on private land, and may assist with fires on state or federal lands as requested by those agencies.

H4.2 Colorado's Wildfire Protection System

The prevention and suppression of wildfires in northwest Colorado is carried out by the BLM, USFS, Colorado Division of Fire Prevention and Control, and local fire districts and agencies. The agencies' activities are closely coordinated, primarily through NIFC in Boise, Idaho, and Regional Interagency Dispatch Center in Craig, Colorado. Individual fire crews from BLM Field Offices and Forest Service Ranger Districts coordinate fire suppression activities on federal land within their jurisdictions. Local fire districts and agencies provide fire prevention and suppression activities on private land, and may

assist with fires on state or federal lands as requested by those agencies. County Sherriff offices coordinate fire suppression activities in the counties as well as un-incorporated portions of counties.

H4.3 Utah's Wildfire Protection System

The prevention and suppression of wildfires in Utah is carried out by the BLM, USFS, Utah Division of Forestry, Fire and State Lands, and local fire districts and agencies. The agencies' activities are closely coordinated, primarily through NIFC in Boise, Idaho, and the Eastern Great Basin Geographic Area Coordination Center in Salt Lake City, Utah. Individual fire crews from BLM Field Offices and Forest Service Ranger Districts coordinate fire suppression activities on federal land within their jurisdictions. The Utah Division of Forestry, Fire and State Lands provide fire suppression activities on state and private lands. Local fire districts and agencies provide fire prevention and suppression activities on private land, and may assist with fires on state or federal lands as requested by those agencies.

H4.4 Nevada's Wildfire Protection System

The prevention and suppression of wildfires in southern Nevada is carried out by the BLM, USFS, Nevada Division of Forestry, and local fire districts and agencies. The agencies' activities are closely coordinated, primarily through NIFC in Boise, Idaho, and Western Great Basin Geographic Area Coordination Center in Reno, Nevada. Individual fire crews from BLM Field Offices and Forest Service Ranger Districts coordinate fire suppression activities on federal land within their jurisdictions. The Nevada Division of Forestry provides fire suppression activities on state and private lands and may assist with fires on state or federal lands as requested by those agencies. Local fire districts and agencies provide fire prevention and suppression activities on private land, and may assist with fires on state or federal lands as requested by those agencies.

H5.0 FIRE PROTECTION PLAN CONTENTS

The Fire Protection Plan will include information on the following topics:

1. Worker Training
2. Smoking Restrictions
3. Spark Arresters
4. Parking, Vehicle operation, and Storage Areas
5. Equipment
6. Road Closures
7. Refueling
8. Burning
9. Flammable Liquids and Explosives
10. Communications
11. Welding
12. Fire Suppression
13. Restricted operations
14. Monitoring

H6.0 FIRE PREVENTION PLAN GUIDANCE

Components of this Plan will include, but are not limited to: requiring work vehicles to carry shovels, water, and fire extinguishers; operating all vehicles on designated roads; parking in designated areas or areas free of vegetation; and operating welding, grinding, or cutting activities in areas cleared of vegetation. To minimize the occurrence of fire from the power line, safety measures would be taken that include brush-clearing within the corridor prior to work, enforcing red flag warnings, providing appropriate training to all pertinent personnel, and keeping vehicles on or within designated roads or work areas.

The presence of explosive materials on the Project site could potentially increase the risk of fire during construction. Special precautions will be taken to minimize this risk in conjunction with the Appendix C - Blasting Plan Framework, including but not limited to:

- Prohibiting ignition devices within 50 feet of explosives storage areas;
- Properly maintaining magazine sites so they are clear of fuels and combustible materials, well ventilated, and fire-resistant;
- Protecting magazines from wildfires that could occur in the immediate area;
- Posting fire suppression personnel at the blast site during high fire danger periods; and
- Prohibiting blasting during extreme fire danger periods.

H7.0 DESIGN FEATURES AND BEST MANAGEMENT PRACTICES

In addition to applicable design and operational standards, regulations, laws and permit requirements, the following design features and best management practices (BMPs) have been developed to avoid or minimize potential fire related impacts. Note that the Construction, Operation and Maintenance Plan will be a part of the NTP POD.

TWE-51: The TWE Project will be designed, constructed, and operated to meet or exceed the requirements of the National Electrical Safety Code (NESC), U.S. Department of Labor, Occupational Safety and Health Administration (OSHA) standards, and the Applicant's requirements for safety and protection of landowners and their property.

TWE-53: The Construction, Operation and Maintenance (COM) Plan will include a Blasting Plan, which will identify methods and mitigation measures to minimize the effects of blasting, where applicable. The Blasting Plan will document the proposed methods to achieve the desired excavations, proposed methods for blasting warning, use of non-electrical blasting systems, and provisions for controlling fly rock, vibrations, and air blast damage.

TWE-56: As part of the COM Plan, the Applicant will provide a Health and Safety Plan, which will outline measures to protect workers and the general public during construction, operation, and decommissioning of the TWE Project. The Health and Safety Plan will identify applicable federal and state occupational safety standards, establish safe work practices, and define safety performance standards.

TWE-64: The COM Plan will include a Fire Protection Plan. The Applicant or its Contractor(s) will notify the BLM of any fires and comply with all rules and regulations administered by the BLM and USFS concerning the use, prevention, and suppression of fires on federal lands, including any fire

prevention orders that may be in effect at the time of the permitted activity. The Applicant or its Contractor(s) may be held liable for the cost of fire suppression, stabilization, and rehabilitation. In the event of a fire, personal safety will be the first priority of the Applicant or its Contractor(s). The Applicant or its Contractor(s) will:

- Operate all internal and external combustion engines on federally-managed lands per 36 Code of Federal Regulations (CFR) Part 261.52(j), which requires all such engines to be equipped with a qualified spark arrester that is maintained and not modified;

- Carry shovels, water, and fire extinguishers that are rated at a minimum as ABC-10 pound on all equipment and vehicles. If a fire spreads beyond the suppression capability of workers with these tools, all workers will cease fire suppression action and leave the area immediately via pre-identified escape routes;

- Initiate fire suppression actions in the work area to prevent fire spread to or on federally-administered lands. If fire ignitions cannot be prevented or contained immediately, or it may be foreseeable that a fire would exceed the immediate capability of workers, the operation must be modified or discontinued. If the operation area is evacuated there will be no risk of ignition or re-ignition upon leaving.

- Notify the appropriate fire center immediately of the location and status of any escaped fire;

- Review weather forecasts and the potential fire danger prior to any operation involving potential sources of fire ignition from vehicles, equipment, or other means. Prevention measures to be taken each work day will be included in the specific job briefing. Consideration will be given to additional mitigation measures or temporary discontinuance of the operation during periods of extreme winds or dryness;

- Operate all vehicles on designated roads and park in designated areas or areas free of vegetation;

- Operate welding, grinding, or cutting activities in areas cleared of vegetation within range of the sparks for that particular action. A spotter will be required to watch for ignitions; and

- Use only diesel-powered vehicles in areas where excessive heat from vehicle exhaust systems could start brush or grass fires.

Additional BMPs and Mitigation Measures identified in the Draft Environmental Impact Statement (DEIS) are listed below. The identified BMPs and Mitigation Measures have not been finalized at this time and may be updated, changed, or eliminated in future revisions of this Plan.

PHS-1: The Applicant shall prepare an explosives use plan that specifies the times and meteorological conditions when explosives will be used and specifies minimum distances from sensitive vegetation and wildlife or streams and lakes.

PHS-4: A health and safety program shall be developed by the Applicant to protect both workers and the general public during construction, operation, and decommissioning of an energy transport project. The program should identify all applicable federal and state occupational safety standards, establish safe work practices for each task (e.g., requirements for personal protective equipment and safety harnesses, OSHA standard practices for safe use of explosives and blasting agents, measures

for reducing occupational electromagnetic field [EMF] exposures), and define safety performance standards (e.g., electrical system standards). The program should include a training program to identify hazard training requirements for workers for each task and establish procedures for providing required training to all workers. Documentation of training and a mechanism for reporting serious accidents to appropriate agencies should be established.

FIRE-1: The Applicant shall develop a fire management strategy to implement measures to minimize the potential for a human-caused fire during Project construction, operation, and decommissioning. The strategy should consider the need to reduce hazardous fuels (e.g., native and non-native annual grasses and shrubs) and to prevent the spread of fires started outside or inside a corridor, and clarify who has responsibility for fire suppression and hazardous fuels reduction for the corridor.

FIRE-2: The Applicant must work with the local land management agency to identify Project areas that may incur heavy fuel buildups, and develop a long-term strategy on vegetation management of these areas. The strategy may include land treatment during Project construction, which may extend outside the planned ROW clearing limits.

FIRE-3: The Applicant must ensure that all construction equipment used is adequately muffled and maintained and that spark arrestors are used with construction equipment in areas with, and during periods of, high fire danger.

FIRE-4: Flammable materials (including fuels) will be stored in appropriate containers.