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February 28, 2011

County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

Attn: Patrick Brown, Project Planner

RE: Tule Wind Project/EC Substation/ESJ US GEN-TIE Draft EIR and Tule Wind Project Fire Protection Plan
Bureau of Land Management / CAL FIRE / San Diego Rural Fire Protection District / San Diego County Fire Authority
Draft EIR Comments
Tule Wind Project Fire Protection Plan—Accepted

Please review the following comments regarding fire protection for the above project:

We have reviewed the section 15 of the Draft EIR (DEIR) prepared by DUDEK, dated December 2010. The DEIR was prepared for the Tule Wind, ECO Substation, and ESJ US Gen-Tie projects. In conjunction, we have reviewed the revised fire protection plan, dated February, 2011(received February 25, 2011), and prepared by RC Biological, Inc. for the Tule Wind Project.

PROJECT SUMMARY

The Tule Wind Project proposes to install up to 134 wind turbines, ranging in size between 328 and 492 feet in height, a collector substation and operation and maintenance building, a 34.5 kV overhead and underground collector cable system, and a 138 kV overhead transmission line to the proposed rebuild of the Boulevard Substation. The majority of the project will be located on lands managed by the Bureau of Land Management, whereas some portions of the project will be on Tribal, State and privately-owned lands. The portions of the project that are within privately-owned lands fall within the jurisdiction of the San Diego County Fire Authority (SDCFA) and the San

Diego Rural Fire Protection District (SDRFPD).

The ECO Substation Project proposes to construct a 500/230/138-kilovolt (kV) substation approximately 3 miles east of Jacumba, a short loop-in to the existing SWPL transmission line, construction of an approximately 13.3 mile-long 138 kV aboveground transmission line from the proposed ECO Substation to the rebuilt Boulevard Substation, and the rebuild of the Boulevard Substation. The majority of the project will be located on privately-owned lands within the jurisdictions of the SDCFA and the SDRFPD, with approximately 1.75 miles of transmission lines traversing over BLM-managed lands.

The ESJ Gen-Tie Project proposes to construct a 2 mile long single-circuit 500 kV line or a double-circuit 230 kV line from the proposed ECO Substation into Mexico. Approximately 2/3 of a mile of the proposed transmission line would be within the U.S., all of which would be within the jurisdiction of the SDRFPD.

SIGNIFICANCE CONCLUSIONS OF IMPACT FF-2 DISCUSION

The Draft EIR denotes on page D.15-56 that despite the implementation of the proposed mitigation measures FF-1 through FF-5, Impact FF-2 "remains adverse due to the impact created by the presence of the wind turbine facility and the corresponding increase in the probability of a wildfire. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I)."
Many meetings and discussions have been held between Iberdrola Renewables, SDCFA, CAL FIRE and SDRFPD with the goal of reducing the risk of a wildfire being caused by the projects, and mitigating the impacts if a wildfire were to occur. These meetings and discussions resulted in the development of an extensive array of Project Design Features (PDFs) and mitigation measures which we believe reduce the impact of the projects to a level below significance (Class II).

Some of the proposed PDFs that would reduce the risk of a wildfire include the following:

- The nacelle housing and turbine blades would be constructed of non-combustible or difficult to ignite materials.
- The turbines would be monitored at all times with the ability to power down the turbines at the first sign of trouble.
- The lubricant oils for the turbines would be non-combustible or have a high flash point.
- The turbine in the nacelle and the associated electrical equipment would be equipped with an automatic fire extinguishing system.
- Electrical equipment associated with the turbines would be protected with arc flash mitigation relays, which greatly reduce severity of a flash should an electrical malfunction occur.
- Ongoing hazard/fire safety training for all staff.

- Provision of two Type-6 inserts in pick-up trucks to be used as an industrial fire brigade for the project site. Staff would be trained in basic wildland fire techniques.
- Combustible vegetation would be modified per County Fire Code standards in an area of 100 feet around all turbines and structures and 30 feet along all roadways.
- The majority of 34.kV collector lines would be installed underground.
- On-site personnel and personnel at IBR's command center would have contact names and phone numbers of emergency personnel in the event of an emergency.
- Five water storage tanks for fire suppression would be provided at locations throughout the project.

In addition to addressing onsite project design features, there was much discussion on how to mitigate offsite impacts if a wildfire were to occur as a result of the project. If a wildfire were to start as a result of a fire in the nacelle of a turbine or from downed high voltage power lines, the fire could run for 40+ miles to the west through vegetation—some of which has no burn history, and much of which has not burned in 40 years since the Laguna Fire of 1970—threatening the communities and cities in the East and Southeast County. The vast majority of land between the proposed project and developed communities is classified as a Very High Fire Severity Zone—as determined by CAL FIRE FRAP mapping—and is steep in topography with very limited fire department access. The Laguna Fire of 1970 originated 5 miles west of the northwestern edge of the proposed Tule Wind Farm project and burned to the eastern edges of El Cajon and Spring Valley, consuming 190,000 acres, destroying 382 structures and causing the deaths of 5 people.

Today, there are approximately 16,860 homes located within the adjacent continuous fuel bed, and if a wildfire were to occur, the results could be catastrophic. However, this baseline risk exists today without the proposed project. The project is proposing additional mitigation to address this current baseline risk. One of the many lessons learned from the 2003 and 2007 wildfires in San Diego is that structures with adequate defensible space have a much greater chance of surviving a wildfire. Furthermore, in SDCFA's experience, when fire code inspections result in the issuance of a notice of violation for failure to maintain proper defensible space, property owners correct the violation approximately 80% of the time. After a second notice, but before abatement proceedings are begun, 98% to 99% of property owners correct the violation. Consequently, code inspections are an effective tool for reducing the risk of loss from wildfires.

One of the mitigation measures being proposed would significantly increase the SDCFA's ability to conduct defensible space inspections, and if necessary, abatement of the hazard. The project would provide proportional funding for a permanent, full-time Fire Code Specialist II position at the SDCFA. The person filling this position would do inspections of the homes for compliance with defensible space requirements.

Additionally, the project would provide proportional funding for four part-time reserve and/or volunteers to perform defensible space inspections for up to 90 days a year. The funding for the additional staffing would allow the SDCFA to perform approximately 6,000 additional defensible space inspections every year. These mitigation measures would significantly reduce the baseline fire risk and would offset any additional risk of wildfire posed by the proposed project. These mitigation measures would also provide a mechanism for addressing cumulative risk of future wind projects in the vicinity, such as the Padoma, Manzanita and Campo wind projects studied at the programmatic level in the Draft EIR.

The cost for the Fire Code Specialist II position is about $120,000 per year in 2011. The cost for the four part-time positions for 90 days is about $18,000 per year in 2011. The funding should be provided by each applicant to the SDCFA through their respective Development Agreements which must be executed prior to construction of any part of the project.

MM FF-4 TULE WIND PROJECT FIRE PROTECTION PLAN

We reviewed the revised fire protection plan, dated February, 2011, prepared by RC Biological Consulting, Inc. for the Tule Wind Project. The FPP has offered additional onsite and offsite mitigation in addition to the considerable number of project design features previously proposed. We agree with the FPP conclusion that the project's impacts have been reduced to a level below significance and, therefore, we accepted the fire protection plan for the Tule Wind Project.

Additional clarification on the following items is requested:

There are many inconsistencies between the Applicant Proposed Measures (APMs) in the DEIR and the Mitigation Measures (MMs) in the Fire Protection Plan accepted by the SDCFA. These discrepancies should be resolved.

MM FF-1 is a deferred submittal, but is offered as mitigation. By deferring preparation of the plan, we cannot evaluate the effectiveness of the proposed mitigation. This plan should be submitted concurrently with the DEIR either as an attachment or separate submittal.

MM FF-3 is to provide development agreements for the projects with the SDRFPD and the SDCFA. To date, only the Tule Wind Farm project has entered into a development agreement with the SDRFPD, and Tule Wind Farm is in the process of creating an agreement with the SDCFA. The ECO Substation Project and the ESJ Gen-Tie Project have not made progress in creating development agreements.

MM FF-4 is to create a customized fire protection plan for the project. To this date, no fire protection plan has been submitted for the ECO Substation Project.

Pages D.14-22 & 23 stipulates that all three projects comply with the travel time requirements of the County General Plan. Unmanned electrical generation facilities and

transmission lines usually are not evaluated for compliance with this General Plan requirement. Both the ECO Substation and the Boulevard Substation are on County lands, and their locations comply with the travel time requirements of the General Plan. The project is located in a Rural Land Use Category and the General Plan allows a maximum travel time of 20 minutes from the nearest responding fire station to the development. The Operations & Maintenance Building for the Tule project would be approximately 26 minutes travel time from the nearest responding agency. However, given that the Operations & Maintenance Building being proposed would be on BLM land, it is not subject to the General Plan. If the building were to be relocated on private property, it would need to be located in an area within 20 minutes travel time. The proposed General Plan Update recommends the area adjacent the proposed location of the Operations & Maintenance Building to be categorized to a land use that would allow a travel time of greater than 20 minutes. Thus the location of the Operations & Maintenance Building as proposed would comply with the General Plan Update.

Page D.15-48, second paragraph states "Wind turbines in California annually result in 35 turbine generator related fires (IAEI 2010)". Research conducted by Iberdrola Renewables has found the source of the information cited in the article to be unsubstantiated. We agree with Iberdrola Renewables and this sentence should be removed.

Page D.15-54 notes the Tule Wind Project "would result in potential ignition sources adjacent to wildland fuels in an area with a history of wildfires and over 2,000 inhabited structures in the vicinity". This sentence dramatically understates the baseline risk. The project would be located within a very large continuous bed of old combustible vegetation where there are now approximately 16,860 homes and steep topography with very limited fire department access.

Best regards,

James Pine, Fire Marshal
San Diego County Fire Authority
Public Safety Group

cc: via email:
CAL FIRE Howard Windsor
Kathleen Edwards
San Diego Rural Fire Protection District, Dave Nissen
Mark Mead
William Johnson
Ralph Steinhoff
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