

Wildland Fire and Hazard Mitigation Plan Front Range-Midway Solar Project

This Fire Protection Plan identifies the Front Range-Midway Solar Project's (Project) adherence to the El Paso County Land Development Code Section 6.3.3 Fire Protection and Wildfire Mitigation Standards. Project design and access was reviewed in consideration of the wildfire risks and need to provide adequate fire protection in order to:

- Regulate development, buildings and structures so as to minimize the hazard to public health, safety, and welfare;
- Ensure that adequate fire protection is available for new development;
- Implement wildfire hazard reduction in new development;
- Encourage voluntary efforts to reduce wildfire hazards; and
- Reduce the demands from the public for relief and protection of structures and facilities.

The Project was assessed for the risk of wildfire based on the *Wildfire Hazards Based on Colorado Vegetation Classification Project – El Paso County, Colorado* as referenced in Section 6.3.3(A)(6). The Project is in a low hazard – non forested area of the county (see attached). As such, wildfire hazard mitigation would not be required since wildfire hazard is minimal on the Project. Nonetheless, the Project will conform to the additional fire-related standards under Section 6.3.3 as requested by the county and described below.

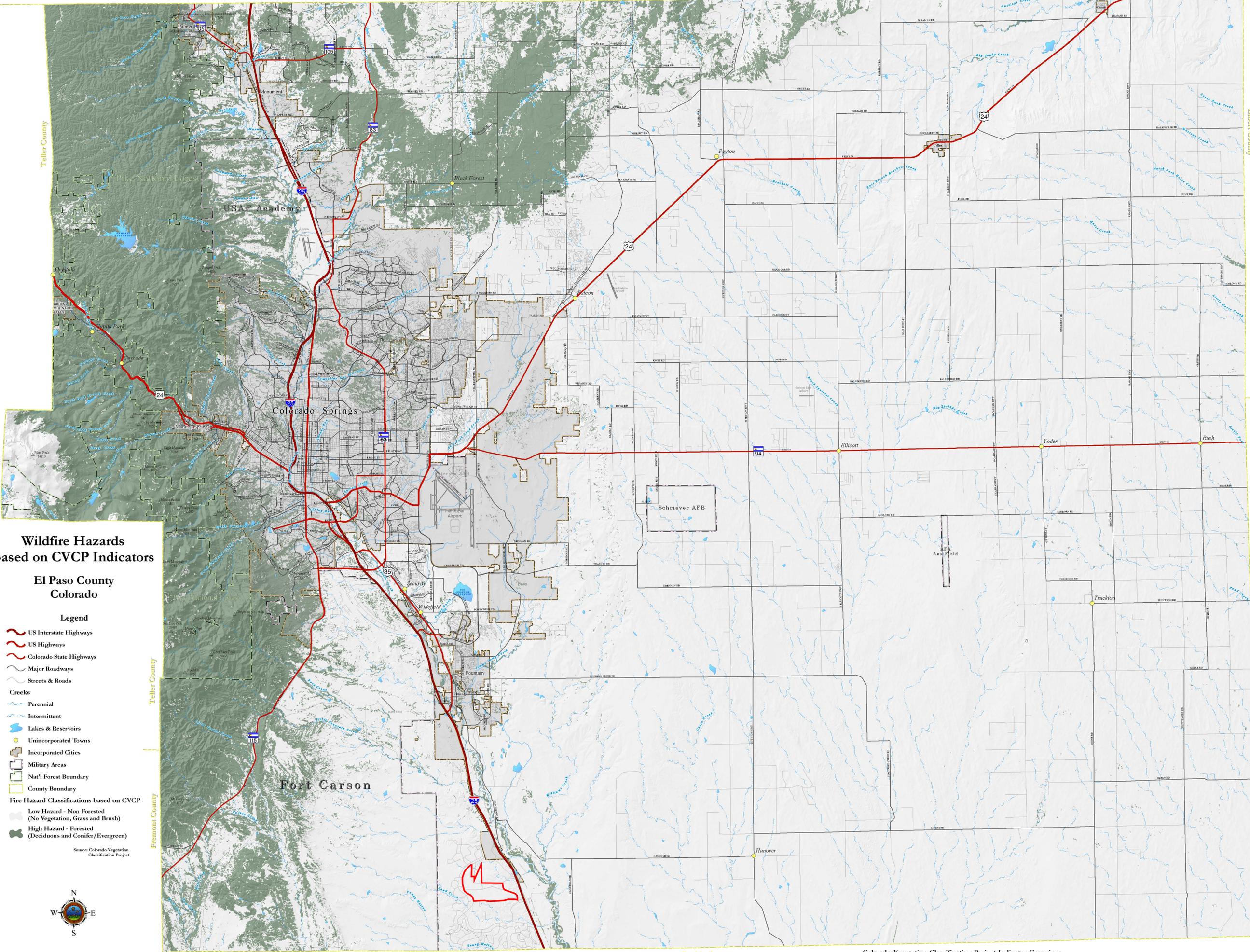
The Front Range-Midway Solar Project (Project) will receive services from the Hanover Fire Protection District (HFPD) through a mutual aid agreement with Hanover Fire Department. The HFPD provides fire and emergency services from three stations located at 17550 S. Peyton Way, 12225 Old Pueblo Rd. and 7930 Indian Village Heights. Services provided by Hanover Fire include wildland, structure, and vehicle fires; medical emergencies; rescues; and hazardous materials responses at a limited capacity for operational response. El Paso County will provide assistance on hazardous materials calls as needed. High angle rescue and heavy rescue would be provided by Ft Carson or Colorado Springs on a mutual aid agreement.

HFPD is equipped to handle first alarm fires and personnel include two medical squads. The department's equipment includes three engine pump trucks, three tender pump trucks, three brush trucks, a heavy brush pump truck, and two ambulances to respond to emergencies. Water will be pulled from one or more of the three Wigwam Water District Taps procured for the Project and located within the proposed WSE-O boundary. El Paso County has a hazardous material decontamination trailer, if needed. Their longest ladder is 25 feet. If a longer ladder is needed the Security Fire Department responds with their 75-foot ladder truck on all structure fires. The department's goal response time for 2017 is 10 minutes for first department vehicle on scene. In 2016 the HFPD averaged a 12 minute response time.

The Project has received a Fire Commitment Letter (see attached) from the HFPD and has agreed to the following requests to ensure adequate site access and safety for HFPD during incident response:

- Roads should be brought up to all season access during Project construction.
- Knox boxes will be located at all main gates along the perimeter of the solar facility.
- The Project will support classroom training during construction for firefighter and EMS workers on potential hazards during construction of the Project.

- The Project will support sight training for firefighter and EMS workers once construction is complete.
- The Project will control weeds on the Project to remove fuels.
- Fire breaks along the perimeter fences will be kept clear of vegetation to reduce the risk of grassland wildfire spreading into the Project.
- Gravel areas will surround the energy storage facility and kept clear of vegetation.
- Welding operations will not occur on red flag days or during any fire restrictions. Welding operations will have a fire watch and water trucks on site for support.
- Any onsite smoking area during construction will be clearly marked and cleared of all vegetation in a 20-foot radius equipped with appropriate disposal cans and extinguishers.
- Energy storage facility will be equipped with temperature control systems and either UL certification for fire events or a fire suppression system within the containers.
- The Project will provide a detailed fire event response plan for the energy storage facility.



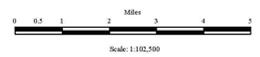
**Wildfire Hazards
Based on CVCP Indicators**

**El Paso County
Colorado**

Legend

- US Interstate Highways
- US Highways
- Colorado State Highways
- Major Roadways
- Streets & Roads
- Creeks**
- Perennial
- Intermittent
- Lakes & Reservoirs
- Unincorporated Towns
- Incorporated Cities
- Military Areas
- Nat'l Forest Boundary
- County Boundary
- Fire Hazard Classifications based on CVCP**
- Low Hazard - Non Forested (No Vegetation, Grass and Brush)
- High Hazard - Forested (Deciduous and Conifer/Evergreen)

Source: Colorado Vegetation Classification Project



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Pueblo County

Colorado Vegetation Classification Project Indicator Groupings

Low Hazard - Non Forested		High Hazard - Forested			
No Vegetation:	(1) Urban/Build Up (5) Barren Land (9) Wetland (11) Residential (12) Commercial (13) Rock (15) Tall Slopes & Rock Outcroppings (45) Soil	Grass:	(21) Dryland Agriculture (22) Irrigated Agriculture (302) Grassland (310) Grass/Forb Mix (311) Sparse Grass/Browse (320) Grass/Misc. 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Hanover Fire Protection District
13325 Old Pueblo Road
Fountain, CO 80817
(719) 382-1900



July 16, 2020

To: Front Range-Midway Solar Project (FRMW)
From: Chief Tatum, Hanover Fire Protection District

Re: Commitment Letter

Dear FRMW:

Based upon prior discussions with Mr. Iadarola in 2017 regarding the original Front Range-Midway Solar Project (FRMW) site plan, continuing communication with the project in 2019 and 2020, and the information exchanged about the revised Front Range-Midway Solar Project site plan, the Hanover Fire Department (HFD) is providing a commitment letter to provide Fire and EMS service for this project. This commitment letter to provide service is conditioned on a final project proposal submission to El Paso County Land Development services.

Hanover Fire Department still reserves the right to review and provide feedback on the submitted project design and fire mitigation plan with the Site Development Plan permit application. HFD will be interested in how this project will design roads on the interior and exterior of the project area. HFD expects all interior roads to be at least 16' wide along the fence to accommodate HFD's trucks and road design will allow all season access onsite. We expect an 8' fire break on the exterior of the fence that will be planted in low growing native vegetation. Prior to construction, HFD will review what roads may be closed or have restricted access to the area during the construction phase of the project.

The Hanover Fire Department is aware this project may include energy storage using lithium ion batteries onsite. Due to this, HFD requests the ability to review and understand the site design associated with the energy storage facility. Additionally, HFD requests the project provide a plan for HFD to address emergency response to the energy storage facility. This plan will include the steps needed to safely respond to a fire event at the energy storage facility and any handling of hazardous materials, if any, by HFD.

Based on previous conversations with project representatives, HFD is committed to provide service to FRMW. HFD requests Knox boxes be located at all main gates to each solar farm area for fire department access. During the project construction, HFD requests classroom training for firefighter and EMS workers on hazards they may come across and onsite training once the construction is complete. HFD will review and comment on the projects weed control plans on the outside and inside of the fence area. Finally, HFD will review and comment on the projects plans emergency service plans for the battery storage facility.

If you have any questions, please give me a call.

A handwritten signature in blue ink, appearing to read "Carl Tatum", is written over the text of the letter.

Chief Carl Tatum
Hanover Fire Department
13325 Old Pueblo Rd
Fountain CO 80817
Office 719-382-1900
Cell 719-492-2729