

## **4.4 WORKER SAFETY/FIRE PROTECTION**

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As described in detail below, impacts of the Modified Project on worker safety and fire protection are expected to be less than those of the Approved Project and will remain less than significant.

### **4.4.1 Project Changes Related to Worker Safety and Fire Protection**

The Modified Project proposes to utilize either fixed tilt or single-axis tracking PV modules for the Project's electrical generation. The elimination of SunCatchers would result in the elimination of hydrogen production and storage, the main consideration regarding the Approved Project's potential impacts to worker safety and fire protection. Other than the elimination of hydrogen generation and storage, there have been no project changes that would increase impacts relative to worker safety and fire protection.

### **4.4.2 Changes in Environmental Impacts**

As described in Section 4.5, Hazardous Material Management, the storage and use of hydrogen has been eliminated from the Modified Project. Therefore, the Modified Project's impacts to worker safety and fire protection would be less than or equal to those of the Approved Project.

### **4.4.3 Changes in Cumulative Environmental Impacts**

The Commission Decision concluded that the Approved Project would not result in any significant cumulative impacts to worker health and safety. Incremental impacts of the Modified Project on worker health and safety are expected to be the same or slightly reduced compared to the Approved Project. As described in Section 1.4.1, Cumulative Scenario, no new reasonably foreseeable future actions beyond those assumed in the Commission Decision have been identified. Therefore, no increase in cumulative impacts under the Modified Project is anticipated.

### **4.4.4 Changes in LORS Conformance and Other Permits**

In the Commission Decision, the Commission concluded that, with the implementation of the Conditions, the Approved Project would comply with all applicable LORS. As with the Approved Project, the Modified Project would comply with all applicable LORS, and no new or additional LORS have been identified.

However, during a pre-filing meeting with Staff, Staff requested a discussion of whether the Modified Project would be required to comply with NFPA requirements including installation of a fire loop and hydrants. Internal review of NFPA indicates that these

requirements, under NFPA 50, would not apply. K Road Calico Solar will coordinate with the County of San Bernardino Fire Department on all requirements relative to the Modified Project.

Correspondence with the Fire Department relative to NFPA requirements will be provided to the Commission under separate cover.

#### **4.4.5 Changes in Proposed Mitigation**

No new or more severe impacts requiring additional mitigation would result from the Modified Project. The mitigation measures proposed in the Commission Decision would mitigate impacts associated with the Modified Project to levels that would be less than significant.

#### **4.4.6 Changes in Conditions of Certification**

The conforming changes to the Conditions for the Modified Project related to worker health and safety are:

**WORKER SAFETY-2** The project owner shall submit to the CPM a copy of the Project Operations and Maintenance Safety and Health Program containing the following:

- An Operation Injury and Illness Prevention Plan;
- An Operation heat stress protection plan that implements and expands on existing Cal OSHA regulations (8 CCR 3395);
- A Best Management Practices (BMP) for the storage and application of herbicides;
- An Emergency Action Plan;
- Hazardous Materials Management Program;
- Fire Prevention Program (8 CCR § 3221); and;
- Personal Protective Equipment Program (8 CCR §§ 3401- 3411).

The Operation Injury and Illness Prevention Plan, Emergency Action Plan, the Heat Stress Protection Plan, BMP for Herbicides, and Personal Protective Equipment Program shall be submitted to the CPM for review and approval concerning compliance of the programs with all applicable safety orders.

~~These plans shall include programs to prevent exposure of workers to the unusual hazard of high intensity reflected light from the solar parabolic mirrors. The Fire Prevention Plan and the Emergency Action Plan shall address special precautions and responses to implement when a fire involves a SunCatcher or hydrogen piping located within 200 feet of a fence line where a~~

~~public access road exists directly on the other side of the fence.~~ The Fire Prevention Plan and Emergency Action Plan shall also be submitted to the San Bernardino County Fire Department and the BNSF railroad for review and comment.

**Verification:** At least 30 days prior to the start of ~~operations~~commercial operation, the project owner shall submit to the CPM for approval a copy of the Project Operations and Maintenance Safety and Health Program.

**WORKER SAFETY-8** K Road Calico Solar LLC is currently working with San Bernardino County Fire Department to determine an appropriate fire mitigation fee that more accurately matches the reduced risk form PV development on the site and elimination of the hydrogen and SunCatcher technology. K Road Calico Solar LLC will inform the Commission on the status of those negotiations.