Appendix M

Fire Prevention Safety Plan

Fire Prevention Safety Plan

Grace Solar Energy Center

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AED	Automated External Defibrillator
AMSL	Above mean sea level
BESS	Battery Energy Storage System
BLM	Bureau of Land Management
CBC	California Building Code
CEQA	California Environmental Quality Act
CO2	Carbon Dioxide
COD	Commercial Operation Date
CUP	Conditional Use Permit
DFA	Development Focus Area
DRECP	Desert Renewable Energy Conservation Plan
EIS	Environmental Impact Statement
FPSP	Fire Prevention Safety Plan
FSC	Fire Safety Coordinator
IC	Incident Commander
kV	Kilovolt
MW	Megawatt
NEPA	National Environmental Policy Act
NFPA	National Fire Protection Association
NH	National Hose
NWS	National Weather Service
O&M	Operation & Maintenance
PPE	Personal Protective Equipment
Project	Grace Solar Energy Center
PUP	Public Use Permit
PV	Photovoltaic
RCFD	Riverside County Fire Department
RFW	Red Flag Warning
ROD	Record of Decision
ROW	Right-of-Way
SCADA	Supervisory Control and Data Acquisition
SCE	Southern California Edison
SSO	Site Safety Officer
TBD	To Be Determined
WUI	Wildland-Urban Interface

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Definitions

Activity Risk: Activity risks include those actions that present a risk of igniting a wildfire.

Site Safety Officer (SSO): The SSO serves as a liaison to the emergency service agencies and all contractors or inspectors on the jobsite for the utilities on emergency incidents and construction-related activities. The Fire Safety Coordinator has the authority to stop any Project work that appears to pose a particular fire risk or hazard.

Fire Season (FS): Fire season is no longer officially designated by the wildland fire agencies. Southern California is considered to be in FS on a yearlong basis. CALFIRE adjusts their staffing patterns as fire conditions moderate or escalate and this can be used as an indicator of potential fire activity.

Incident Commander (IC): The Grace Solar Fire Safety Coordinator will be the single point of contact for all utility resources (people and equipment) on an emergency incident. This person will interface with the Incident Commander, as necessary.

Red Flag Warning (RFW): A Red Flag Warning is issued for a stated period of time by the National Weather Service using pre-determined criteria to identify particularly critical wildfire danger in a particular geographic area. All ground disturbance and activities with the potential to start a fire shall cease during RFWs.

1 Introduction

This Fire Prevention and Safety Plan (FPSP) will detail practices designed to address potential impacts from construction and operation of the Grace Solar Energy Center (Project) in Riverside County, California. This plan provides guidance to construction and field personnel on measures identified by Grace Orchard Solar II, LLC (Applicant) to mitigate fire risks during construction, operations, and decommissioning activities associated with the Project. It will be the responsibility of the Applicant and its Project contractors to comply with measures identified in this plan.

The BLM would be responsible for responding to wildfires located within their Direct Protection Areas (DPA) in conjunction with the Riverside County Fire Department (RCFD) and California Department of Forestry and Fire Protection (CAL-FIRE). A DPA is an area for which a particular fire protection organization has the primary responsibility for attacking an uncontrolled fire and for directing the suppression action. The Project's transmission lines are located on either privately-owned land or within a Bureau of Land Management (BLM) Development Focus Area (DFA). Because solar arrays are located on private lands, RCFD would be responsible for responding to wildfires within the Project's solar energy generation facility.

Riverside County will be the California Environmental Quality Act (CEQA) lead agency for the Project. The BLM will be the National Environmental Policy Act (NEPA) lead agency for the Project's transmission line located on BLM land under Phase 2. This Fire Prevention and Safety Plan has been prepared consistent with CEQA and NEPA standards in order to support preparation of Project's environmental documents and the discretionary land use decisions that will be undertaken by the Riverside County Board of Supervisors and the BLM.

The project proponent will also prepare an emergency response plan (ERP), which will be developed in accordance with OSHA standards and other applicable federal, state, and local occupational safety and health laws, regulations and standards.

1.1 Project Description

The Applicant proposes to entitle, construct, operate, and maintain the Project, located in Riverside County, California. The Project would aggregate approximately 3,705 acres, including approximately 3,310 acres of private land and 395 acres of land administered by the U.S. Department of Interior, BLM, Palm Springs-South Coast Field Office. The Project would include up to 500-megawatts (MW) of photovoltaic solar generation and battery storage with a capacity of up to 500 MW (Figure 1, Project Location). The Project would also include County Road improvements within the Project Boundary.

The Project would also include transmission lines, collector substation, operations and maintenance (O&M) building, access roads, and collection lines. The Project would include two phases, including Phase 1 – Solar and Western Power Administration (WAPA) Tie-In and Phase 2 – Battery Energy Storage System (BESS) and Arlington Collocation. Under Phase 1, the Project would construct the solar facility, ancillary facilities, and an approximately 3.5-mile transmission line to interconnect with the existing Parker – Blythe 161 kV transmission line owned by WAPA on private land. The Phase 1 transmission line would interconnect through a tie-in with the existing Parker – Blythe 161 kV transmission line owned by WAPA using a new 161 kV switchyard. The Phase 1 solar facility and ancillary facilities could also utilize the Phase 2 transmission line. Under Phase 2, the Project would construct a

BESS and ancillary facilities on private land and an approximately 10.5-mile transmission line to interconnect with the Southern California Edison (SCE) 230-kV Colorado River Substation located on BLM-administered land. The majority of the Phase 2 transmission line (8.6 miles) would utilize the existing open-circuit of the double-circuit Arlington transmission line; and therefore, would be located within an existing right-of-way (ROW). The 395-acre area on BLM-administered lands would be limited to the transmission line in Phase 2.

The entire solar facility footprint and BESS footprint would be enclosed by fences. All areas within the perimeter security fence would be mitigated for permanent habitat loss in accordance with County of Riverside requirements, as applicable. Security would be maintained as required by the engineering, procurement, and construction contractor or a suitable subcontractor to maintain public safety.

The Applicant is pursuing a Conditional Use Permit (CUP), Public Use Permit (PUP), and a Development Agreement (DA) from Riverside County for the private lands associated with the Project and a Right-of-Way (ROW) grant from the BLM for the BLM-administered lands associated with the Project. As such, Riverside County will serve as the CEQA lead agency and the BLM as the NEPA lead agency.

The Project is intended to be constructed in a single duration; however, it may be developed in multiple stages depending on pending power purchase agreements. The total construction duration is planned to take approximately 28 months from notice to proceed to final connection and commissioning. If the project is constructed in multiple stages, total construction length would be extended. Construction itself is separated into five construction phases. The first phase would consist of site preparation, fencing, and ingress/egress. The second phase would consist of civil improvements such as grading, roads, and earthwork. The third phase would consist of PV panel and BESS construction. The fourth phase would consist of testing and commissioning. The fifth phase is deconstruction, but that is not factored into the construction timeline. Construction is anticipated to commence in June of 2026 and the Commercial Operation Date (COD) is anticipated to occur in September of 2028. The operational life of the Project is anticipated to be 40 years.

1.2 Project Location and Access

The Project is located on private lands in Riverside County and federal lands administered by BLM, aggregating 3,705 acres. Approximately 3,310 acres of the Grace Solar Energy Center is located on private lands within the County of Riverside, while 395 acres within the Project Boundary are located on BLM Lands / Desert Renewable Energy Conservation Plan (DRECP) Development Focus Areas (Figure 1. Project Location). The Project site is located approximately 2 miles north of Interstate 10, adjacent, on the west side, to the city limits of Blythe, in unincorporated Riverside County, California. The Project is also located adjacent to existing solar facilities on private and public lands. BLM lands are immediately adjacent to the Project and along the Phase 2 transmission line (Figure 2, Project Location and Parcels). Surrounding land uses include open space rural, agricultural, and public facility uses. Existing land uses onsite consist of fallowed agricultural lands and vacant/undeveloped lands.

The entire perimeter of the Project boundary is not bound by existing streets. 5th Avenue runs across the northern border of the Project, with Rannels Boulevard, 7th Avenue, and Megins Avenue along the west boundary of the Project. Within the Project boundary exists a rectangle of non-Project land. Dave Street surrounds the west side of this rectangle, while 7th Avenue and 9th Avenue respectively lie north and south of this rectangle. Roads that exist within the Project Boundary include Buck Boulevard and Stephenson Boulevard. Primary Access into the site would be through Buck Boulevard, while secondary access be along Stephenson Boulevard under Phase 1 and two points of Dracker Road under Phase 2: one access point would on the western-most portion of the Project Boundary

located on BLM lands, just south of the southwestern area of the Blythe Solar Power Project, while the second access point would be on BLM lands just north of Interstate 10 (Figure 3, Site Layout).

1.2 Topography and Vegetation

The topography of the Project site is relatively level, with elevations ranging from approximately 310 feet above mean sea level (amsl) in the southeastern end of the site to 430 feet amsl near the northwestern end of the site. Notable slopes of 6-15% and greater than 15% are located on the eastern portion of the Project Boundary, but solar arrays are not planned to be built in those sloped areas.

Vegetation communities at the Project site primarily consist of fallow agriculture, creosote bush scrub, and desert pavement. There is mesquite habitat bordered by large trees planted along the edge of private parcels southeast of the Project site. Tree species, such as *Olneya tesota* (Ironwood), were also identified onsite, primarily near the washes and along the Phase 2 transmission line.

The solar facility is situated within fallowed agriculture land and vacant/undeveloped lands. Land uses in the vicinity of the Project site include transportation (I-10 and Blythe Airport), agricultural, renewable energy (both existing and proposed), energy transmission lines, historical military operations, and recreational facilities. There is privately-owned lemon orchard located within the center of the Project boundary. There is one residence adjacent to the northern Project boundary (approximately 175 feet from boundary) and rural residences are located about 4,400 feet to the east along 10th Avenue and about 5,500 feet to the east along Arrowhead Boulevard. The community of Mesa Verde is approximately 1.5 miles east of the Phase 2 transmission line, immediately south of I-10, Palo Verde College is located about a mile to the east, and the City of Blythe is located approximately 4.5 miles southeast.

The existing Blythe Solar Energy Project borders the Project on the northwest corner and Blythe Mesa borders the Project to the south, as illustrated in Figure 2. The existing Arlington Solar Energy Project and McCoy Solar Project are located north of the Project and the proposed Desert Quartzite project would be located south of the Phase 2 transmission line. The Project uses the open circuit of the existing double-circuit Arlington transmission line and ties into the existing SCE Colorado River Substation.

2 Project Specific Risk Summary

2.1 Fire Risk

The estimated risk associated with the Project site is considered to be low to moderate during construction and decommissioning and low during operation The risk of fires associated with solar photovoltaic (PV) facilities is low because of newer technology techniques and improved fire prevention techniques and maintenance including vegetation management. The active construction phase results in higher potential for ignition because hot work, vegetation clearing, and other activities that may result in flame or heat sources to ignite vegetation, especially if non-native grasses have established and cured. However, with proper clearance and maintenance of vegetation, this risk could be mitigated.

Key actions to reduce the risk of fire for the Grace Solar Energy Center include having clear safety standards for all components of the Project such as water, fire protection systems, emergency and notification procedures, training, and vegetation management. During construction and operation, this would specifically entail proper vegetation maintenance according to appropriate fire codes and ensuring proper use of all equipment including but not limited to chainsaws, welders, or vehicles around or near any vegetation. This would also entail emergency and evacuation protocols including notification procedures with clear, comprehensive, and consistent training of staff to execute those protocols. Additional measures would also include clear communication with relevant stakeholders including BLM and RCFD.

Fire risks must be assessed based upon the potential frequency (probability of an incident occurring) and consequence (potential damage should an event occur). Among the listed potential causes of fire incidents involving solar and BESS facilities that are relevant for this study are:

- Explosion/Arcs, arc flashing, electrical shorts, sparking, motor or other machinery fire, wiring and harnessing fire, overheated junction boxes, rodents chewing on wires and causing arcing, etc.
- Collapse of supporting structure causing electrical shorts and fire.
- Overgrown vegetative fuel under and around the array.
- Equipment and supplies stored under arrays for shading.
- Trash cans, smoking areas, and other combustible storage under arrays.
- Fire in an inverter.
- Short circuit and fire of components in or on a panel.
- Lubricating and control oil fire.
- Fire from BESS caused by battery damage.
- Fire from BESS due to failure of the battery management system.
- Switchgear and cable fire.
- Backup generators for the O&M building and the onsite substation

2.1.1 Construction and Decommissioning Phase Risks

The Project's fire risks are associated with the following:

- **Earth-moving equipment** – create sparks, heat sources, fuel or hydraulic leaks, etc.
- **Chainsaws** – may result in vegetation ignition from overheating, spark, fuel leak, etc.
- **Vehicles** – heated exhausts/catalytic converters in contact with vegetation may result in ignition.
- **Welders** – open heat source may result in metallic spark coming into contact with vegetation
- **Wood chippers** – include flammable fuels and hydraulic fluid that may overheat and spray onto vegetation with a hose failure.
- **Temporary vegetation piles** – large piles that are allowed to dry and are left on-site may result in combustion and potential for embers landing in adjacent vegetation.
- **Grinders** – sparks from grinding metal components may land on a receptive fuel bed.
- **Torches** – heat source, open flame, and resulting heated metal shards may come in contact with vegetation.
- **Dynamite/blasting** – if necessary, blasting may cause vegetation ignition from open flame, excessive heat or contact of heated material on dry vegetation.
- **Other human-caused accidental ignitions** – ignitions related to discarded cigarettes, matches, temporary electrical connections, inappropriately placed generators, poor maintenance of equipment, and others.

2.1.2 Operation and Maintenance Phase Risks

Ignition risks are anticipated to drop considerably following the Project's active construction phase. Operation and maintenance activities occur within a defined Project footprint where the adjacent fuels have been removed or converted to fuel modification-consistent vegetation.

- **Transformers** – are subject to occasional failure, sending sparks, hot materials out in any direction; fire in a transformer may result in ignition of the oil therein.
- **Capacitors** – may overheat, fail, and cause a spark, which may result in combustion of flammable materials, such as vegetation, if nearby.
- **Electrical transmission lines** – energized lines may arch from adjacent vegetation (trees) or if tower/pole fails, may arch on the ground, causing ignition of vegetation.
- **Substations** – include various electrical components that may explode, fail, or ignite and include oil-cooled transformers.
- **Vehicles** – heated exhausts in contact with vegetation may result in ignition.
- **Hot works equipment** – all small hand tools either gas or electric powered that may result in sparks, flames, or excessive heat may result in vegetation ignition.
- **Wildlife** coming into contact with solar panels, especially avian species.
- **BESS** - excess heat caused by lithium-ion battery defects or damage that could start fires or explosions.
- **BESS** – failure of the battery management systems.

2.1.3 Power Line Risks

Electrical transmission and collection lines such as those proposed for this Project and associated structures can start fires in a number of ways, including the following:

- Uncleared vegetation, especially trees, coming into contact with conductors.
- Sparks (from exploding hardware such as transformers and capacitors) coming into contact with vegetation.
- Wind-blown debris coming into contact with hardware such as transformers and conductors.
- Conductor-to-conductor contact.
- Aircraft or helicopter, or attached features such as fire-fighting water buckets, coming into contact with power line hardware and support structures.

2.2 Grace Solar Energy Project Risk Rating

The estimated risk associated with the Project site is considered to be low to moderate during construction and decommissioning and low during operation. The risk of fires associated with solar facilities is low. The active construction phase results could result in higher potential for fires. Hot works, vegetation clearing, and other activities that may result in flame or heat sources can ignite vegetation, especially if non-native grasses have established and cured. However, with proper vegetation clearance and maintenance during construction and O&M of the project, this risk is minimized. Although there will be a potential for structural/equipment fires and wildfires, the risk is considered manageable as indicated by the low historic fire occurrence in existing solar facilities including by not limited to the nearby Blythe, McCoy, Arlington Solar Energy Center, Blythe Airport Solar, Blythe Mesa Solar, Blythe 21 Solar, Desert Quartzite Solar, and Crimson Solar Projects.

2.3 Risk Reduction Measures

The following measures will be employed, as appropriate, during each phase of the Project (construction, operation and maintenance and decommissioning) to reduce the risk of ignitions. These measures will be enforced through the Site Safety Officer (SSO) and ongoing worker safety training.

- Fire prevention rules shall be posted on the Project bulletin board at the contractor's field office as defined in Section 8.
- This shall include all contractors and subcontractors if more than one.
- All internal combustion engines used at the Project site shall be equipped with spark arrestors that are in good working order.
- Once initial roads have been cut and initial fencing completed, light trucks and cars shall be used only on roads where the roadway is cleared of vegetation. Mufflers on all cars and light trucks shall be maintained in good working order.
- During construction activities, the Project will be equipped with at least one and up to three water trucks each of 4,000-gallon capacity. Each truck will be equipped with 50 feet of 1 /4" fast response hose with fog nozzles. Any hose size greater than 1 ½" shall use National Hose (NH) couplings.
- All pickup trucks will be equipped with first-aid kits, fire extinguishers and shovels.

- Equipment parking areas and small stationary engine sites shall be cleared of all extraneous flammable materials.
- The Applicant shall make an effort to restrict use of chainsaws, chippers, vegetation masticators, grinders, drill rigs, tractors, torches, and explosives to outside of red flag warning periods. When the above tools are used, water trucks equipped with hoses, fire rakes and axes shall be easily accessible to personnel.
- A fire watch (person responsible for monitoring for ignitions) will be provided during hot work and shall remain at the site for up to one hour following completion of the hot work activities.
- Smoking shall be prohibited in wildland areas and within 50 feet of combustible materials storage and shall be limited to paved areas or designated areas cleared of all vegetation.
- The construction site shall be equipped with fire extinguishers and firefighting equipment sufficient to extinguish small fires.
- All construction workers and maintenance workers visiting the Project to perform maintenance activities shall receive training on the proper use of firefighting equipment and procedures to be followed in the event of a fire.
- All on-site employees shall participate in annual fire prevention and response training exercises with the RCFD if required and provided locally by RCFD.
- A SSO will perform daily patrols of the site during RFW equipped with a portable fire extinguisher and communications equipment. The Applicant shall notify the BLM and County of the name and contact information of the current SSO in the event of any change.
- Remote monitoring of all major electrical equipment (transformers and inverters) will screen for unusual operating conditions. Higher than normal temperatures, for example, can be compared with other operational factors to indicate the potential for overheating which, under certain conditions, could precipitate a fire.
- Fires ignited on site shall be immediately reported to the RCFD.
- The engineering, procurement, and construction contracts for the Project shall clearly state the fire safety requirements that are the responsibility of any person who enters the site, as described in this Fire Prevention and Safety Plan.
- Water system will include on site water storage, RCFD approved connections and RCFD approved fire flow pressures and durations.
- Water tank(s) will be located on site and will be sized to comply with RCFD requirements.
- A temporary water storage tank shall be maintained onsite during construction and will be made available for firefighting purposes.
- Vegetation on-site, under trackers, adjacent internal roads, and directly adjacent the perimeter fence shall be maintained in a low fuel, ignition resistant condition and shall be trimmed/mowed as needed or controlled via herbicide acceptable to BLM and/or the County, as applicable.

2.3.1 Battery Energy Storage System Risk Reduction

Potential hazards associated with battery energy storage systems are primarily associated with the possibility of thermal runaway (similar to overheating) occurring from a malfunctioning or damaged battery. Newer battery technologies have minimized the occurrence of thermal runaway through a system of protections including internal cell monitoring and partitioning; use of nonflammable chemicals; container design and features; ventilation, and air-conditioning systems; and inert gas fire protection systems.

The Project's battery energy storage system will include approximately 705 self-contained battery containers, with individual dimensions estimated to be 20 feet long by 9 feet wide by max height of 20 feet (these dimensions can vary by manufacturer). Foundations will be constructed with either steel piles, concrete grade beams, concrete piers, or concrete slabs, with individual dimensions also estimated to be 20 feet by 9 feet. Inverters would convert the DC electric input into grid-quality AC output and would be located within an enclosure. The inverters would be located throughout the solar field and connected to the Project onsite substation via the collection system.

A battery supplier has not been selected at this time due to changing markets; however, past suppliers have included CATL, LG Chem, Samsung, Tesla, and Lishen. Inverter suppliers would be selected among renowned international players like Power Electronics, GE, ABB, Parker Hannifin, S&C Electric, Eaton, Princeton Power, DynaPower, and Ideal Power. The final supplier(s) would be selected prior to Project construction and would be subject to an industry-standard prequalification process.

The proposed Project will use battery storage systems that are National Fire Protection Association (NFPA) 855 Code compliant, and UL certified and that include built-in failsafe and cooling systems designed to prevent thermal runaway and the spread of fire.

Under normal operations, BESS facilities do not contain, store, or generate hazardous materials in quantities that would represent a risk to off-site receptors. In addition, the Project's preventative measures and fire and safety systems, as described below, make an accident condition very rare. Nevertheless, because BESS facilities do store energy, a battery thermal runaway can occur if a cell, or area within a cell, reaches elevated temperatures due to thermal failure, mechanical failure or internal/external short circuiting.

All stationary battery storage facilities in California are required to comply with Chapter 12 (Energy Systems) and particularly Section 1206 (Electrical Energy Storage Systems) of the California Fire Code, which has adopted internationally and federally accepted NFPA 855 standards for the design, construction, installation, commissioning, operation and maintenance of stationary energy storage systems. In addition to compliance with the 2022 California Fire Code, the Project will also comply with all other local, state, and federal safety standards and regulations, including those of the Riverside County Fire Department.

Pursuant to the 2022 California Fire Code, all battery manufacturers must prove that a failed battery cell inside and enclosure will not cause a fire outside the system. The Project must meet the industry standards for adequate separations, cascading protections, and protection systems to limit failure to a single battery cell. All BESS must use an Energy Management System for 24/7 monitoring, management, and balancing of cell voltages, currents and temperatures in order to ensure every cell remains within its safe operating parameters. The system must transmit an alarm signal if potentially hazardous temperatures or other conditions such as short circuits, over voltage or under voltage, are detected. This system is capable of controlling and isolating individual cells from the rest of the system both remotely and manually.

The Project will utilize pre-engineered battery storage systems equipped with integrated operational management systems, fire, and safety systems, such as HVAC, ventilation, gas, heat and smoke detection and alarms, and fire extinguishing and protection systems. The 2022 California Fire Code contains safety standards for the system's construction (e.g., frame and enclosure, including mounting, supporting materials, barriers and more); the insulation, wiring, switches, transformers, spacing and grounding; safety standards for performance, such as tests for temperature, volatility, impact, overload of switches, and an impact drop test; and standards for manufacturing, ratings, markings, and instruction manuals. In addition to the many individual standards referenced, a Failure Mode and Effects Analysis (FMEA) must be performed for each system and requires a test to ensure safe compatibility of the system's parts.

The proposed batteries and containers will also include the following important monitoring and safety components:

- Modular battery racks designed for ease of maintenance
- Integrated heat and fire detection and protection system
- Integrated air conditioning system
- Integrated battery management system

The heat and fire detection system will be linked to an automatic inert gas protection system within each container. The containers would also have a basic interior sprinkler system with several sprinkler heads for coverage and an external dry standpipe for fire fighters to connect and pump water.

Spent batteries are considered to be a hazardous solid. Disposal or spent batteries would be recycled or disposed of offsite in accordance with 40 CFR 273.2 and 40 CFR 266. Instructions would be reiterated in a Construction Spill Prevention, Control, and Countermeasures Plan and Waste and Hazardous Materials Management Plan, which would be developed and implemented in accordance with all federal and state requirements prior to the start of Project construction.

2.3.2 Vegetation Risk Reduction

Project site preparation would minimize removal of vegetation and disturbance of the existing soil surface where feasible. Vegetation on the site would be modified only where necessary through a combination of drive and crush, mowing and herbicide application, where needed. Areas that are mowed would be maintained as necessary. The lemon trees within the existing orchard would be removed and chipped during overall site clearing and grubbing. Wood chips from the lemon tree clearing activity would either be hauled offsite or buried onsite. Vegetation would be removed where gravel roads would be constructed, where fill would be placed from grading operations, at the substation, BESS, and laydown areas, and where transmission pole and tracker foundations would be installed (if necessary). At locations where transmission pole and tracker foundations would be installed, minor cuts may be required where the foundations would be driven. Minor earth work would also occur to install aggregate base access roads and transmission line maintenance roads. The surface of the roads would be at grade to allow any water to sheet flow across the site as it currently does. Throughout the remainder of the developed area on the Project site, the vegetation root mass would generally be left in place to help maintain existing drainage patterns on a micro level, and to assist in erosion control.

During construction of the solar energy storage facility, it is expected that most of the vegetation would be cut, trimmed, or flattened as necessary, but otherwise undisturbed so that reestablishment is possible. Disturbances to vegetation and soils would be carefully planned and minimized during construction. The post-construction ROW

would be restored in accordance with all County and BLM requirements. All practical means would be made to restore the land to its original natural contours. Vegetation would be removed only where the Applicant or their EPC determines necessary in the solar array for localized ground contouring and for construction and maintenance of access roads, the O&M building, equipment enclosures and pads, storm security improvements, the site substation, and where it could interfere with facility operation. In other areas, vegetation would be trimmed or knocked down as needed for construction safety and allowed to re-grow to a height that would not interfere with facility operations or create a fire risk. Areas that were mowed or trimmed during construction would be maintained at a height of approximately 12 inches, which would be trimmed once or twice a year, as necessary. Equipment includes a commercial-sized raised deck mower, or similar. A bush hog or similar typically is not needed but could be used in limited areas if vegetation becomes thick. Temporary disturbed areas within the perimeter security fence for the solar facility and BESS facility would be revegetated for erosion control purposes.

Vegetation and weed management plans would be prepared for BLM review and approval prior to the start of construction. A Site Restoration and Revegetation Plan (see Appendix B of Appendix D, Decommissioning and Reclamation Plan) and an Integrated Weed Management Plan would be finalized prior to receiving a notice to proceed from BLM. The plans would include approved mitigations and best management practices. Infestations of non-native and invasive species would be treated in accordance with the Integrated Weed Management Plan. If needed, only BLM-approved herbicides would be used within the Project area. Any use of specific herbicides would be outlined in the Integrated Weed Management Plan.

2.4 Daily Fire Prevention Measures

To limit the risk of fires, all site staff, employees, and contractors shall take the following precautions:

- Fire safety shall be a component of daily tailgate meetings. Foremen will remind employees of fire safety, prevention, and emergency protocols daily.
- No smoking will be allowed on site except in designated safe smoking areas which include cleared area with no combustible vegetation or materials and approved butt receptacles (noncombustible containment of cigarette butts). Smoking inside closed vehicles at the site may be allowed in designated areas away from vegetation, at the discretion of the SSO.
- Combustible materials will be stored in areas away from native vegetation. Whenever combustibles are being stored in the open air, the SSO shall be informed of the situation.
- Maintain all evacuation routes free of obstructions. Coordinate unavoidable evacuation route blockages such that a secondary route is identified and available.
- Dispose of combustible waste in accordance with all applicable laws and regulations.
- Use and store flammable materials in areas away from ignition sources.
- Properly store chemicals such that incompatible (i.e., chemically reactive) substances are separated appropriately.

2.4.1 Fire Prevention/Protection System Maintenance

The SSO (or trained specialist, when necessary) will ensure that fire protection and related equipment is maintained according to manufacturers' specifications. NFPA guidelines shall be implemented for specific equipment.

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

- portable fire extinguishers
- fire alarm systems
- water trucks and associated equipment
- emergency backup generators/systems and the equipment they support.

2.5 Hot Work

These requirements are primarily from the 2022 California Fire Code (CFC) Chapter 35, "Welding and other Hot Work," and NFPA 51-B, "Fire Prevention During Welding, Cutting and other Hot Work". Hot Work is defined in the CFC as operations involving cutting, welding, thermit welding, brazing, soldering, grinding, thermal spraying, thawing pipe, or other similar operations. Hot Work areas are defined as the areas exposed to sparks, hot slag, radiant heat, or convective heat because of the Hot Work.

A Hot Work Permit shall be obtained from the SSO, following guidelines from RCFD, for all Hot Work regardless of location. The SSO will require all Hot Work to be done per requirements in NFPA 51-B and the Fire Code Chapter 35.

Hot Work shall only be done in fire safe areas designated by the SSO and shall comply with the following:

- All personnel involved in Hot Work shall be trained in safe operation of the equipment by the SSO. This will include providing training at "tailgate safety meetings". They shall also be made aware of the risks involved and emergency procedures, such as how to notify the SSO of an issue and who is responsible to call 911.
- Signage required in areas where workers may enter indicating "Caution; Hot Work in progress; Stay Clear."
- Hot Work shall not be done on any containers which contain or have contained flammable liquids, gases or solids until containers have been thoroughly cleaned, purged, or inerted.
- A fire extinguisher with a minimum rating of 3-A-40 BC, a 5-gallon backpack pump fire extinguisher, and a 46-inch round point shovel, shall be readily accessible within 25 feet of Hot Work area.
- The SSO shall inspect the Hot Work area daily.
- Gas welding and cutting shall comply with 2022 California Fire Code (CFC) Section 3505.
- Electric arc hot work shall comply with CFC 3505.
- Piping manifolds and hose systems for fuel gases and oxygen shall comply with CFC Section 3509.

  Cylinder use and storage shall comply with CFC Chapter 53, "Compressed Gases."
- Personal Protective Equipment (PPE) shall be selected to minimize the potential for ignition, burning, trapping hot sparks, and electric shock.
- As considered necessary by the FSC, post work fire monitoring may be required for up to one hour.
- Any ignitions will be immediately extinguished (as possible) by site personnel and the RCFD will be notified of the incident.
- The FSC shall have the responsibility to assure safe Hot Work operations and shall have the authority to modify Hot Work activities associated with construction and/or maintenance activities, and to exceed the requirements in NFPA 51-B and the Fire Code, to the degree necessary to prevent fire ignition. Workers must be trained on the Hot Work Information and criteria in this plan.

3 Fire Prevention and Safety Plan Goals

The primary goals of this FPSP are to address the identified ignition sources and risks so that the Grace Solar Energy Center, from the construction phase to the final decommissioning phase, has clearly defined protocols and procedures for reducing fire risk and maintaining a fire safe worksite. Among the goals developed for the Grace Project site are:

- Prevent/minimize fires during construction, operation, and decommissioning.
- Provide a safe worksite for all employees, contractors, visitors and emergency personnel.
- Prevent shock to emergency responders, workers, and unauthorized trespassers.
- Prevent arcing or sparking, which could ignite vegetation on site.
- Employ materials which will not be readily ignited by airborne burning embers or exposure to off-site wildland fires or on-site equipment fires.
- Prevent or minimize dollar loss to the equipment.
- Prevent or minimize potential for a fire starting on site to spread off site.
- Provide water, appropriate fire extinguishers and access for firefighters.
- Provide adequate signage and shut off devices to stop power feed into power lines in the event of a line failure, or fire in the right-of-way.
- Provide the ability to report a fire or other emergency to the emergency dispatch center and company personnel without delay.

4 Emergency Notification Procedures

Any fire event at or near the site will trigger the emergency notification procedures identified in this section. Fire reporting is critical for tracking where, when, how, and why fire ignitions occur.

4.1 First Call = 9-1-1

Reporting Fires and other emergencies: The first call should be to 9-1-1 so that appropriate apparatus can be dispatched.

The personnel in Table 1 are the primary site contacts to be notified during a fire emergency.

Table 1. Emergency Notification Primary Contacts

Name	Position	Telephone Number
TBD	Site Safety Officer	TBD
TBD	Site Manager	TBD
TBD	Project Manager	TBD
TBD	Project Engineer	TBD
TBD	Construction Supervisor	TBD

The first call should be to 911 so that emergency responders can be dispatched. Travel times to the site require notification of 911 as early as possible after the fire or other emergency has been observed.

Emergency related contacts near the site include:

Emergency Service	Contact	Telephone Number
Fire/Emergency Medical	Riverside County Fire Department	760.921.7825 (Alternate: 760.921.7822)
Ambulance	Blythe Ambulance	760.922.8460
BLM Fire	Fed Interagency Com Center	909.382.2997
Riverside County Sheriff	Blythe Office	760.921.7900
California Highway Patrol	Blythe Office	760.922.6141
Hospital	Palo Verde Hospital	760.922.4115
California OSHA – Consultation Service Area Offices	Region 6 Office	909.383.4567

To facilitate the arrival of fire services during construction, an emergency response meeting point will be established with the BLM and Riverside County Fire Department. The SSO, or designee will meet the emergency response team including the IC at the meeting point to lead them into the site. The meeting point will be selected with RCFD input.

4.2 Evacuation Procedures

During significant emergency situations at or near the Project site, the Site Manager and/or SSO, in consultation with law or fire authorities, as possible, may issue an evacuation notice. When an evacuation has been called, all site employees will gather at the designated assembly area and the SSO will account for all personnel. Once all employees are accounted for, the vehicles will safely convoy from the site to safe zones, which are generally areas off-site away from the threat. Should there still be persons within the site after the evacuation has been called, the SSO will send convened personnel off site to safe zones and the SSO and supervisors will perform a sweep of the facility to locate persons and reconvene at the assembly area. Once all personnel are accounted for, they will exit the site. The Primary Designated Assembly Area is designated as the lay down area adjacent to the main job-site trailer.

Should a structure or wild land fire (or other emergency) occur that threatens the primary assembly area; other locations may be designated as secondary assembly areas by the SSO or supervisors, as dictated by the situation. The SSO and/or Site Supervisors should be prepared to be available to the Fire Safety Coordinator throughout the Incident to facilitate information exchange.

4.2.1 Evacuation Routes

Depending on the type and severity of the emergency, along with weather and/or localized site conditions, roadways designated on Figure 3 will be used for evacuating the area. The south side of the Project site is close by Interstate 10. Primary construction access would be from the main access road via Buck Boulevard. A secondary access into the site would be along Stephenson Boulevard under Phase 1 and two points of Dracker Road under Phase 2: one access point would on the western-most portion of the Project Boundary located on BLM lands, just south of the southwestern area of the Blythe Solar Power Project, while the second access point would be on BLM lands just north of Interstate 10 (Figure 3, Site Layout).

The SSO and Site Managers are primarily responsible for evacuations. They will employ procedures to determine the emergency, talk with fire officials, as possible, and declare the emergency status. Foreman level supervisors shall assist in accounting for personnel. The SSO or his/her designee, shall be assigned to meet and guide firefighting resources to the scene.

5 Grace Solar Energy Center Roles and Responsibilities

All employees should know how to prevent and respond to fires and are responsible for adhering to company policy regarding fire emergencies. In particular, the following sections detail general responsibilities, by position.

5.1 Project Owner/Management

The Project owners/management are responsible for funding appropriate studies to determine overall fire risk and then implementing necessary measures to reduce the risk and comply with federal, state, and local fire safety/protection policies. Additionally, Owners/Management are responsible for making necessary training and equipment available to provide a safe working environment for employees and contractors.

5.2 Site Safety Office

The SSO will manage the Fire Prevention and Safety Plan for the Project and shall maintain all records pertaining to the plan. Among the other responsibilities of the SSO are:

- Understanding the Fire Prevention and Safety Plan and its mandates for training, fire prevention, fire protection, and evacuation.
- Understanding the fire risk associated with the site and with activities that will occur on site.
- Developing and administering the fire prevention and safety training program.
- Ensuring that fire control equipment and systems are properly maintained and in good working condition.
- Monitoring combustibles on the site and managing where they are stored.
- Conducting fire safety surveys and making recommendations to the Site Manager.
- Posting fire rules on the Project bulletin board at the contractor's field office and areas visible to employees including in the operations and maintenance building.
- Stopping Project work activities that pose a fire hazard or are not in compliance with this Fire Prevention and Safety Plan
- Reporting all fires ignited on the site, whether structural, vegetation, electrical, or other to BLM FIRE and the Riverside County Fire Department.
- Updating the FPSP annually and providing updated copies to the BLM and RCFD.

5.3 Supervisors

Supervisors are responsible for:

- Ensuring that employees receive appropriate fire safety training.
- Notifying the SSO when changes in operation increase the risk of fire.
- Enforcing fire prevention and protection policies.

- Accounting for employees/contractors in the case of an evacuation.
- Performing site sweeps to round up staff in the case of an evacuation.
- Facilitating fire agency access to the site.
- Cooperating with the fire agencies/Incident Commander during and following fires.
- Identifying unsafe work practices that may lead to fire ignitions and correcting those practices in coordination with the SSO and/or FSC, as appropriate.

5.4 Employees/Contractors

All employees and contractors shall:

- Complete all required training before working on site without supervision.
- Conduct operations safely to limit the risk of fire.
- Report potential fire hazards to their supervisors.
- Follow fire emergency procedures.
- Understand the emergency evacuation protocols.

6 Grace Solar Energy Center Minimum Safety Standards

1. **Roads: Fire Apparatus Access Roads (Fire):** Fire access roads would be provided according to RCFD requirements which typically include an all-weather surface and ability to support the imposed loads of fire apparatus. At minimum, fire access roads should be provided around the perimeter of the property and within 150 feet of any on-site, habitable structures (O&M buildings, etc.). These roads shall be no less than 20 feet wide with a grade to not exceed 15%.
    a. **Service Roads:** Graded hard-packed service roads for cleaning and maintaining panels. Service roads will be capable of supporting typical maintenance vehicles and some types of fire apparatus. Service roads would be clearly marked to indicate that they will not support imposed loads of 75,000 pounds, as appropriate.
    b. **Secondary Access:** Secondary access is designed to enable responding fire engine access and citizen egress during an emergency. At least one additional fire access road would be provided to the site, if deemed necessary by a fire official in accordance with CFC Section 503.1.2 and Riverside County Fire Department Technical Policy #TP 15-002.
    c. **Vertical clearance:** Minimum vertical clearance of 13 feet 6 inches shall be provided throughout the roadway unless the fire agency determines it is not required.
    d. **Surface:** All internal fire access road surfaces will be considered "all-weather" and capable of supporting the imposed load of responding firefighting and emergency apparatus (75,000 pound minimum).
    e. **Gates/Fences:** The facility will be completely fenced with a chain link and barbed wire fence. Fences: shall not limit access to fire roads, fire hydrants, or fire protection systems; such limitations shall be mitigated with gates to allow immediate access. Gates shall be no less width than 12 feet, to facilitate the use of firefighting bulldozers. Knox padlocks will be provided on all gates.
    f. **Identification:** Identification of roads and structures will comply with California Fire Code requirements. Below surface pipelines, electrical and communications lines shall be "signed" at an interval appropriate to alert firefighting bulldozer and off-road fire engine operations to advise firefighters of depth and location. Appropriate signage to be reviewed with Riverside County prior to installing.

       Additionally, a site layout map at the Project entrance will be provided that clearly indicates inverter and electrical grid layout, panel "safe" mode switch location and entire site de-energizing disconnect switch identification and location
    g. **Water:** Typical water usage will include panel washing, dust suppression (soil binding agent road applications), and O&M building personnel usage. On-site water tank(s) shall comply with NFPA 22, Private Fire Protection Water Tanks. The water capacity of each tank shall be compliant with Riverside County Fire Department requirements.
2. **Ignition-Resistant Construction and Fire Protection Systems:** Operations & Maintenance Buildings: On-site structures such as Operations and Maintenance Buildings or other buildings that will include regular human inhabitance along with inverter structures, water tanks, and substation control rooms will be of non-combustible construction or will comply with the ignition-resistive construction requirements: Wildland-Urban Interface (WUI) areas of Chapter 7A of the California Building Code (CBC). In addition, ignition resistance solar panel components are recommended, and include:

a. Wiring, harnesses, and junction boxes designed so as to not ignite and arc or spark thereby causing potential ignition source for vegetation.
b. Electrical wiring to be listed for outdoors/exterior and be fire retardant.
c. Insulation materials (sealants) on panels to be noncombustible.
d. Electrical motors to be of a type that is sealed and does not emit sparks.
e. Provide Arc-Flash protection.
f. Exposed electrical wiring to be in proper weather resistant conduit to help resist fire exposure, arcing and sparking, etc.
g. Waterproof electrical enclosures.
h. No plastic components or cases on panels.

3. **Substations:** Substation control rooms will be of non-combustible construction.
4. **Staff and Firefighter Training:** Staff and firefighter training shall include the following topics: firefighter training, proper labeling, firefighter familiarizing, and extreme caution during fire response. On-site staff will be trained for basic first aid and (AED) operation. Basic firefighting training will also be provided to O&M on-site staff.
5. **Remote Monitoring:** Remote monitoring of the facility and its system features should be incorporated into the facility design. For example, the supervisory control and data acquisition (SCADA) system utilized by the Project will provide notification to technical staff of system faults or potential issues.
6. **Technical Staff Contact:** Project contact information will be provided to local fire agencies/stations to assist responding firefighters during an emergency. A copy of this Fire Prevention Safety Plan will be submitted to RCFD.
7. **Fire Safety Plan Notification**: The Fire Prevention Safety Plan will be provided to RCFD's closest fire station staff, and available on scene within a Knox Box.
8. **On-Site Water:** Water tank(s) will be located at the Project site in compliance with RCFD requirements, CFC and NFPA 22.
9. **Fire extinguishers:** Fire extinguishers shall be provided throughout the O&M and storage buildings, within 75 feet of each other and where there is high risk for fire ignitions and additional parameters as directed by the RCFD. This could include but is not limited to standard dry chemical extinguishers or carbon dioxide (CO2) extinguishers. The latter could be used in lieu of dry chemical as they leave no residue. However, most fire engines do not carry CO2 extinguishers. In order for this resource to be used, they would need to be available to responding firefighters.
10. **Funded and Enforced Maintenance:** Committed on-going maintenance of all facility components to fire safe levels for the life of the Project.

7 Red Flag Warning Protocol

Red Flag Warnings are issued by the National Weather Service and indicate that conditions are such (low humidity, high winds) that wildfire ignitions and spread may be facilitated. During Red Flag Warning or Watch periods, no hot works will be performed unless consultation with the RCFD has occurred to discuss the type of hot works activity and what precautions will be provided. Other construction, operation and maintenance, and decommissioning activities may proceed during these periods under heighted awareness conditions. The SSO, will determine what activities are appropriate and which should not be conducted until the Red Flag Warning has been lifted.

In order to ensure compliance with Red Flag Warning restrictions, the National Weather Service (NWS) Web site will be monitored daily during normal conditions or 2-3 times a day during Red Flag Warnings at the Project site during construction and decommissioning:

(https://forecast.weather.gov/MapClick.php?CityName=Blythe&state=CA&site=PSR&textField1=33.6103&textField2=-114.596&e=1#.Y-_dQGnMKUk)

Upon announcement of a Red Flag Warning, red flags will be prominently displayed at the entrance gate and main office indicating to employees and contractors that restrictions are in place.

8 Fire Safety Briefings, Inspections and Training

8.1 Briefings and Inspections

The SSO will conduct routine inspections. The SSO will develop an inspection check list to document these inspections.

Prior to Project construction Project personnel will receive a presentation on the contents of this FPSP along with additional fire safety and fire prevention information provided by an informed SSO (or his/her designee) as part of their OSHA training. Supervisors/foremen will be responsible for sharing FPSP content with transient Project personnel throughout the construction of the Project. Each daily safety tailgate session should include an assessment of the day's fire related risks or hazards and the mitigation for each.

Compliance with this FPSP is mandatory. Monitoring compliance with this FPSP is everybody's responsibility. All levels of Project management have the authority to shut down any operation that presents an inappropriate amount of fire risk or hazard until it can be properly mitigated.

Violations of any of the requirements of this FPSP will be addressed immediately. Appropriate consequences for repeated or serious negligence in respect to this Plan will be dealt with accordingly. All Project-related vegetation fires, regardless of size, shall be promptly reported to the California Public Utility Commission and Bureau of Land Management to determine if appropriate mitigation measures are being taken.

8.2 Training Requirements

8.2.1 Basic Fire Safety Training

The SSO and or Site Supervisors/Foremen shall present basic fire prevention training to all site personnel with their Project onboarding, and shall maintain documentation of the training, which includes:

- This FPSP, including how it can be accessed
- Fire Management: Wildfire Prevention (43 C.F.R. 9212.2 et seq.)
- Proper response and notification in the event of a fire
- Instruction on the use of portable fire extinguishers (as determined by company policy in the Emergency Response Plan), and recognition of potential fire hazards

In addition, all construction and decommissioning personnel shall be trained about the fire hazards associated with the specific materials and processes to which they are exposed and SSO will maintain documentation of the training. Operational site employees will receive this training:

- Upon first entering the facility
- Annually during a pre-planned meeting
- When changes in work processes necessitate additional training

8.2.2 Supervisor/Foreman Fire Safety Training

Prior to Project construction and or decommissioning, all Project supervisors will receive a minimum of one hour training on Wildland Fire Prevention and Safety. This training will be provided by the SSO or their qualified designee. This training will then be shared with all construction and decommissioning personnel.

Each supervisor/foreman shall be trained to understand:

- Fire reporting
- Extinguishing small fires in order to prevent them from growing into more serious threats.
- Fire prevention
- Initial Attack Firefighting
- Identifying work activities that may result in a fire hazard.

9 Disclaimer

This is a conceptual plan, not a site-specific plan, but is intended to outline the generally accepted protocols which it is anticipated will be designed and, as appropriate, refined by RCFD at the appropriate time(s) into the final site-specific plan for Grace Solar Energy Center.

Inasmuch as fire is a dynamic and often unpredictable occurrence, it cannot be guaranteed that, despite precautionary measures, a fire will not occur or that it will not result in injury, loss of life, or damage to or loss of property. No warranties expressed or implied are made herein, notwithstanding that the goal remains to identify a suite of appropriate measures calculated, to the extent feasible under the circumstances, that would mitigate the potential for such injury or damage.

Although the RCFD may determine to recommend, or mandate, particular ameliorative measures in advance, the responsibility to address and mitigate on-site and off-site fire hazard risk during construction and operation lies with the Applicant and its Project contractors. Likewise, the RCFD may elect to develop and/or implement enforcement of vegetation management requirements.

Meetings and drills are considered beneficial to augment the preparedness of occupants, workers, and other potentially affected persons within the Project for an incident that could occur with little or no warning.

This FPSP would be updated as needed to incorporate new or changed requirements. Provisions and timing regarding updates to be made would be determined between Dudek and the Applicant or as required by the AHJ.

Limitation On Reliance Or Dependence Upon Report

Any person or entity furnished with this report and/or who reviews it agrees that the advance written consent of Dudek be sought and furnished to such person or entity prior to the review, reliance or authorization as to any matters that are the subject of the reports by any person or entity (whether through act or omission as set forth in the report), other than Dudek's direct client. In such case, obtaining Dudek's consent shall not be subject to any fee or charge (other than reasonable copy costs, where applicable).

Dudek expressly disavows, does not assume any responsibility for, nor will be liable for any claims, losses, or damages associated with any matters that are the subject of this or other reports it prepares or contributes to respecting this project, however characterized (including without limitation as sounding in tort, breach of contract, misrepresentation by act or omission, failure to adhere to applicable standards of professionalism, statutory liability, etc.), whether in law or equity, whether known or unknown, and whether actual or contingent, excepting only Dudek's direct client, as to which the limitation of liability provisions in the contract between Dudek and its client shall govern.

10 References

Bureau of Land Management (BLM). 2018. "Appendix H: Typical and Maximum Rates of Active Ingredients Approved on BLM Lands. Herbicide Formulations Used on BLM Administered Lands." Accessed January 2025. https://eplanning.blm.gov/public_projects/nepa/109682/148912/182889/Appendix_H_Herbicide_Application_Rates.pdf

CBC (California Building Code). 2022. "California Building Code 2022 (Bol 1 & 2)." Accessed January 2025. https://up.codes/viewer/california/ca-building-code-2022.

CFC (California Fire Code). 2022. "California Fire Code 2022." Accessed January 2025. https://up.codes/viewer/california/ca-fire-code-2022.

NFPA (National Fire Protection Association). n.d. "NFPA Codes & Standards." https://www.nfpa.org/codes-and-standards/all-codes-and-standards/list-of-codes-and-standards.

NFPA. 2018. "NFPA 10: Standard for Portable Fire Extinguishers". Accessed January 2025. https://dl.imenada.com/nfpa10.pdf

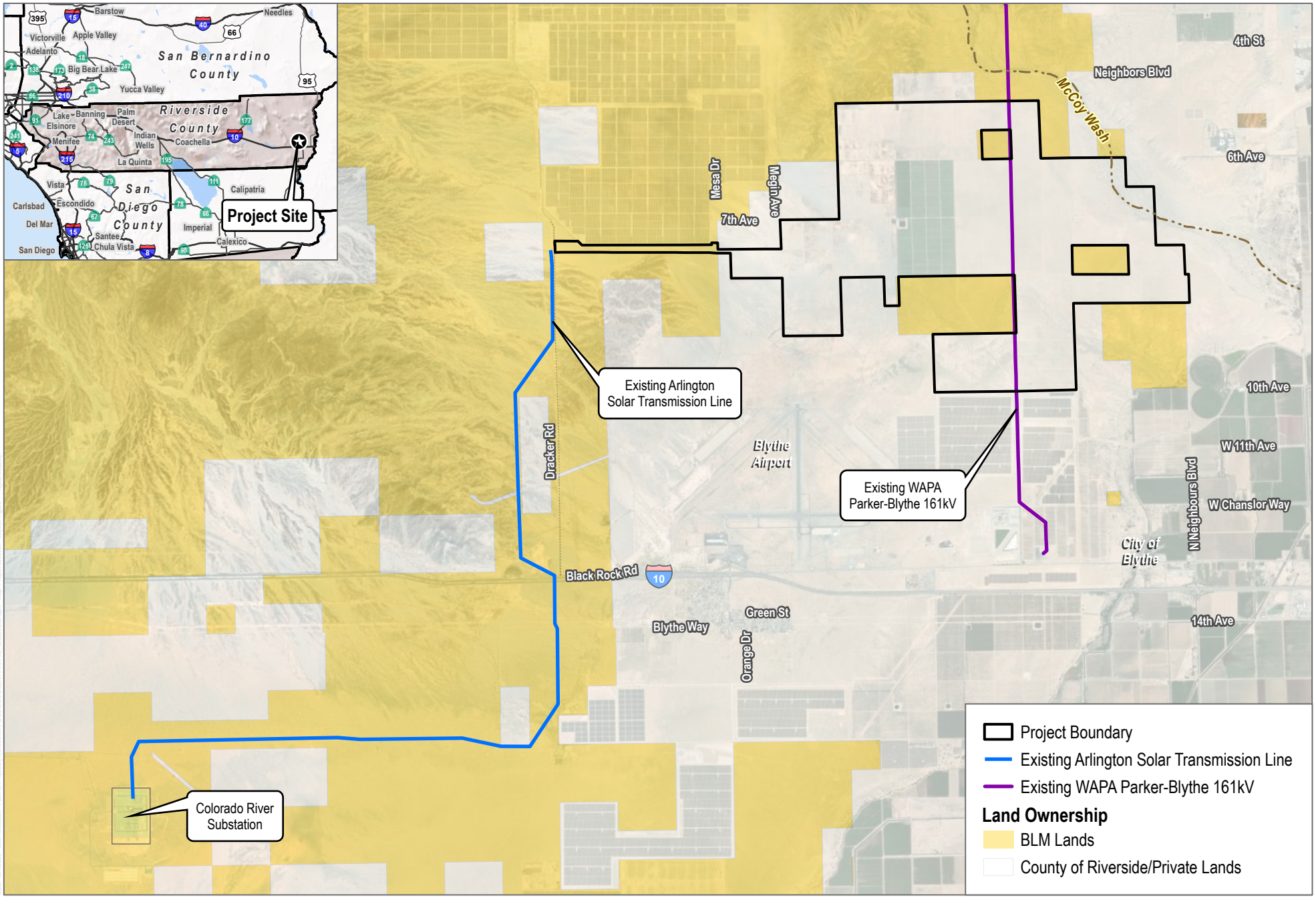
NFPA. 2018. "NFPA 22: Standard for Water Tanks and Private Fire Protection." Accessed January 2025. https://dl.imenada.com/nfpa22.pdf

NFPA. 2019. "NFPA 51B: Standard for Fire Prevention During Welding, Cutting, and Other Hot Work." 2019. https://ohse-library.weebly.com/uploads/9/6/0/5/96054774/nfpa_51b-2019.pdf

NFPA. 2020. "NFPA 855: Standard for the Installation of Stationary Energy Storage Systems." Accessed January 2025. https://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/JVR/AdminRecord/IBR/326a%20NFPA%202020.pdf

Riverside County. 2024. "Riverside County Fire Code." Accessed January 2025. https://library.municode.com/ca/riverside_county/codes/code_of_ordinances?nodeId=TIT8HESA_CH8.32FIC0

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SOURCE: Maxar 2023

DUDEK

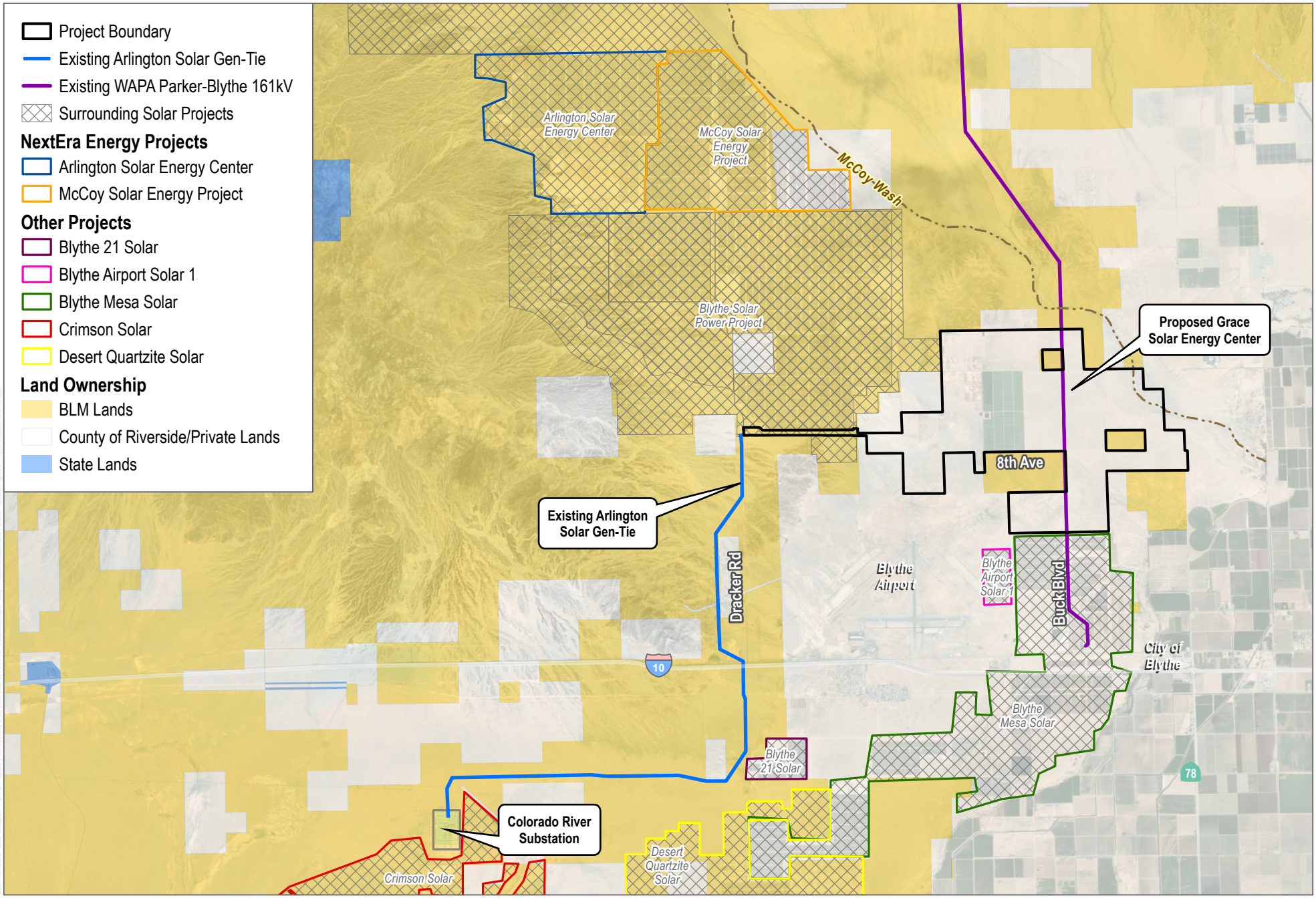
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FIGURE 1

Project Location

Grace Solar Energy Center

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SOURCE: Maxar 2023

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0 4,125 8,250 Feet

FIGURE 2

Project Location and Parcels

Grace Solar Energy Center

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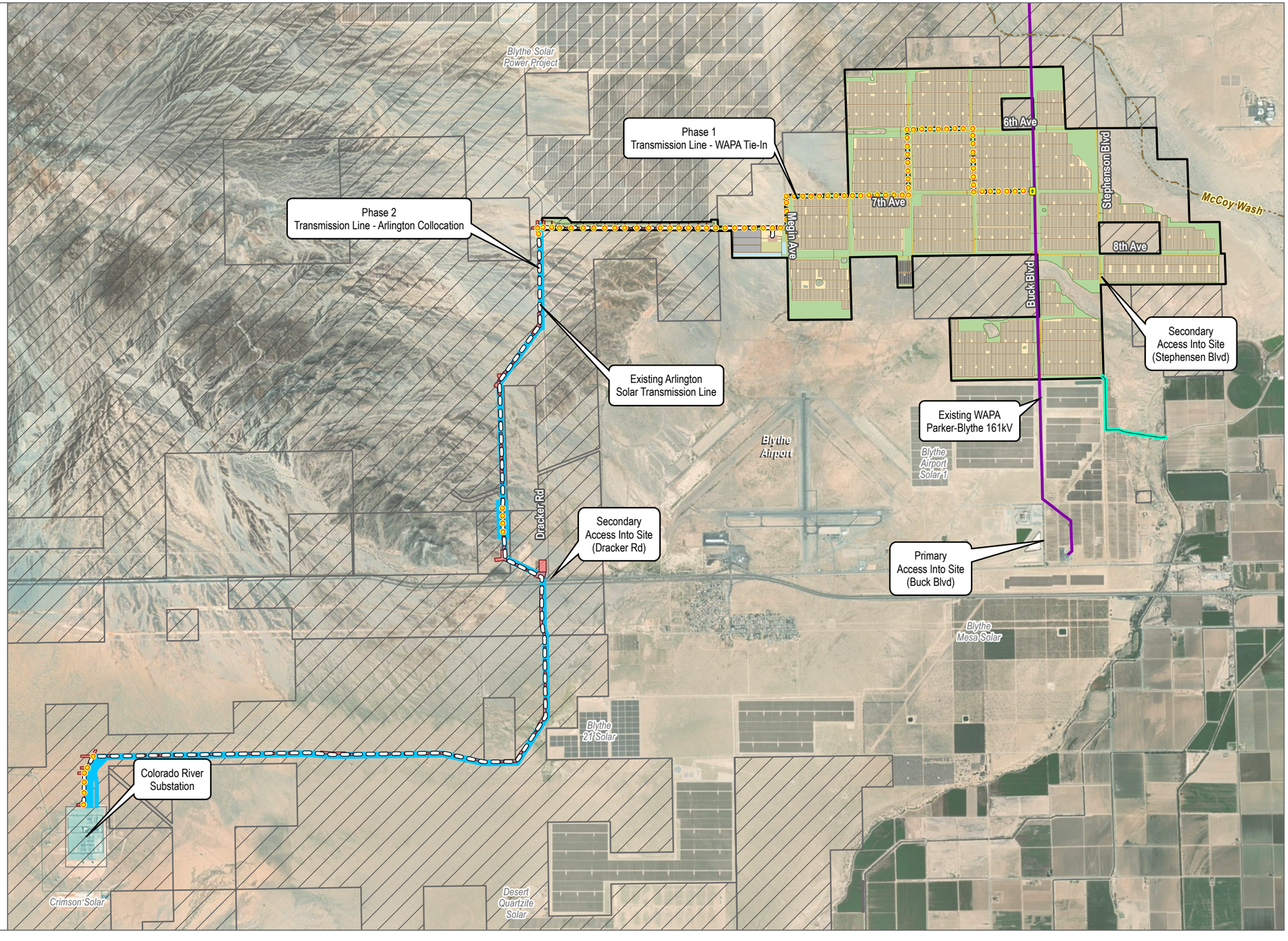
Project Boundary
BLM Lands

Existing Infrastructure

Existing Water Pipeline
Existing Access Routes
Existing WAPA Parker-Blythe 161kV
Existing Arlington Gen-Tie Corridor

Site Plan

Access Road
Basin
BESS
Fenced Area
Laydown
Public Road Improvement
Solar Array
Substation
Limits of Disturbance
Transmission Line Work Area
Phase 1 Transmission Line - WAPA Tie-In
Phase 2 Transmission Line - Arlington Collocation
Proposed Transmission Line Pole
Switchyard
O&M Building



SOURCE: Maxar 2023

DUDEK

0 2,000 4,000 Feet

FIGURE 3
Site Layout
Grace Solar Energy Center

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