

## EXHIBIT C – Fire Policy

## FIRE POLICY

### FIRE POLICY FOR OPERATIONS

2016

Resource Conservation District (RCD) Fire Policy (Policy) applies to all Contractors, lessees, and permittees, and all other persons and entities, who are engaged in operational categories listed in Table 1 - RCD Operational Categories and Requirements within any portion of the project area on behalf of RCD, including all of their employees and/or subcontractors (collectively, Contractor). This Policy mandates certain equipment to be deployed, procedures to be followed, and preventive measures to be taken depending on the type of activity in which Contractor is engaged and the predicted Project Activity Level (PAL).

Intent - This Policy ensures Contractor is aware of and complies with the State of California's (State) fire prevention laws and additional fire preventive measures required by RCD. Some of RCD's required fire preventive measures are stricter than State fire prevention laws. Contractor should recognize conditions that may allow a fire to start. Contractor should take the appropriate precautionary measures to avoid a fire and be properly equipped and prepared to take appropriate action in the event of a fire.

Compliance with the Public Resources Code and Forest Practice Rules - The California Public Resources Code (PRC) and Forest Practice Rules (FPR) contain many provisions to reduce the risk of fire. By reference they are both incorporated into this Policy, and this Policy requires strict adherence to the PRC and FPR.

Effective Period and RCD PAL - In addition to requirements of the FPR and PRC, the Effective Period for all additional requirements of this Policy shall be determined by the Supervising Registered Professional Forester. The RCD Manager and/or consulting forester has authority to invoke a more restrictive PAL (or waive PAL requirements in burned salvage areas), based on local conditions, resource availability or other appropriate considerations. RCD Manager and/or consulting forester shall notify Contractor, verbally and in writing when either increased or decreased PAL measures are invoked and when Red Flag conditions are waived for operations in burned salvage areas.

State Fire Prevention Laws

Forest Practice Rules - Article 8 Fire Protection

#### **918, 938, 958 Fire Protection**

When burning permits are required pursuant to PRC § 4423, Contractor operators shall:

- (a) Observe the fire prevention and control rules within this article.
- (b) Provide and maintain fire suppression related tools and devices as required by PRC § 4427, 4428, 4429, 4431, and 4442.
- (c) Submit each year, either before April 1st or before the start of operations, fire suppression resources inventory to the Department as requested.

918.1, 938.1, 958.1 Fire Suppression Resource Inventory.

The Fire Suppression Resource Inventory shall include, as a minimum, the following information:

- (a) Name, address and 24-hour telephone number of individual and an alternate who has authority to respond to Department request for resources to suppress fires.

(b) Number of individuals available for firefighting duty and their skills.

(c) Equipment available for firefighting. The Fire Suppression Resource Inventory shall be made available upon request to the ranger unit headquarters office of the Department having jurisdiction for the project operation.

*918.3, 938.3, 958.3 Roads to be Kept Passable.*

Contractor operators shall keep all logging truck roads in a passable condition during the dry season for fire truck travel until snag and slash disposal has been completed.

*918.4, 938.4, 958.4 Smoking and Matches.*

Subject to any law or ordinance prohibiting or otherwise regulating smoking, smoking by persons engaged in project operations shall be limited to occasions where they are not moving about and are confined to cleared landings and areas of bare soil at least three feet (.914 m) in diameter. Burning material shall be extinguished in such areas of bare soil before discarding. The timber operator shall specify procedures to guide actions of his employees or other persons in his employment consistent with this subsection. **Note: RCD fire preventive measures are stricter; no smoking is allowed on any operation outside of a motor vehicle.**

*918.5, 938.5, 958.5 Lunch and Warming Fires.*

Subject to any law or ordinance regulating or prohibiting fires, warming fires or other fires used for the comfort or convenience of employees or other persons engaged in project operations shall be limited to the following condition:

1. There shall be a clearance of 10 feet (3.05 m) or more from the perimeter of such fires and flammable vegetation or other substances conducive to the spread of fire.
2. Warming fire shall be built in a depression in the soil to hold the ash created by such fires.
3. The operator shall establish procedures to guide actions of his employees or other persons in their employment regarding the setting, maintenance, or use of such fires that are consistent with (a) and (b) of this subsection. **Note: RCD fire preventive measures are stricter; no warming fires are allowed when burning permits are required by the State.**

*918.6, 938.6, 958.6 Posting Procedures.*

Operators shall post notices which set forth lists of procedures that they have established consistent with Sections 918.4 [938.4, 958.4] and 918.5 [938.5, 958.5]. Such notices shall be posted in sufficient quantity and location throughout their operating areas so that all employees, or other persons employed by them to work, shall be informed of such procedures. Operators shall provide for diligent supervision of such procedures throughout their operations.

*918.7, 938.7, 958.7 Blasting and Welding.*

Timber operators shall provide for a diligent fire watch service at the scene of any blasting or welding operations conducted on their operating areas to prevent and extinguish fires resulting from such operations.

*918.8, 938.8, 958.8 Inspection for Fire.*

The timber operator or his/her agent shall conduct a diligent aerial or ground inspection within the first two hours after cessation of felling, yarding, or loading operations each day during the dry period when fire is likely to spread. The person conducting the inspection shall have adequate communication available for prompt reporting of any fire that may be detected. **Note: RCD fire preventive measures are stricter; requiring 2 continuous hours of patrol under certain conditions.**

918.10, 938.10, 958.10 Cable Blocks.

During the period when burning permits are required, all tail and side blocks on a cable setting shall be located in the center of an area that is either cleared to mineral soil or covered with a fireproof blanket that is at least 15 ft. in diameter. A shovel and an operational full five-gallon back pump or a fire extinguisher bearing a label showing at least a 4A rating must be located within 25 feet of each such block before yarding.

Public Resources Code, Division 4, Chapter 6.

4427. Operation of fire causing equipment. During any time of the year when burning permits are required in an area pursuant to this article, no person shall use or operate any motor, engine, boiler, station equipment, welding equipment, cutting torches, tarpots, or grinding devices from which a spark, fire, or flame may originate, which is located on or near any forest-covered land, brush-covered land, or grass-covered land, without doing both of the following:

(a) First clearing away all flammable material, including snags, from the area around such operation for a distance of 10 feet.

(b) Maintain one serviceable round point shovel with an overall length of not less than forty-six (46) inches and one backpack pump water-type fire extinguisher fully equipped and ready for use at the immediate area during the operation.

This section does not apply to portable power saws and other portable tools powered by a gasoline fueled internal combustion engine.

4428. Use of hydrocarbon powered engines near forest, brush or grass covered lands without maintaining firefighting tools. No person, except any member of an emergency crew or except the driver or owner of any service vehicle owned or operated by or for, or operated under contract with, a publicly or privately owned utility, which is used in the construction, operation, removal, or repair of the property or facilities of such utility when engaged in emergency operations, shall use or operate any vehicle, machine, tool or equipment powered by an internal combustion engine operated on hydrocarbon fuels, in any industrial operation located on or near any forest, brush, or grass-covered land between April 1 and December 1 of any year, or at any other time when ground litter and vegetation will sustain combustion permitting the spread of fire, without providing and maintaining, for firefighting purposes only, suitable and serviceable tools in the amounts, manner and location prescribed in this section.

(a) On any such operation a sealed box of tools shall be located, within the operating area, at a point accessible in the event of fire. This fire toolbox shall contain: one backpack pump-type fire extinguisher filled with water; two axes, two McLeod fire tools, and a sufficient number of shovels so that each employee at the operation can be equipped to fight fire.

(b) One or more serviceable chainsaws of three and one-half or more horsepower with a cutting bar 20 inches in length or longer shall be immediately available within the operating area, or, in the alternative, a full set of timber-felling tools shall be located in the fire toolbox, including one crosscut falling saw six feet in length, one double-bit ax with a 36-inch handle, one sledge hammer or maul with a head weight of six, or more, pounds and handle length of 32 inches, or more, and not less than two falling wedges.

(c) Each rail speeder and passenger vehicle, used on such operation shall be equipped with one shovel and one ax, and any other vehicle used on the operation shall be equipped with one shovel. Each tractor used in such operation shall be equipped with one shovel.

(d) As used in this section:

(1) "Vehicle" means a device by which any person or property may be propelled, moved, or drawn over any land surface, excepting a device moved by human power or used exclusively upon stationary rails or tracks.

(2) "Passenger vehicle" means a vehicle which is self-propelled and which is designed for carrying not more than 10 persons including the driver, and which is used or maintained for the transportation of persons, but does not include any motor truck or truck tractor.

4429. Camps or local headquarters, firefighting equipment. During any time of the year when burning permits are required in an area pursuant to this article, at any camp maintained in such area for the residence of employees, or at any local headquarters in such area of any industrial, agricultural, or other operations on or near any forest-covered land or brush-covered land, there shall be provided and maintained at all times, in a specific location, for firefighting purposes only, a sufficient supply of serviceable tools to equip 50 percent of the able-bodied, personnel, resident of such camp, or working out of such headquarters, for fighting fires. Among these tools shall be included shovels, axes, saws, backpack pumps, and scraping tools. With such tools there shall also be one serviceable headlight adaptable for attachment to at least one-half of the tractor-bulldozers used on the operation, and a sufficient number of canteens and flashlights to equip a third of the able-bodied personnel.

4431. Gasoline powered saws, etc.; firefighting equipment. During any time of the year when burning permits are required in an area pursuant to this article, no person shall use or operate or cause to be operated in the area any portable saw, auger, drill, tamper, or other portable tool powered by a gasoline-fueled internal combustion engine on or near any forest-covered land, brush-covered land, or grass-covered land, within 25 feet of any flammable material, without providing and maintaining at the immediate locations of use or operation of the saw or tool, for firefighting purposes one serviceable round point shovel, with an overall length of not less than 46 inches, or one serviceable fire extinguisher. The Director of Forestry and Fire Protection shall by administrative regulation specify the type and size of fire extinguisher necessary to provide at least minimum assurance of controlling a fire caused by use of portable power tools under various climatic and fuel conditions. The required fire tools shall at no time be farther from the point of operation of the power saw or tool than 25 feet with unrestricted access for the operator from the point of operation.

4442. Spark arresters or fire prevention measures; requirement; exemptions.

(a) Except as otherwise provided in this section, no person shall use, operate, or allow to be used or operated, any internal combustion engine which uses hydrocarbon fuels on any forest-covered land, brush-covered land, or grass-covered land unless the engine is equipped with a spark arrester; as defined in subdivision (c), maintained in effective working order or the engine is constructed, equipped, and maintained for the prevention of fire pursuant to Section 4443.

(b) Spark arresters affixed to the exhaust system of engines or vehicles subject to this section shall not be placed or mounted in such a manner as to allow flames or heat from the exhaust system to ignite any flammable material.

(c) A spark arrester is a device constructed of non-flammable materials specifically for the purpose of removing and retaining carbon and other flammable particles over 0.0232 of an inch in size from the exhaust flow of an internal combustion engine that uses hydrocarbon fuels or which is qualified and rated by the United States Forest Service.

(d) Engines used to provide motive power for trucks, truck tractors, buses, and passenger vehicles, except motorcycles, are not subject to this section if the exhaust system is equipped with a muffler as defined in the Vehicle Code.

(e) Turbocharged engines are not subject to this section if all exhausted gases pass through the rotating turbine wheel, there is no exhaust by pass to the atmosphere, and the turbocharger is in effective mechanical condition.

(f) Motor vehicles when being operated in an organized racing or competitive event upon a closed course are not subject to this section if the event is conducted under the auspices of a recognized sanctioning body and by permit issued by the fire protection authority having jurisdiction.

### **Additional Preventive Measures Required by RCD**

The Effective Period of RCD's **additional requirements** under this Policy shall be determined by the District Manager and/or consulting forester. RCD's Effective Period may be waived or invoked under specific conditions identified by the RCD Manager and/or consulting forester. The RCD Manager and/or consulting forester shall notify **Contractor**, verbally and in writing, of the Effective Period start date.

**Determination of Project Activity Level Monitoring and Operational Requirements** - The PAL is a rating of predicted fire risk based on local fuel and weather data. Table 1 - RCD Operational Categories and Requirements lists: categories of activities, PALs applicability, and procedures or equipment necessary for each activity.

### **Definitions and Conditions**

**Brush and Blade Guards** - **Contractor** shall ensure that operators clean out guards no less frequently than every two hours during operations to prevent the build-up of vegetative material.

**Communication Devices** - On site of every operation, **Contractor** shall possess a communication device that is capable of contacting fire dispatch within 15 minutes either directly or indirectly through other contacts. The communication device must be one of the following: King Radios, Cell Phones, Two Way Radios, or Satellite Phones.

**Designated Patrolman** - For those activities specified in Table I - RCD Operational Categories and Requirements walking patrols described under PAL's D or Ev must be conducted by a Designated Patrolman who has no other duties to complete during the requisite patrol period. Designated Patrolmen must be equipped as described in the "Foot Patrol" section at the bottom of Table 2 - Daily Procedures and Restrictions by Project Activity Level.

**Fire Inspections** - An RCD representative will conduct random fire inspections on each operation and will use the attached "Contractor Fire Protection Checklist" (Checklist) to assess whether Contractor is completely compliant with this Policy. The RCD Representative will provide a copy of a completed Checklist to Contractor and place another copy in the RCD file for that operation. If the RCD Representative observes that Contractor is not in compliance with all items of the Checklist, Contractor shall immediately correct the operations so they are complaint, and RCD shall have the right to suspend Contractor's operation while Contractor makes all necessary corrections.

**Fire Pumpers** - As designated in Table 1 - RCD Operational Categories and Requirements several activities and operations require either a staffed water tender with Communication Devices (as required above) and a fire pumper with a minimum capacity of 250 gallons and 200 feet of minimum 1 inch hose, or a compressed air foam TRI-MAX 30 or comparable suppression unit, located on each active operation. The fire pumper and water tender shall be in working order and capable of delivering water under sufficient pressure at 200 feet to properly operate a standard fire nozzle.

**Hot Saw Harvesters and Masticators** - All Hot Saw harvesters and masticators shall be equipped with a compressed air foam TRI-MAX 3, a comparable fire suppression unit, or a system specifically approved by the RCD Manager and/or consulting forester. Contractor shall train each operator on the use of the approved suppression system.

Each PAL contains specific procedures and restrictions to be implemented to reduce the risk of fire. These are summarized in the Table 2 - Daily Procedures and Restrictions by Project Activity Level.

**On-Site Supervisor** - Contractor shall designate an On-site Supervisor when the daily PAL is D, Ev or E/Red Flag. The On-site Supervisor shall be capable of receiving notices, taking action, and directing a response to a fire. The designated On-site Supervisor shall be identified in the daily PAL record.

Operations using Hot Saws or masticators - require a portable fire suppression unit capable of being transported directly to the location of the fire with equipment immediately available on site or by being self-propelled (Skidgine). Such fire

suppression units shall be a minimum capacity of 250 gallons with 200 feet of hose or compressed air foam TRI-MAX 30 or comparable suppression unit. All equipment shall be maintained in good working order.

Red Flag Warning (Non-Lightning) - Should the Contractor be aware through contact with CAL FIRE, National Weather Service public service radio announcements, other fire weather web sites, or through RCD notification that "Red Flag Warning" conditions have been issued and are in effect for the Contractor's area of operations, Contractor shall follow the procedures and restrictions of PAL E and shall be in effect for the time period in which the Red Flag Warning is in place.

Red Flag Warning (For Lightning) - Contractor's operations under a Red Flag Warning (For Lightning), declared specifically in response to predicted lightning activity, may proceed under the RCD PAL assigned to the operation for that day. Continued operations under RCD PAL's for Red Flag Warning (For Lightning) is an overriding condition that will potentially reduce the risk of fire spread in the event of a local lightning strike requiring an immediate response. This is achieved by having operation crews and equipment on site and available to respond.

Table 1.RCD Operational Categories and Requirements

"X" - Denotes that the specific requirements apply to the listed Operational Categories.

Operational Categories	Requirements							
	PAL	Designated Patrolman PAL D and EV	Walking Patrol	Portable Fire Unit	Fire Pumper	On Board Suppression Unit	Fire Tool Box & 5 Gal Pump	Fire Plan (IAP)
Chainsaw Operations	X		X				X	X
Chpping Operations	X	X	X				X	X
Fire Trail Construction	X		X				X	X
Hot Saws (RMBS)	X	X	X	X		X	X	X
Mastication	X	X	X	X		X	X	X
Site Prep	X		X				X	X
Slashing	X		X				X	X
Tilling (Ripping)	X		X		X		X	X
Tractor/ Shovel/ Mechanical	X	X	X		X		X	X
Welding	X		X					

Table 2. Daily Procedures and Restrictions by Project Activity Level

Each PAL includes all preceding (lower) PAL requirements.

PAL	PROCEDURES AND RESTRICTIONS
A*	Immediately following the cessation of operations using Hot Saws, a walking foot patrol is required over all of the Hot Saw area operated that day.
B*	Immediately following the cessation of operations using Hot Saws, chainsaws, ground-based tracked equipment, cable yarding, ripping, clearing, mastication, welding, blasting, or cutting torches, a walking foot patrol is required over all of the areas operated that day.
C*	Immediately following the cessation of operations using Hot Saws, chainsaws, ground-based tracked equipment, cable yarding, ripping, clearing, mastication, welding, blasting, or cutting torches, a walking foot patrol is required over all of the areas operated that day.
D	Operations using Hot Saws, cable yarding (with tail hold blocks or motorized carriages) and those additional non-cable operations listed in Level C must be suspended at 1:00 P.M. and a walking foot patrol for 2 continuous hours is required over all of the areas operated that day. These operational activities may only continue if a walking foot patrol is conducted once every hour on all areas operated that day, with patrols commencing at 1:00 P.M. and continuing for 2 continuous hours after cessation of operations.
Ev	Welding, blasting, and cutting torches are prohibited. All non-landing chainsaw operations, Hot Saws, ground based tracked equipment, cable yarding with tail hold blocks or motorized carriages, ripping, clearing, and mastication may operate until 1:00 PM as long as a walking foot patrol is conducted once every hour on all areas operated that day, with patrols commencing at 9:00 AM and continuing for 2 continuous hours after cessation of operations.
E & Red Flag (Non Lightning)	All non-landing chainsaw operations, Hot Saws, ground based tracked equipment, cable yarding with tail hold blocks or motorized carriages, ripping, clearing, mastication, welding, blasting, and cutting torches are prohibited.

**Note: An On-site Supervisor is required for operations when the PAL is D, Ev or E/Red Flag.**

Note: When an operation is conducted that requires a Designated Patrolman for PAL D and Ev in Table 1, the 2 continuous hours of patrol will be performed by a "Designated Patrolman" on PAL D and Ev days. All other operations within the Operational Categories in Table 1 that require Walking Patrol (but not by a Designated Patrolman) still require a walking patrol for 2 continuous hours on PAL D and Ev days.

Note: Yarding with rubber-tired grapple skidders; cable yarding with no tail hold blocks or motorized carriages; landing operations with tracked loaders, delimiters and log processors; and hauling, equipment servicing and dust abatement are permitted to operate all day regardless of the PAL.



Foot Patrol - The individual doing the walking foot patrol shall have a vehicle parked within or as close as possible to the patrolled area, and the vehicle shall be equipped to fight fire with all the following:

- 1) A serviceable 5 gallon backpack pump filled with water,
- 2) A shovel or McLeod fire tool,
- 3) Either a double bit ax or a serviceable chainsaw with a minimum 20 inch bar, and
- 4) Communications equipment capable of summoning additional fire suppression resources and promptly reporting to the agency responsible for fire suppression.

The patrol shall carry a round point shovel with an overall length of at least 46 inches during the entire walking foot patrol. A record containing the name of the fire patroller, date, and time of patrol shall be kept on site and available for inspection by RCD or any fire agency.

# Contractor Fire Protection Checklist

Contractor: \_\_\_\_\_

On-site sup.: \_\_\_\_\_

## 1. Scaled Fire Tool Box

### Comments

Located at active project area	Y	N	_____
Backpack type fire extinguisher filled with water	Y	N	_____
2 axes	Y	N	_____
2 McLeod fire tools	Y	N	_____
# of shovels = to # of active employees	Y	N	_____
1+ chainsaws with > 20" bar and 3 1/2 hp	Y	N	_____
(note: or in area of op)	Y	N	_____

## 2. Fire Pumper/ Water Tender with

Communications and 200' minimum			
1" hose/ TriMax 30	Y	N	_____
Located on project area	Y	N	_____
Filled with water	Y	N	_____
In operating condition	Y	N	_____

## 3. Vehicles – Each vehicle has a shovel

Y	N	_____
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## 4. Equipment – All equipment has a shovel

Y	N	_____
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## 5. Fallers & chainsaw operators

Chainsaws equipped with spark arrester	Y	N	_____
Fire extinguisher or shovel within 25' of op	Y	N	_____

## 6. Inspection for Fire

Is walking foot patrol being conducted	Y	N	_____
Designated Patrolman for PAL's D & Ev	Y	N	_____

## 7. Welding

Fire watch service at the scene of welding			
To prevent or extinguish fires resulting			
From the above.	Y	N	_____

## 8. Predicted Project Activity Level Data Log

Available and data current	Y	N	_____
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## 9. Hotsaws/ Masticators

Fire suppression unit or equipment with a charged			
on board compressed air foam system and two way			
radio or mobile phone with capability of communication			
with Contractor's place of business or local fire			
fighting agency.	Y	N	_____

## 10. Current fire Suppression Resource Inventory or IAP

Y	N	_____
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Deficiencies shall be corrected immediately and may result in the suspension of operations.

Contractor: \_\_\_\_\_ Company: \_\_\_\_\_

Date: \_\_\_\_\_ Date: \_\_\_\_\_

# FIRE SUPPRESSION RESOURCE INVENTORY (FSRI) INCIDENT ACTION PLAN (IAP)

CONTRACTOR NAME \_\_\_\_\_

PROJECT NAME \_\_\_\_\_

## IN CASE OF FIRE CALL ( )

( )

Primary Fire Dispatch Phone Number

Secondary Fire Dispatch Phone Number

( )

( )

Other Contacts

Company Office

Forester

*(a) Name, address and 24-hour telephone number of an individual and an alternate who has authority to respond to Department requests for resources to suppress fires.*

Primary Contractor Contact Name

Address:

Street

City

Zip

Primary Phone Numbers: Main Office (Work)

Cell

Home

Alternate Contact Name

Address:

Street

City

Zip

Alternate Phone Numbers: Main Office (Work)

Cell

Home

*(b) Number of individuals available for firefighting duty and their skills*

Field Supervisor

Phone: Work

Cell

Home

Assistant Field Supervisor

Phone: Work

Cell

Patrolman, Dispatcher or Other

Phone: Work

Cell

Home

Individuals	Crew Foreman	Dozer Operators	Fallers	Fire Fighters	Others	Total
In woods						
Other						

*(c) Equipment available for firefighting. The Fire Suppression Resource inventory shall be submitted to the ranger unit headquarters office of the Department having jurisdiction for the operation.*

Equipment	Location	Number	Make & model	Size
Bulldozers with lights				
Bulldozers without lights				
TIMBCOs or similar				
Dozer transports				
Crew trucks				
Pickup trucks conventional				
Pickup trucks 4-WD				
Portable pumps				
Fire trailer				
Water trucks with pumps				
Other				

Location	Shovels	Chain Saws	Scrapping Tools	5 Gal Pumps	Flashlight.	Canteens	Radios
Job Site							
On Equipment							
Pickups							
Other							

*Note: Items (a), (b) and (c) as stated above are the minimum requirements of Forest Practice Rules 918.1, 938.1 and 958.1*

LOCATION CURRENT/PROSPECTIVE TREATMENT AREAS Attach map showing: roads, landmarks, creeks, other water sources etc., for directing fire crews by telephone to any fire on or near logging area.

Legal description of land:

Section(s)

Twp.

Range

County

Geographic location of treatment areas:

Best emergency access routes in to treatment areas:

Nearest emergency helicopter landing zone (UTM or Lat/Long if possible):

DESCRIBE COMMUNICATION DEVICE AND CREW RESPONSIBILITIES FOR  
DETECTION OF FIRE

DESCRIBE METHODS AND DOCUMENTATION FOR DAILY FIRE  
INSPECTION OF TREATMENT AREAS BY RESPONSIBLE PATROL

Date submitted to Cal Fire	Name of Operator	Name	Title
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NOTE: As required in *Forest Practice Rules 918, 938 and 958 item (c)* Submit each year, either before April 1st or before the start of timber operations, a fire suppression resource inventory to the Department as required by the rules. This form is supplied as a convenience to help Licensed Timber Operators comply with the California Forest Practice Rules. Additionally, for other Contractors this form will help with compliance of the company Fire Policy.

*The purpose of a FSRI/IAP is to organize communications, encourage training, establish crew responsibilities and for establishing immediate fire reporting and response procedures.*