

Dolores Canyon Solar – Fire Protection Plan

Site Specific Development Plan/Land Development Agreement Application Appendix item 19

Introduction

Dolores Canyon Solar LLC (“Company”), a subsidiary of boulder-based solar energy developer juwi Inc., looks forward to working in concert with Dolores County to permit the 110 megawatt/ac Dolores Canyon Solar facility (“Project”) on several hundred acres of land a few miles northeast of Cahone, near the intersection of County Roads 15 & M.4 and environs. The Company is a builder of solar farms across the country and has over twelve years of experience working in Colorado and the West managing the arid and semi-arid landscape of solar farms both during and after construction.

Plan Purpose

Article IV, §2(D)(3) of the Dolores County Land Use Regulations codifies fire protection measures for new developments and changes in land use. The Company recognizes that the Project is located in an area considered to be of medium-to-high risk for wildland fires. The purpose of this plan is to outline juwi’s best practices for fire-cognizant construction methods in light of both prior experience as well as discussion with the Colorado State Forest Service’s Mark Lovell (Supervisory Forester, Durango Field Office) Mark Lovell.

Project Description

The Project will consist of a solar photovoltaic energy generation facility. Most of the fenced Project area will contain solar modules arranged on a sun-tracking structures. Some of the surface in the Project area will be graded to develop a consistent surface topography for the solar panel array.

The Project will include a short overhead transmission line to the Cahone Substation, owned by Tri-State Generation & Transmission Association. The overall fenced Project area is roughly 800 acres.

The majority of the fenced Project area will be revegetated with a native low-growth seed mix, determined specifically for the region’s climate and soils.

Fire Protection during Construction

Most of the site is already free of vegetation as it is actively farmed. The first step in the construction process is to clear and mow the limited peripheral Project areas containing existing vegetation, which consists mostly of native and introduced grasses, weeds, chapparal, and limited piñon-juniper forest. After the initial mow and clearing of vegetation, the site will be mowed as-needed to maintain a vegetation height below 18 inches.

The Fire Protection Plan for the Project during construction consists of fire prevention and protection policies which are incorporated in the company Safe Work Practices and also reviewed in the mandatory site orientation. For example, during hot-work, such as welding, a fire watch is required, clearing the area of all combustible material, as well as completing a hot-work notification in advance with the Dove Creek Volunteer Fire Department. Waste management and housekeeping is performed daily, and combustible materials are removed and disposed of promptly.

Company site personnel are trained to enforce these policies and site safety inspections are documented during active work. All personnel are instructed to call **911** in case of an emergency.

Fire Prevention policies include:

1. Employees must know how to recognize and report hazardous conditions and fire hazards associated with the materials and processes to which employees are exposed.
2. Good housekeeping must be practiced to prevent the accumulation of flammable and/or combustible material.
3. Flammable liquids must be stored in properly labeled approved containers in designated cabinets or storage areas away from sources of ignition.
4. Smoking shall be prohibited at or in the vicinity of operations that constitute a fire hazard and shall be conspicuously posted "No Smoking or Open Flame".
5. Personnel must know and follow the site's requirements for the use and handling of oily rags.
6. Unused wooden pallets must be taken to the designated storage area.
7. Flammable liquids must not be transferred into containers unless the nozzle and container are electrically interconnected (bonded).
8. Flammable liquids must not be dispensed by gravity from tanks, drums, barrels, or similar containers except through a listed self-closing valve or self-closing faucet. (Listed means tested and listed by a recognized testing laboratory, such as UL or FM).
9. Flammable or combustible liquids are not to be used for general cleaning purposes.
10. Compressed gas cylinders must not be stored with flammable or combustible liquids.
11. No objects or materials that restrict clear access shall be placed in front of electrical panels or disconnects.
12. Electric control panel covers must remain in place and/or with the doors closed.
13. Portable space heaters may not be used without prior approval from a supervisor and site management.

Fire Protection policies include:

Fire extinguishers shall be present in all site vehicles and must be nearby when there is any potential for fire ignition.

1. Any damaged or spent portable fire extinguishers must be reported to a supervisor or local safety personnel.
2. Access to fire extinguishers or other fire protection equipment must not be blocked or restricted.
3. Employees shall not use fire extinguishers or other fire protection equipment unless they are trained and designated to do so.

Additional Fire Protection Practices during Operations & Maintenance

The following will be implemented for the Project for fire management measures:

- The Project will maintain (i.e. mow) the onsite vegetation to (1) ensure the accessory structures and main electrical equipment have defensible space around them and (2) mitigate the overall Project fuel loading.
- There will be a “Knox Box”-type access system at the various entry gates to allow quick fire department access.

Responsibility

During the construction phase of the Project, fire-related concerns should be reported to the supervisor on site. Overseeing the supervisor will be Darnell Everett, Vice President of Construction, who can be reached at deverertt@juwiamerica.com. The current principal contact for Project operations and maintenance is Matt Cuellar, who can be reached at (720) 838-2298 or mcuellar@juwiamerica.com.