

DRAFT
FIRE PREVENTION AND RESPONSE PLAN

for the

Broadwing Communications Services, Inc.
California Fiber Optic Expansion Project

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1 INTRODUCTION

The main purpose of this plan is to make contractors working on the Broadwing Communications Services, Inc. Ontario to San Diego Longhaul Route fiber optic cable installation project aware of fire prevention and response requirements and methods. This plan sets forth responsibilities for the prevention, suppression, and suppression of any fires in the project study area.

This plan contains the following sections:

- Section 1, “Introduction”
- Section 2, “Responsibilities”
- Section 3, “Fire Precautions”
- Section 4, “Fire Suppression”
- Section 5, “Fire Guard Duties”

1.1 PROJECT DEFINITION

The proposed Ontario to San Diego Longhaul Route will connect Broadwing’s existing terminal at 1590 Milliken Avenue, Suite B, Ontario, to its existing terminal at 5474 Complex Street, Suite 502 in San Diego. The route is approximately 114 miles in length and includes installation of fiber optic conduit within previously disturbed State, county, and city road rights-of-way. Approximately 56 miles of the route are located within Riverside County, 51 miles are located within San Diego County, and a small portion (seven miles) is located within San Bernardino County. Installation of the fiber optic conduit will be accomplished primarily by trenching in public streets, plowing in roadway shoulders, and/or directional boring in areas that are disturbed by routine right-of-way maintenance. Major street intersections, other utilities, and railroad tracks will be crossed using directional boring. Concrete-lined storm water conveyance channels and perennial streams will also be crossed using directional boring or by attaching to existing bridge structures, if permitted. Some unlined drainage channels that are not associated with any sensitive resources may be trenched. Approximately 200 handholes are proposed along the proposed route, at intervals of approximately 3,000 feet.

The route begins at the existing terminal located at 1590 Milliken Avenue, Suite B, in Ontario and runs south in Milliken Avenue to Riverside Drive (street name changes to Hamner Avenue), thence continuing south in Hamner Avenue to Cotta Street (extended), thence southwest in Cotta Street to Railroad Street, thence west in Railroad Street to North Vicentia Avenue, thence south in North Vicentia Avenue under Highway 91 (street name changes to South Vicentia Avenue) to Crestview Street, thence east in Crestview Street to South Vicentia Avenue, thence south in South Vicentia Avenue to Ontario Avenue, thence east in Ontario Avenue to El Cerrito Road (street name changes to Temescal Canyon Road), thence continuing southeast in Temescal Canyon Road to Lake Street, thence southeast in Lake Street to Audelo Street/Patrick Court (street name changes to Grand Avenue), thence continuing southeast in Grand Avenue to McVicar Street, thence northeast in McVicar Street to Palomar Street, thence southeast in Palomar Street to the City of Murrieta (street name changes to Washington Avenue), thence continuing southeast in Washington Avenue to Magnolia Street, thence northeast in Magnolia Street to Adams Avenue, thence southeast in Adams Avenue to Cherry Street, thence southwest in Cherry Street to Diaz Road, thence southeast in Diaz Road to Rancho California Road, thence southwest in Rancho California Road to Vincent Moraga Drive, thence south in Vincent Moraga Drive to Felix Valdez Road, thence east and southeast in Felix Valdez Road to 6th Street, thence southwest in 6th Street to Pujol Street, thence southeast in Pujol Street to 1st Street, thence east in 1st Street across and within the new 1st Street Bridge to Front Street, thence southeast in Front Street to its intersection with Highway 79, thence east in Highway 79 to Pala Road (Route S16), thence southeast in Pala Road to Rainbow Canyon Road, thence

south in Rainbow Canyon Road to Old Highway 395 (street name changes to Rainbow Valley Boulevard), thence continuing southwest in Rainbow Valley Boulevard to 8th Street, thence east in 8th Street to Rice Canyon Road, thence south in Rice Canyon Road to Pala Road (Highway 76), thence east in Pala Road to Couser Canyon Road, thence south in Couser Canyon Road to Lilac Road, thence south in Lilac Road to Valley Center Road (Route S6), thence south in Valley Center Road to the City of Escondido (street name changes to East Valley Parkway), thence continuing south in East Valley Parkway to its intersection with Bear Valley Parkway, thence continuing southwest in Bear Valley Parkway to Sunset Drive, thence southwest in Sunset Drive to the easterly Interstate 15 (I-15) right-of-way, thence south in I-15 right-of-way under Lake Hodges to Pomerado Road (Route S5), thence southeast in Pomerado Road to the City of Miramar (street name changes to Miramar Road), thence continuing west in Miramar Road to Kearny Villa Road, thence south in Kearny Villa Road to Topaz Way, thence southeast in Topaz Way to Complex Street, thence south in Complex Street to Broadwing's terminal located at 5474 Complex Street, Suite 502 in San Diego.

The proposed project crosses the municipalities of Norco, Corona, Lake Elsinore, Murrieta, and Temecula in Riverside County; Escondido, Poway, and San Diego in San Diego County; and Ontario in San Bernardino County. The proposed route is located in both urbanized and non-urbanized areas.

1.1.1 PROPOSED OP-AMP STATION LOCATIONS

Two optical-amplification OP-AMP stations are proposed for construction along the route and are located on private property outside existing road rights-of-way. One is located near Lake Elsinore at the northwest corner of Tranquil Lane and Grand Avenue in the community of Wildomar (Tranquil Lane site). The other is located just south of the Riverside/San Diego county line at the northeast corner of Rainbow Valley Boulevard and Rainbow Creek Road in the community of Rainbow (Warder site).

Both sites are currently vacant with no standing structures. The Tranquil Lane site is located in a semi-rural area within Riverside County, is approximately 0.9 acres in size, and is zoned for rural residential uses. The Warder site is located within a rural area of San Diego County, is approximately 0.3 acres in size, and is zoned for agricultural uses.

1.2 DEFINITION OF TERMS

- › Terms used in this document are defined as follows:
- › Land managers - agencies responsible for fire protection, such as U.S. Bureau of Land Management (BLM), U.S. Forest Service (USFS), and California Department of Forestry and Fire Protection (CDF).
- › Field representatives - employees representing the land managers.
- › Broadwing - Broadwing Communications Services Inc. personnel and its representatives.
- › Contractors - construction contractors hired by Broadwing to install the cable system.
- › Fireguard - an employee assigned by the contractor to carry out the duties of the fireguard, as outlined in this plan.
- › Sale Activity Level - a level of fire danger calculated and posted by the USFS through the National Fire Danger Rating System.

2 RESPONSIBILITIES

This section outlines the responsibilities of contractors and land managers for fire prevention and response.

2.1 CONTRACTOR

The contractor will implement the following general fire prevention, presuppression, and suppression activities:

- Ensure that prevention, detection, presuppression, and suppression activities are performed in accordance with this fire prevention and response plan and with state, county, and federal laws, ordinances, rules, and regulations pertaining to fire.
- Accompany field representatives during inspections of fire tools and equipment and take corrective action on notification that any fire protection requirements are not being met.
- Curtail or shut down any operation or construction activity that poses an unacceptable fire hazard until appropriate safeguards are taken.
- Notify the local CDF field representative when the project enters a new county.

The contractor will take the following actions should a fire occur within the project study area:

- Initiate action to suppress all project-caused fires unless relieved of this responsibility by the land manager. The contractor will determine the level of firefighting activity its personnel can safely engage in.
- Immediately alert all available project crews and send available crews to the fire with tools and equipment necessary to control the fire. The contractor will not use bulldozers or other heavy equipment unless authorized to do so by a fire agency or its representatives.
- Designate a person to act as coordinator who will handle messages regarding the fire and initiate action upon request until relieved by BLM, USFS, or CDF.
- Immediately notify the nearest field representative from the appropriate agency of the location and status of the fire and any action taken to suppress it. (See Fire Call Directory at the end of this plan.)

2.2 LAND MANAGERS

The responsibilities of BLM, USFS, and CDF are as follows:

- BLM is responsible for all fire prevention, presuppression, and suppression activities on BLM lands.
- USFS is responsible for all fire prevention, presuppression, and suppression activities on lands within national forest boundaries.
- CDF is responsible for fire prevention and suppression activities on all State Responsibility Areas and on federal lands where it has direct protection responsibilities.

BLM, USFS, and CDF will discuss fire protection measures with Broadwing and its contractors. In addition, these agencies will inspect the project study area for compliance with fire protection requirements and will notify Broadwing of any deficiencies.

BLM, USFS, and CDF may delegate the above responsibilities to a field representative.

3 FIRE PRECAUTION MEASURES

This section addresses the fire precaution measures that will be implemented to prevent fires.

3.1 COMMUNICATIONS SYSTEM

Broadwing will provide the contractor with a radio/cellular communications system for the project. The system will have two radio frequencies and one cellular telephone channel. The agency that has jurisdiction over fires in the area where the fire is located will be notified immediately of any fire.

3.2 FIRE PRECAUTION LEVELS

3.2.1 NATIONAL FIRE DANGER RATING SYSTEM

BLM uses the National Fire Danger Rating System to assign fire danger ratings. These ratings correlate with BLM staffing levels. The fire danger rating and/or staffing level can be obtained from the local BLM dispatch center. The fire danger ratings and approximate corresponding staffing levels are:

- Low staffing level: 0–1 person.
- Moderate staffing level: 2–3 persons.
- High staffing level: 3–4 persons.
- Very high staffing level: 4 persons.
- Extreme staffing level: 5 persons.

These ratings correlate to the Sale Activity Levels in the USFS Fire Precaution Schedule (see Section 3.2.2). The Sale Activity Levels can be used to determine the precautions the contractor should use on BLM lands.

3.2.2 U.S. FOREST SERVICE FIRE DANGER RATING SYSTEM

The procedures in this section usually apply to projects that occur in or near the boundary of a national forest. However, Broadwing will follow these procedures outside national forest boundaries because the fire potential within national forest boundaries can be a good indication of the fire potential in heavily vegetated corridors elsewhere in the project area.

USFS determines the daily fire danger level. These levels, which are known as Sale Activity Levels, range from 1 to 5. Each level has specific restrictions on what work can take place when that level is in effect. The Fire Precaution Schedule below shows these five levels.

Table 3.2-1 Fire Precaution Schedule	
Sale Activity Level	Description of Precautions Required
0,1,2	Normal fire precautions (as shown below in Section 4.0)
3	Normal fire precautions (as shown in Section 4.0), except areas for smoking must be designated and fires for warmth or cooking will require a written permit
4	Hoot owl restrictions apply
	Fireguard required for a period of one-half hour after end of a regular construction shift
	Restrictions should be lifted as soon as there is a significant break in burning conditions as a result of precipitation, longer nights, lower temperatures, or higher humidity's

Table 3.2-1 Fire Precaution Schedule	
Sale Activity Level	Description of Precautions Required
5	Shut down all operations (operations on mineral soil may continue with special land manager's permit) Restrictions on welding may be imposed
Area Closure	Total shutdown of all operations and area closed to entry. Advance notice will be given as soon as area closure appears certain, followed by a meeting convened to discuss the situation at the time

Broadwing and its contractors will implement fire precaution measures based on the above Sale Activity Levels. The fireguard will contact the closest USFS dispatcher each day between 4:00 and 6:00 p.m. (Pacific time) to obtain the Sale Activity Level to be followed the next day. The fireguard will advise the contractor of any change in the Fire Precaution Schedule no later than 9:00 a.m. the following day.

In certain specific instances, the land manager may modify the above precautions to more closely reflect the true status of local risks and hazards. The following are examples of situations in which the land manager may modify the precautions:

- Under unusually severe conditions or with operations that constitute an unusual risk, land managers may institute any or all of the above stipulations or may require additional action in certain specialized cases.
- In specific instances where it can be demonstrated that little or no risk will be incurred, land managers may permit certain construction activities to take place under carefully controlled conditions.

3.3 FIRE PRECAUTION MEASURES

3.3.1 FIRE PREVENTION

The contractor will implement the following precautionary measures:

Burning - Burning permits are required on private land and will contain special stipulations pertinent to the particular project or activity. When special burning restrictions are imposed by the state to protect air quality, burning permits may be suspended or modified.

Welding - All welding and cutting will be performed in areas cleared to mineral soil a minimum of 30 feet in diameter around the welding area. Two backpack pumps filled with water, one 5-pound dry-powder or CO₂ fire extinguisher, and one round-pointed, size 0 shovel with a handle at least 46 inches long will be carried with the welder at all times. The fireguard will be notified each day of all areas where welding and cutting has been performed. When the Sale Activity Level is 3 or 4, the fireguard will inspect all areas after welding and cutting has stopped. No welding will be permitted during Sale Activity Level 5.

Spark Arrester - Each internal combustion engine will be provided with a spark arrester or spark-arresting device meeting USFS Standard 5100-1a or SAE recommended practice J335(b) and J350(a). Engines used to provide power for trucks, truck tractors, buses, and passenger vehicles (except motorcycles) do not need a spark arrester if the exhaust system is equipped with a muffler, as defined in the California Vehicle Code. An exhaust-driven turbocharger is considered to be a satisfactory spark arrester if all exhausted gases pass throughout the rotating turbine wheel, there is no exhaust gas bypass to the atmosphere, and the turbocharger is in proper mechanical condition. Internal combustion engine

exhaust systems, arresters, and other devices will be properly installed and maintained. All flues used in construction operations and in construction camps will be equipped with spark arresters in good working order and meeting USFS standards.

Cooking and Warming Fires - No cooking or warming fires will be permitted along the project route.

Smoking - Smoking and fire rules will be posted on the project bulletin board in the contractor's field office. Supervisory personnel will oversee and require compliance with these rules. Smoking is prohibited during the fire season, except in designated areas agreed upon by Broadwing and the land manager. Under no circumstances will smoking be permitted while operating equipment or while walking or working in areas of vegetation. Smoking will be permitted only on bare ground or within enclosed vehicles.

Warning Devices - Tar pots, torches, highway flares, and other devices with an open flame will not be allowed in the project area. All warning devices must be either electric or battery-operated.

Small Engine Sites, Parking Areas, and Staging Areas - Equipment parking areas and small stationary engine sites will be cleared of all flammable material and equipped as required by law. Glass jugs or bottles will not be used as containers for gasoline or other flammable substances.

Refueling - Fuel trucks will carry a fire extinguisher with a rating of 40 B:C or higher charged with the appropriate chemical to control electrical and gas fires.

Red Flag Conditions - Prediction will be made during the daily Fire Weather Forecast for extreme fire behavior conditions, such as high winds, low humidity, high occurrence of lightning activity, or movement of a frontal system through the area. These conditions generally exist for short time periods (generally less than 24 hours), but may require special precautionary measures.

"Hoot-Owl" Restrictions - Will be in effect when Sale Activity Level 4 is reached. See "Description of Precautions Required" in the Fire Precaution Schedule.

Closures and Restrictions - Fire closures or restrictions on USFS lands are covered under 36 CFR 261.50. Closures and restrictions on state and privately owned lands are ordered by CDF in accordance with California laws and regulations. BLM lands may also be subject to closures and restrictions.

3.3.2 FIRE PRESUPPRESSION

Contractors will maintain continuous access to all roads for emergencies. Broadwing and its contractors will equip each vehicle, truck, or tractor with a minimum of one 5-pound dry chemical fire extinguisher with a rating of 5 B:C or higher; a round-pointed, size 0 shovel or equivalent; a fire ax or pulaski; and 5 gallons of water.

Each contractor will provide one 3,000-gallon fire tanker for its work zone. The fire tanker will be centrally located in active areas of the project. The tanker will contain a tank with a capacity of no less than 3,000 gallons. Mounted on the tanker will be a live hose reel or live hose basket with 250 feet of at least 3/4-inch I.D. heavy-duty rubber hose and a portable or power-takeoff pump with a discharge capacity of at least 20 gallons per minute at a pressure of 150 pounds per square inch. Gear-type pumps will be provided with a bypass or pressure relief valve so the hose nozzle may be shut while the pump is operating. The tanker unit will carry a hose nozzle of the shutoff type, adjustable for straight stream, spray, or fog; at least 12 feet of one-inch suction hose with an intake screen; and an additional 250 feet of 3/4-inch, heavy-duty rubber hose or 1-inch cotton-jacket rubber-lined or linen hose. Tools, adapters, and

accessories necessary to operate the pump, along with fuel sufficient to run the pumping unit for at least 2 hours, will be maintained with the unit at all times. The contractor should contact the fire agency with jurisdiction in the project area or the agency's representative for information on locations of water sources if needed.

The contractor will provide one sealed tool cache with hasp for each cable or manhole installation crew. The cache will be provided and maintained by contractors for emergency firefighting at each work location. In some cases, the cache may be moved in conjunction with the contractor's operation or as specified by the field representative. The tool cache will be red and will be labeled "For Fire Fighting Only;" the size of the tool cache will be proportionate to the operation, as specified in CPRC 4428(a). The chain saw requirements of CPRC 4428(b) will also be followed. As a guide, the tool cache may contain an inventory similar to the following:

- ▶ Electric head lamps with batteries
- ▶ First aid kit
- ▶ Knapsacks
- ▶ Pulaski's with sheaths
- ▶ Round-pointed, size 0 shovels
- ▶ Backpack pump filled with water.

4 FIRE SUPPRESSION

Broadwing and its contractors and subcontractors will take aggressive action to prevent and suppress fires on the permitted project area caused by Broadwing or its contractors. No bulldozers or heavy equipment will be used to suppress fires on public lands unless authorized by the land managers during a fire emergency.

Broadwing and its contractors will notify the closest fire dispatcher using the numbers provided in the Fire Call Directory immediately upon discovery of a fire.

If Broadwing or its contractors' personnel are the first to arrive at the scene of a project-caused fire, they should take aggressive action to suppress the fire until a BLM, USFS, CDF, state, county, or other fire suppression force arrives and assumes control of managing the incident. The contractor will determine the level of firefighting activity its personnel can safely engage in. Preserving life and safety are the top priorities in wildland fire policy for the jurisdictional fire agencies.

Broadwing and its contractors will provide available personnel and equipment as needed to completely suppress fires on the project route. The contractor will determine the level of firefighting activity its personnel can safely engage in. Broadwing or its contractors will be liable for all costs of suppressing fires caused by them. Personnel will remain on Broadwing's or the contractor's payroll for all project-caused fires, and Broadwing or its contractor will absorb the cost of equipment used in suppressing project-caused fires. A fire report will be completed for any project-caused fires on public lands. For fires not caused by the contractor or the project, the land manager will reimburse the contractor for all wages and equipment-use costs, as appropriate, according to fire-fighting rates common to the area if the Incident Commander or land management agency specifically orders or requests the contractor's personnel and equipment to assist in suppressing the fire.

5 FIRE GUARD DUTIES

The contractor’s fireguard will be responsible for the following duties:

- ▶ Regularly inspect all tools and equipment for compliance with the land manager’s specifications. Inspect tool caches weekly.
- ▶ Make regular inspections for compliance with all state, county, and federal laws, ordinances, and regulations pertaining to fire, flammable fuels, and explosives used in conjunction with this project.
- ▶ Inform Broadwing daily of the Sale Activity Level when working within or near the land manager’s boundary.
- ▶ Post smoking and other fire rules and restrictions in conspicuous places.
- ▶ Make initial attack on any fires caused by Broadwing or its contractors within or adjacent to the permitted area.
- ▶ Accompany USFS, BLM, and CDF field representatives during inspections of project operations.
- ▶ Keep USFS, BLM, and CDF field representatives informed of all burning and blasting operations.
- ▶ Ensure that all of the contractor’s employees are made aware of the contents of the fire prevention and response plan.
- ▶ Remain on duty in the immediate area of construction whenever any construction activity is in progress and during additional periods as required in the Fire Precaution Schedule.
- ▶ Report all fires to the appropriate fire protection office immediately. Call “911” if necessary to report fire emergencies or accidents.
- ▶ Assume supervision of fire suppression activities until officially relieved by a USFS, BLM, CDF, or other fire suppression officer.
- ▶ Ensure that the 3,000-gallon water tanker is onsite and has watered a minimum of 20 feet on each side of the projected path of the rock saw prior to rock saw operations.

Table 5.0-1 Fire Call Directory			
The following information is provided as a convenience. No warranty on the accuracy or completeness is given nor should be assumed. The contractor is responsible for compiling contact information for the appropriate fire response agencies.			
Agency	Contact	Phone No.	Emergency

NOTE: In case of emergency, call 911.