Steve Taffolla

From: Ken Daubach <dumptruck.01@wildblue.net>
Sent: Wednesday, March 02, 2011 10:18 PM
To: ECOSUB; catulewind@blm.gov
Subject: Public Review Comments from the Boulevard/Jacumba/La Posta Fire Safe Council
Attachments: Comments.docx

Please see the attached document. It contains comments from the Boulevard/Jacumba/La Posta Fire Safe Council Board.

Thank you,

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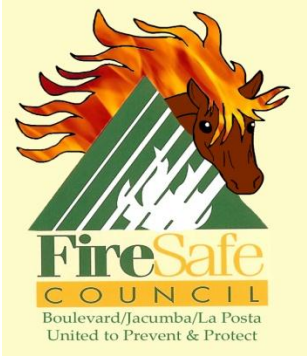

Boulevard/Jacumba/La Posta Fire Safe Council
43577 Olde Hwy. 80
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February 8, 2011
Boulevard/Jacumba/La Posta Fire Safe Council Comments on the East County Substation/Tule Wind/Energia Sierra Juarez Gen-Tie Projects,
D.15 Fire and Fuels Management

The Boulevard/Jacumba/La Posta Fire Safe Council consists of 11 board members from and representing the areas of Boulevard, Jacumba, and La Posta Reservation. All members of the board are volunteers. The demographic includes retired locals, housewives, students, full-time employees, tribal members, and former fire fighters. Our mission statement is "The Mission of the Fire Safe Council of San Diego County is to provide education, exchange information, and foster fire prevention and fire safety within the County of San Diego."

Boulevard is located 68 miles from San Diego and 46 miles from El Centro at an elevation of 3,700 feet. Boulevard is comprised of many smaller older communities combined under the name of the post office. These smaller older areas include Live Oak Springs, White Star, Oak Knoll, Manzanita, Calexico Lodge, Mistletoe Lodge, Witches Grove, Tierra Del Sol, Bankhead Springs, and Boulevard. Boulevard has a population of 1,496. Water is provided only by wells. Boulevard is characterized by large lot single-family residences and large and small ranches. The majority of the homes have been built before 1970. Sprinkler systems and many other modern fire safety methods are absent from these homes.

Jacumba is located between San Diego and Imperial Valley. The elevation is 2,900 feet and just 200 yards north of the Mexican border. A new enlarged border fence runs through the community. Jacumba has a population of 600. It has a water district which services residents by aquifer water which is the sole source of water for this community. The majority of the homes have been built before 1970. Sprinkler systems and many other modern fire safety methods are absent from these homes.

La Posta is located 56 miles east of San Diego and 52 miles west of El Centro in the Laguna Mountains. La Posta has a population of 18. They have a land area of 3,471 acres.

The predominate type of vegetation in the Fire Safe Council jurisdiction includes chaparral and scattered riparian areas and live oak groves. The oaks may be affected by the golden spotted oak borer due to the extended drought conditions. The vegetation in the area has very old fuels, some over 60 years old that pose a threat to these communities if they ignite. These communities are prone to very high Santa Ana Winds. The communities of Boulevard, Jacumba, and La Posta are listed as very high areas of fire hazard severity. Boulevard, Jacumba, and La Posta have had no major fires for over 50 years.

Stated in D.15.1.1 General Overview: "the Proposed PROJECT would be located primarily within a very high fire hazard severity zone (CAL FIRE 2007a). CAL FIRE uses Fire Hazard Severity Zones to classify the anticipated fire-related hazard for state responsibility areas (SRAs). The very high fire hazard severity designation can be attributed to a variety of factors including highly flammable, dense, drought-adapted desert chaparral vegetation, seasonal, strong winds, and a Mediterranean climate that results in vegetation drying during the months most likely to experience Santa Ana winds. Santa Ana winds are winds originating from the Great Basin that create extreme fire weather conditions characterized by low humidity, sustained high speeds, and extremely strong gusts. ….. wind speeds of 40 miles per hour (mph) can be maintained for hours with gusts from 70 to 115 mph possible….. this situation can lead to serious firer suppression problems, resulting in temporary closure of sections of main highways."

Stated in D.15.1.1 Firesheds: "Firesheds are defined as regional landscapes that are delineated based on a number of fire-related features including fire history, fire regime, vegetation, topography, and potential wildfire behavior….As defined in the Sunrise Powerlink EIR/EIS, the ECO Substation and ESJ Gen-Tie

projects both occur entirely within the Boulevard Fireshed while the Tule Wind Project occurs primarily in the La Posta Fireshed with southern portions in the Boulevard Fireshed … firesheds are relevant to the Proposed PROJECT, as the three proposed projects occur within the core area of these two firesheds, and the two firesheds encompass areas within the Santa Ana wind influence areas in relation to potential ignitions from the three proposed projects."

Some of the infrastructure values at risk include the Boulevard Substation (SDG&E), local water district pumps and equipment, Communications Towers at Tierra Del Sol, Jacumba Elementary, Clover Flat Elementary School (Boulevard), the Highland Senior Center, Boulevard Volunteer Fire Station, the Jacumba Volunteer Fire Station, the Anza Borrego Resort, Desert View Tower, two grocery stores, Sacred Rocks, Jacumba Post Office, the Boulevard Post Office, La Posta Casino, unstaffed Sheriff's substation, and a large US Border Patrol Headquarters located in Boulevard.

Stated in D.15.1.1 Fire History: "Recorded ignitions within the fireshed include a variety of sources, including equipment use, vehicles, campfires (including fires from illegal immigrants), debris burning, lightning, smoking, and powerline-related ignitions."

These projects will add to the above listed fire dangers. Many of these fire dangers are unpreventable. Fires in Mexico are not suppressed and often threaten or cross the U.S. border.

There are two volunteer fire departments that provide fire response and assist with medical and other emergencies to the local communities of Jacumba/Boulevard, Jacumba Volunteer Department and Boulevard Volunteer Fire Department in cooperation with the County of San Diego, and the San Diego Rural Jacumba Volunteer Fire Department, CAL FIRE, and BLM.

The Boulevard and Jacumba Volunteer Departments are not permanently manned. Reservists sign up to work on certain days. If no one signs up or they cannot come up to the fire department, the station is unmanned. The stations are manned by about two fire fighters, which is an insufficient number on any type of fire. Only one of the current volunteer fire fighters is a local resident. This means that whenever the interstate and highways are closed due to high winds, weather, or fires, the out of town reservists cannot come to the fire department to assist.

There is concern for the inability of residents to be able to safely evacuate from some areas of the community as stated by fire representatives and local residents. Fire representatives have stated that it might be helpful for residents to be educated about safer sites to shelter in if they are overcome by fire.

Stated in D.15.1.1 Wildfire Modeling Results: "…ranked high, very high, or extreme (CAL FIRE 2005)."

Stated in D.15.1.1 Fire History: "….over the last 50 years, 36 wildfires greater than 10 acres have been recorded. ….. Of note, the 1970 Laguna Fire in this fireshed was ignited by a downed electrical distribution line."

Stated in D.15.1.1 Fire Suppression: "Fire suppression responsibilities within the La Posta Fireshed are tasked to the San Diego Rural Fire Protection District, San Diego County Fire Authority, CAL FIRE, BLM, USFS, and Tribal governments. These agencies include significant firefighting resources to serve the area's wildfire potential, especially with the combined CAL FIRE and USFS air attack capabilities that can reach the area within 20 minutes or less."

The above paragraph does not reflect that the air attack capabilities can only reach the area in 20 minutes or less if there are no other instances in the entire state of California. Another over-looked fact is that although there are significant firefighting resources, there is not sufficient manpower to utilize the resources.

There is not enough escape potential in these communities. All the roads are two-lane only. There are only two freeway entrances in each community. The traffic added to the roads by the projects would only further obstruct the limited escape routes currently available.

Listed in D.15.1.1 under Fires Caused by Equipment Use, there are 25 more fire hazard listed. These include hazards during the Construction Phase, Operation and Maintenance Phase, and Fires Caused by Power Lines. For decommissioning, all of these hazards will once again be present. In an area already teeming with fire hazards, this will increase the likelihood of fires greatly.

Under-grounding with super conducting cable is the preferred Fire Safe Council method. The fire danger risks will be decreased if the line is put under ground. Some items listed in D.15.1.1 that would no longer be a fire hazard are "capacitors that can explode", "structural integrity in high-wind environments",

"SDG&E power line failure caused by inadequate maintenance practices", "contact between large birds and power line", and "gunshots fired at power line hardware."

As stated in the document, "In addition to more prudent vegetation management and line maintenance, SDG&E prepared a plan in which the utility would shut down power during dry and windy condition s in areas at highest risk for wildfires." This plan is a risk in itself as only one local fire department has a generator, the water is run off of wells which do not work when there is no power, and many of the residents have no generators. SDG&E does have a contract with Red Cross to set up shelters during these power outages, however, there are no buildings east of Campo that are structurally sound for Red Cross to use. The procedures of these shelters enforce that the shelters will be open only from 9AM-5PM, there would be no over-night sheltering, and no services, water or otherwise, for animals. There are no local water supply facilities for residents to get water to take home. Jacumba has a water district but it is not available to the other communities. The nearest location for importing water is 60 miles away. The water is completely unavailable if the roads are closed due to weather or emergency conditions. Local residents, the County of San Diego Board of Supervisors, and CPUC opposed and rejected the shut-down plan. All of the projects in this document are located in the shut-down plan area.

Stated in D.15.1.1 Fires Caused by Wind Turbines: "When mechanical or electrical failures cause turbines to catch fire, they may burn for many hours due to the limited ability of fire suppression crews to effectively fight fires hundreds of feet above the ground. Wind –blown flaming debris from a turbine fire can ignite vegetation in the surrounding area." According to Tule Wind representatives, fire suppression systems for wind turbines are still in the process and are not yet available.

Stated in D.15.1.1 Environmental Effects of Fires: "…fire can also be detrimental to biological and other natural resources, such as air quality and water quality." Fires are not just a dangerous hazard; they have impacts that continued even after the initial threat has been extinguished.

Stated in D.15.1.1 Biological Resources: "Because vegetation communities can be converted following fire, these changes in dominant vegetation communities can drastically affect plant and animal habitat and can affect the prevalence of special-status species." This can cause different species of non-native plants to grow quickly in the absence of the natural plants. These plants are more prone to fires than the native species.

Stated in D.15.1.1 Air Quality: "Wind, for instance, generally results in lower smoke concentrations because wind causes smoke to mix with a larger volume of air. Regional weather systems, such as the Santa Ana winds of Southern California, on the other hand, can spread fire quickly and result in numerous devastating impacts. The Santa Ana winds effectively work to reverse the typical onshore flow patterns and blow winds from dry, desert Great Basin areas westward toward the coast. As a result, coastal communities can be impacted by fires originating in inland areas (Lipsett 2008)." Impacts will affect both cities and back-country communities.

Stated in D.15.1.1 Firefighting in San Diego County *Bureau of Land Management*: "The Fire and Aviation Directorate Program is tasked with providing aerial firefighting support for fires occurring on BLM lands. Aircraft used by the BLM are BLM-owned and contracted." The nearest airports are located 60 miles away. Aerial firefighting is unreliable due to wind and weather conditions. In the document, BLM's economic opportunities are listed as a benefit to the communities. However, as can be seen by the recent down-grading of McCain Valley, Presidential directives can override anything that BLM promises or is currently participating in. There are no fire breaks in the communities and there has not been any community education in relation to fire safety and suppression.

Stated in D.15.1.1: "…CAL FIRE fire policy is to suppress all vegetation fires of 10 acres or less upon initial attack." Under power lines, turbines, or other dangerous structures, fighting the fire is left to the discretion of the firefighters' involved. These projects are contributing to many new obstacles that will make firefighting more difficult if not impossible.

Stated in D.15.1.1 United States Forest Service: "…USFS Firefighting Air Attack Base in Ramona (operated May through November)" Ramona is located 60 miles away from the represented communities. Electrical fires possibly started by these projects may or may not start during these months, since the elements that start these fires are not seasonal.

Helicopters, while definitely helpful, depend on weather conditions and the pilot's final decision on whether he'll fly in those conditions.

CAL FIRE's Interagency Command Center is located in El Cajon, also 60 miles away.

Stated in D.15.1.1 County of San Diego: "In addition, there are numerous Fire Safe Councils (including the Boulevard/Jacumba Fire Safe Council) that are volunteer groups that meet with fire agencies to assist with fuel-reduction strategies and fire safety education." The Boulevard/Jacumba/La Posta Fire Safe Council is the only fire safe council in the area of these projects. Our fire safe council is still under a year in development and is run completely by volunteers. There is no funding for the fire safe council and we are still researching ways to help our communities with fire safety and suppression.

There are only 15 rural fire agencies (mostly volunteer) to protect the 1.5 million acres of unincorporated parts of the county. Protection has been 'on-call' in a very limited or at very best 'part-time' capacity. 'Around the clock' protection which is promised by 2012, there will still be about 2 firefighters per station, an insufficient number for successful firefighting strategy.

Stated in D.15.-2 Topography: "…includes terrain that is favorable to wildfire spread including steep slopes, ravines, mountains, and valleys. The ECO Substation Project site slopes gently to the west with elevations ranging from approximately 2,800 to 3,900 feet amsl. The Tule Wind Project would be located in the In-Ko-Pah Mountains and in the McCain Valley area, which have moderate slopes and elevations between roughly 3,600 and 6,400 feet amsl. The ESJ Gen-Tie Project site is a gently sloping portion of the Jacumba Valley at an elevation of approximately 3,300 to 3,400 feet amsl."

Stated in D.15.-2 ECO Substation Project: "These projects components would be on primarily gently sloping to flat terrain and occurring within succulent scrub and/or chaparral vegetation. Chaparral vegetation represents a higher potential risk for ignition and spread than succulent scrub." This project is being set on property with a grove of 100-year old live oak trees. The trees will be taken down because of the project. On the west side of the project, the property is alongside a residential area. This will directly affect the homes and residents in the vicinity. It will increase their insurance as well as the likelihood of their homes being exposed to fire.

Stated in D.15 -2 Tule Wind Project: "…the potential for wildfire ignition and spread is higher than associated with the ECO Substation Project." The historic McCain Valley homestead is near this project. The road leading to Lark Canyon is one way in and out. If someone is camping or using the recreational facilities, an emergency may block the only way out.

Stated in Table D.15 -3 Project Components for Each Project Area Fire Environment Interface: The projects' permanent impacts could come to 682.75 acres. If some catastrophe hits the impacted areas, there are only four firefighters to cover that area, and that is if they are not already on an emergency call. This acreage does not include all the homes and other areas in the areas surrounding the impacted areas.

Stated on page D.15 -23 Assets at Risk: "Rural land uses are generally located between the communities of Jacumba and Boulevard, and tribal lands are located north and south of Interstate 8 (I-8) near Boulevard, North of I-8, …. The U.S. – Mexico border fence is a dominant feature on the landscape south of I-8 and is highly visible from the community of Jacumba and from ECO Substation and ESJ Gen-Tie Project components." These projects cover a vast amount of land and are in locations that are spread out over a large area. Firefighters are limited and cannot cover all these areas if something were to happen.

Stated on page D.15 -23 ECO Substation Project: "Based on the low density, rural land uses, and there are a relatively low number of potentially affected structures at risk within the immediate vicinity of the ECO Substation Project. There are a total of 20 residences/structures within approximately 1,000 feet (range from 115 to 950 feet) of the project's proposed substation and electrical transmission line." No mitigation for even *20* residences is unacceptable. The nearest structure is only 115 feet away from the project. The residents' safety is directly affected by this project. It will not only endanger the residents, but raise the cost of their home insurance and lower their property values.

Stated on page D.15 -24 ESJ Gen-Tie Project: "Land use in the vicinity of the ESJ Gen-Tie Project includes one trailer approximately 2,400 feet northwest of the gen-tie and a second trailer roughly 2,400 feet west of the proposed transmission line. The trailer to the northwest may be an illegal land use based on the lack of County permits." All structures, trailers or otherwise, should be considered with the same respect. Even if one of the trailers is illegal, the property is still at risk. An illegal trailer may actually increase the fire danger of the Project.

Stated on page D.15 -24 Regional Assets at Risk: "Assets at risk from wildfire include all structures within approximately 40 miles to the west of the project site, stretching from the Cleveland National Forest to the urbanized areas of Pine Valley, Alpine, El Cajon, Chula Vista, and some coastal cities . This area includes terrain, vegetation, and climate that has historically supported wildfire spreads. Some of the area has no recorded fire history, other areas haven't burned

for 40 years, since the Laguna Fire in 1970, indicating that fuels may be heavy and would readily spread fire. …. nearest community of Boulevard being listed as a federally recognized community at risk of wildfire. … As such, County fire estimates that over 2,000 residences (not including other structure) may be at risk of loss during a wind driven wildfire (Miller et al. 2009)." This Project will not only adversely affect the locals but everyone in the above listed areas. All these risks also affect Mexico should a wildfire cross the border.

Stated in Federal Wildland Fire Management Policy: "Firefighter and public safety is the first priority in every fire management activity….Sound risk management is a foundation for all fire management activities…..Fire management programs and activities are economically viable, based upon values to be protected, costs, and land and resource management objectives." Stated in National Fire Plan: "The National Fire Plan was a Presidential directive in 2000 as a response to severe wildland fires that had burned throughout the U.S. The National Fire Plan focuses on reducing fire impacts on rural communities and assurance for sufficient firefighting capacity in the future. (National Park Service 2010)". These projects are adding multiple new risks to the impacted communities. The projects are bringing in no new ways to counter these risks.

The National Electric Safety Code 1977, 2006 recommends the use of underground electric supply and communication lines. This code, however, is not applicable in the State of California as the state has adopted its own standard. The recommendation for underground should be considered carefully.

Stated in California Fire Plan: "Involve the community in the fire management planning process…. Assess public and private resources that could be damaged by wildfires…Develop pre-fire management solutions and implement cooperative programs to reduce community's potential wildfire losses…pre-management solutions are fuels breaks…The Fire Plan does not contain any specific requirements or regulations. It acts as more of an assessment of current fire management practices and standards and makes recommendations on how best to improve the practices and standards in place." None of this is being applied to any of the impacted communities.

Stated in California Public Utilities Commission General Order 95: Rules for Overhead Transmission Line Construction: "In addition, Rule 35 requires that dead or diseased trees that overhang or lean toward and may fall into a span be removed." The spread of the Golden Spotted Oak Borer needs to be taken into

consideration. There have been no studies east of Pine Valley. Effected trees will have to be moved away from the lines too.

Also stated in California Public Utilities Commission General Order 95: Rules for Overhead Transmission Line Construction: "…should be adopted to address disaster preparedness, including damage from Santa Ana wind-driven firestorms (CPUC and BLM 2008a) According to SDG&E, the petition requested that the CPUC consider several items, including the following: Operating rural electrical line differently during severe fire weather…Mitigating potential hazards associated with rural lines including undergrounding line, using steel poles in place of wood, and shortening spans between poles." SDG&E's only mitigation so far has been steel poles. They have only put the steel poles from Substation to Substation, approx. 7 miles.

Stated in CAL FIRE Civil Cost Recovery Program: "…taxpayers should not be responsible for costs associated with suppressing fires caused by an act of human carelessness." The developers of these projects should know that they are responsible for paying for the suppression of any fires caused by their projects. This is a fire prone area and according to the above statement, they will be held financially responsible for any fires caused by these projects.

Stated in D.15.2.3 Regional Policies/Plans Eastern San Diego County Resource Management Plan: "…applicable to the ECO Substation and Tule Wind projects: WFM-01 Protect human life (both firefighters and public) and communities, property, and the natural resources on which they depend. Firefighter and public safety are the highest priority in all fire management activities. WFM-02 Reduce hazardous fuels around communities at risk within the wildland-urban interface using mechanical, manual, biological, and prescribed fire treatments, where applicable." Stated in CAL FIRE San Diego Unit Pre-Fire Management Plan: "…all communities within the San Diego County are potentially at risk of wildland fire (CAL FIRE 2009) …. The identified assets at risk in San Diego County include water (soil erosion after wildfires damage water flumes and storage facilities), structures, wildlife, air quality, and power and communication infrastructure. ….fuel breaks, defensible parameters around communities, clearances around structures," Stated in County of San Diego General Plan Public Safety Element: "Policy 1: The County shall seek to reduce fire hazards to an acceptable level of risks. Policy 2: The County will consider constraints in terms of fire hazards in land use decisions. Within designated areas where population or building densities may be inappropriate to the hazards present, measures will be taken to mitigate the risk of life and property loss. Policy 3: The County will

support the planning and coordinate implementation of a countywide fuel break and fuel management system." As is clear in the above statements, from the local to the state levels, according to these fire safety plans, these projects should not be acceptable in our area of high risk. The safety measures don't even exist out here yet. There have been no efforts for fuel or fire break management in the impacted communities.

Stated in Title 9, Division 6, Chapter 1: County Fire Code (Section 96.1.4703): "…(the ECO Substation, Tule Wind, and ESJ Gen-Tie projects would be located primarily within a Very High Fire Hazard Severity Zone). The FPP, which requires that the topography, combustible vegetation , and fire history (among other factors) be considered during development of the plan, addresses water supply, vehicular and emergency apparatus access, travel time to the nearest fire station, structure setback from property lines, ignition-resistant building features, fire protection systems and equipment, impacts to existing emergency services, defensible space, and vegetation management." Our communities do not have the manpower, the capabilities, the fire-suppression equipment or any of these listed factors. Our community's fire safety and suppression resources are limited when available.

Stated in D.15.3.1 Definition and Use of the California Environmental Quality Act Significance Criteria/Indicators under the National Environmental Policy Act: "Activities associated with project construction, maintenance, or decommissioning (Tule) significantly increase the probability of a wildfire resulting in damaging impacts to communities, firefighter health and safety, and /or natural resources … The presence of the overhead transmission line significantly increases the probability of a wildfire resulting in damaging impacts to communities, firefighter health and safety and/or natural resources…The presence of the project creates obstructions to fire suppression efforts, resulting in damaging impacts to communities and/or natural resources…Activities associated with project constructions or maintenance result in a fuel vegetation matrix with an increased ignition potential and rate of fire spread. … 1. The project cannot demonstrate compliance with the following fire regulations: California Fire Code, CCR, County Fire Code, and the County Consolidated Fire Code. 2. A comprehensive FPP has been required, and the project is inconsistent with its recommendations including fuel modification. 3. The project cannot meet the emergency response objectives identified in the Public Facilities Element of the County General Plan or offer Same Practical Effect." These projects have plans in place that are not sufficient for the high risk impacted communities. According to Table D.15-4: All projects are considered Class I: Significant – cannot be mitigated

to a level that is less than significant. If the projects are decommissioned, the Class I impacts are once again increased during decommissioning.

Stated in ECO Substation Project Construction: "…potentially aerial stringing (helicopter), refueling, and maintenance activities." Helicopters increase the fire danger risks every time they are put up. They are even more of a risk when working with performing a dangerous activity. Stated in Operation and Maintenance: "Operation would include transmission of electric current through transmission lines and substation equipment. Operation of the ECO Substation Project may result in vegetation ignitions and wildfire from equipment failure (e.g., transformers, circuit breakers), transmission line arcing, bird or floating debris contact, or pole failure and subsequent line arcing." All these risks can be mitigated by undergrounding the lines. "…Proposed ECO Substation Project, resulting in a trained staff ready to act should a controllable ignition occur." The local staff varies due to the volunteer status of our local fire departments. There are no more than two firefighters available each day. They are rarely the same firefighters. They are all from out of town and not familiar with the area.

Stated in Tule Wind: "…vehicles, moving wind-driven generators and related parts and increased activity in the area. Wind turbines in California annually result in 35 turbine generator related fires (IAEI 2010). Under worst case wind conditions, with wind gusts in excess of 50 mph, burning material (embers) may travel a mile or more, held aloft by the wind (Dudek 2010)." The increased fire dangers are extreme. This area was considered for an airport but due to the wind gusts exceeding 100 mph and unstable currents, it was deemed too dangerous for an airport. This relates both to the safety in relation with the helicopters used on the projects and the wind turbines. Embers cannot be predicted.

MM FF-5: Tule Wind does not yet have an operational fire suppression system built into their nacelles. In the document, it states: "the project will include fire suppression systems. Although these systems are not available in a tested, state or nationally approved package for wind turbines" They may not have this technology available by the time these wind turbines are installed.

One of the items listed under the ESJ Gen-Tie Project Construction as a possible fire ignition source is 'potentially discarded cigarettes'. These sites should be 'smoke-free' in order to prevent the fire danger that comes with discarded cigarettes.

The proposed projects, Campo, Manzanita, and Jordan wind energy, will also have a Class I designation. The construction of Sunrise Powerlink and the Border Patrol station have not been taken into consideration with the amount of risks the area is being subjected to.

Impact FF-2: These problems would be mitigated by undergrounding the overhead lines.

Stated in Electrical Transmission Line: "…overhead transmission lines present an ongoing source of potential wildfire ignitions for the life of the project." This can be mitigated by undergrounding the line, otherwise, the fire dangers will be more extreme than they already are.

Impact FF-3: ECO Substation Project: "…adequate fire access during a fire or medical emergency. Therefore, there is no impact associated with the substation with regards to effectiveness of firefighting (No Impact)." There is no manpower in the community. Without the stations being covered on a 24-hour basis, there is no guarantee of effectiveness of firefighting. There is an impact.

Transmission lines to the ECO Substation present many hazards. Some stated in the document: "Wildland firefighters working around energized transmission lines may be exposed to electrical shock hazards including the following: direct contact with downed power lines, contact with electrically charged materials and equipment due to broken lines, contact with smoke that can conduct electricity between lines, and the use of solid-stream water applications around energized lines. … the presence of the electrical transmission line may result in the decision to let a fire burn through the area before attacking with ground and aerial firefighting resources. A potential outcome of not providing immediate attack on a wildfire ignition is that it is able to build in size and intensity, especially under weather favorable to fire spread. ….This type of fire behavior significantly complicates fire containment." Lines should be undergrounded.

Transmission lines also affect aerial firefighting. Stated in the document: "The presence of the line represents various aerial fire attack hazards including increasing the risk of transmission line direct contact by aircraft or water buckets, resulting in a "no fly" zone or restricting aerial water or retardant drop effectiveness in areas with transmission lines. Limiting the effectiveness of aerial fire containments activities is considered significant since this form of fire attack has proven to be an especially effective means of slowing or containing fires,

particularly in areas where there is limited access or longer response times." This doesn't even take into consideration if there is no aircraft coverage, such as during high winds or at night. Undergrounding the lines is the only reasonable option.

MM FF-6 Funding for FireSafe Council. While it is important to fund local organizations, one must remember that they are volunteer run and operated. There is no guarantee that the organization will be able to decrease the impacts to a reasonable level. As a local FireSafe Council, we recommend the options 'no projects' or underground all overhead transmission lines.

Stated in the document: "There is uncertainty in how Boulevard's volunteer fire and rescue department will be able to handle a fire or other emergency event at the top of new industrial turbines which now stand between 400 and 600 feet tall." Another point is that being 'volunteers', the firefighters change on an almost constant basis and the stations are not always manned. The communities would need a 24-hour, fully staffed station with firefighters that were properly trained for these scenarios.

Stated in the document: " "fires at an industrial wind energy facility represents a new and significant health and safety issue that needs to be fully and properly addressed" (County of San Diego 2010b)."

Stated in the document under Tule Wind: "though the project may impact firefighting effectiveness, it may benefit firefighting access to some remotes arras under specific conditions by providing a road network…. To coordinate the delivery of large-scale equipment trucks and cranes, so not to block or obstruct fire routes or equipment." At presentations, Tule Wind has stated that they would try to use helicopters as much as possible to avoid environmental damages. So, with this stating that there will still be large scale equipment and roads, this just adds to the amount of fire hazards, as well as obstruction of evacuation routes.

Transmission lines to the Tule Wind Project present many hazards. Some stated in the document: "Wildland firefighters working around energized transmission lines may be exposed to electrical shock hazards including the following: direct contact with downed power lines, contact with electrically charged materials and equipment due to broken lines, contact with smoke that can conduct electricity between lines, and the use of solid-stream water applications around energized lines. … the presence of the electrical transmission line may result in the decision to let a fire burn through the area before attacking with

ground and aerial firefighting resources. A potential outcome of not providing immediate attack on a wildfire ignition is that it is able to build in size and intensity, especially under weather favorable to fire spread. ….This type of fire behavior significantly complicates fire containment." Lines should be undergrounded.

Stated in the document about the ESJ Gen-Tie Project: "produce significant fire embers/brands, which would not be affected by the border wall. Interstate -8 may serve as a fire break to the north, assisting in the containment of wildfires not driven by Santa Ana winds." Fires create their own wind. The fact of the matter is that the fires are unpredictable.

Stated in the document about Proposed PROJECT: "Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class1)." Once again, the impacts are so significant that they cannot be mitigated.

Stated in Impact FF-4, non-native plants which are more prone to ignition and carry wildfire due to their tendency to dry earlier will be replaced by native plantings, where appropriate. In a high desert area, it is hard to plant anything. Even native plants do not always take. There is also the issue with needing water to plant over these areas.

Stated in MM FF-7 Preparation of Disturbed Area Revegetation Plan, Tule Wind, ESJ Gen-Tie Project, ECO substation, and the proposed projects all will disturb a large amount of acreage. Tule Wind alone will disturb a total of 762.5 acres, including 230 acres of temporary disturbance during construction. Each project's disturbance level is listed as Class II. If you consider the amount of native vegetation being disturbed and removed by all of these projects put together, the impacts are much more significant and together should be classified as Class I.

As stated in table D .15–5, the ECO substation alternatives are still mainly Class I risks. The Fire Safe Council recommends that as much transmission line as possible be undergrounded.

As stated in table D.15–6, the Tule Wind project alternatives are all still mainly Class I risks.

Stated in Impact TULE-FF-2: "The presence of over 100 wind turbines, electrical transmission lines, and overhead collectors presents an ongoing source of

potential wildfire ignitions adjacent to wildland fuels.… Overhead transmission lines present an ongoing source of potential wildfire ignitions for the life of the project.… the presence of the project would significantly increase the likelihood of a catastrophic wildfire." And stated in Impact TULE-FF-3: "Despite the potential for increased firefighting access, the presence of turbines and overhead transmission lines affects firefighting operations, increases risk to firefighters, and has the potential for delaying initial attack capabilities." Our communities do not possess the ability to fight a catastrophic wildfire. The Fire Safe Council believes that any further risks to causing catastrophic wildfires should be prevented.

Stated in D.15.5.5 Tule Wind Alternative 5, Reduction in Turbines Environmental Setting/Affected Environment: "Under this alternative the proposed Tule Wind project would be the same as that described in section B of this EIR/EIS with the exception that this alternative would remove specific turbine locations." Removing these turbines does not significantly decrease the fire danger. The project would still be considered Class I.

Stated in Impact ESJ-FF-3: "The undergrounding of transmission lines included in this alternative eliminates overhead transmission lines as a source of conflict with both aerial and ground-based firefighting efforts. Under CEQA, for this alternative, impact ESJ–FF–3 is considered less than significant (Class III)." This is the alternative the Fire Safe Council recommends.

The Fire Safe Council also approves D.15.7.3 No Project Alternative 3 – No Tule Wind Project and D.15.7.4 No Project Alternative – no ESJ Gen-Tie project. The Tule Wind Project's fire plan is flawed and only has one signature from a fire official. Overall, the project puts the communities in more danger in an already highly wildfire potential area. The benefits the project could yield to the communities do not exceed the risk the communities are being put in.

Stated in table D. 15–8: "During Red Flag Warning events, as issued daily by the National Weather Service and state responsibility areas of (SRAs) and local responsibility areas (LRA), and when the U.S. Forest service (USFS) Project Activity Level (PAL) is Very High on the Cleveland National Forest (CNS) (as appropriate), all construction and maintenance activities shall cease." The construction and maintenance activities should cease any time the winds are strong and not just during Red Flag Warnings.

Stated in table D. 15 – 8 Mitigation Measure: "FF–6: Funding for FireSafe Council. Provide funding for locally-based Fire Safe Council (E.G., Campo/Lake

Moreno FireSafe Council) to prepare implement a Community Wildfire Protection Plan. The funding will be determined in conjunction with local fire authority's input, the specified fuel reduction project priorities identified by the FireSafe Council, and in consideration the funding amount provided under Mitigation Measure FF–3." Fire Safe Councils are run by volunteers and cannot be depended on for continuing to provide fire prevention methods. Also the funding must be given to the appropriate Fire Safe Councils in the affected communities.

Stated in D.15.9 Residual Effects: "… present a potential obstacle for normal firefighting operations and strategies and even with training, firefighting effectiveness will be reduced by the presence of these facilities over a long time frame. Under CEQA, the following impacts be significant and cannot be mitigated to a level that is considered less than significant; therefore, impacts would yield residual effects."

Stated in table D. 15 –9 Significant and Unmitigable impacts: It is stated in this table that one of the greatest impacts are the overhead transmission lines. The Fire Safe Council requests that all overhead transmission lines be undergrounded. This will greatly reduce the fire danger and impacts on our area. It will also enable the firefighting agencies to fight the fires more effectively.

The Boulevard/Jacumba/La Posta Fire Safe Council's recommendation is that the projects either underground all overhead transmission lines or that there be no projects. Undergrounding the transmission lines will increase the safety of all three of our communities. Some of the eliminated impacts would be extra fire danger, visual impacts, noise impacts, accidents, helicopter impacts, environmental impacts, and less environmental footprint. Due to the impacts of these projects, appropriate amounts of mitigation will need to be taken in regards to fire safety.

The Boulevard/Jacumba/La Posta fire safe Council recommends of the following mitigation.

All Fire Departments in the communities of Boulevard, Jacumba, and La Posta need to have paid 4-0 staffing with supplemental local volunteer reservists, on a 24 hours, seven day a week, year round basis. The firefighting staff for these communities must be fully trained to cope with electrical, turbine, and other irregular fires and hazards.

Since the communities' only form of communication are telephones and cell phones, HAM radio operators must be trained and available in all communities. If the power should go out, the community members' telephones will not work. Cell phones have limited coverage in this area and interference with Mexican cell

towers so they are not reliable. The equipment for the Ham radios and the generators to run the radios must be provided. In alert system, such as the reverse 911, needs to be available in all three communities in working order even when the power is out.

In all three communities, the Fire Departments must be provided with generators and the equipment to fight the fires.

The communities of Boulevard and La Posta depend on wells for their water, storage tanks for water need to be supplied for the community members' usage. Water needs to be kept in storage tanks. This water could be used for both fire suppression and potable water. Community members with livestock must have water available for their livestock. This water must be easily portable, stored on location, or delivered to these community members.

All three communities need a working evacuation plan. This evacuation plan must include a working plan for use of the roads during an evacuation. There must also be evacuation centers set up for both community members and their livestock. This is especially important during the construction phase of these projects. The construction phase of these projects will increase the traffic in these communities. The only roads accessible in these communities are two-lane roads. There are nine possible projects in the Boulevard/Jacumba/La Posta area. This will increase the communities' frequency of traffic collisions or accidents.

These projects must either guarantee that there will be no increase to the local residents' insurance costs or that they will either cover or provide the increase of these insurance costs.

All three communities require uninterrupted electrical service throughout the construction and maintenance of these projects. All three communities also require uninterrupted electrical service during high winds.

The local schools should be provided with education on safety and evacuation methods.

Our local fire departments call values will increase during the construction and life the projects, due to the increased amount of activity, people, and traffic.

Due to BLM opening for industry, there are more potential projects that could be added and therefore more potential impacts.

All funding for local Fire Departments and Fire Safe Councils should be provided by these projects, for the life and construction of the projects.

The Boulevard/Jacumba/La Posta Fire Safe Council requests that all of the above items listed as potential dangers and all listed mitigation be taken into deep consideration. The communities we represent are being deeply affected by these

projects. As the local Fire Safe Council, our concerns rest with our community members and keeping them safe from all possible fire dangers.

Boulevard/Jacumba/La Posta President, Kenneth Daubach

Boulevard/Jacumba/La Posta Vice-President, Robert Price