

Comment Set A0037 California Department of Forestry and Fire Protection

STATE OF CALIFORNIA - THE RESOURCES AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF FORESTRY AND FIRE PROTECTION

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To: Aspen Environmental
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Subject: CAL FIRE Comments on Sunrise Powerlink Draft EIR

The following comments are from Chris Wurzell, Division Chief of Information, Education and Engineering at CAL FIRE. "Introducing electrical transmission lines into the wildland adds to potential ignition sources that can ignite wildland fires. These risks are reduced by ensuring that the tower structures, support components and conductors are engineered to minimize all structural failures and that an adequate fuels management reduction plan is developed and maintained. From a fire control viewpoint the transmission line that parallels I-8 on the proposed southern route of the Sunrise Powerlink Transmission project will constitute a hazard to fire suppression crews attacking fires near the transmission lines. This risk will have to be minimized in the fire attack planning process of any fire near the transmission lines."

The following are also comments from Thomas Porter, Staff Chief Resource Management at CAL FIRE. "Wildfire management concerns include firefighter safety when fire is burning in close proximity to transmission lines. Smoke can cause line to ground arcing and can cause new fires or electrocution. It is common practice to back firefighters well away from transmission lines where active fire is occurring. These defensive tactics often allow a fire to increase in size and potentially difficulty to control as firefighters take "indirect" action. "Direct" action is often safer and more effective, but not advised under energized transmission lines with a smoky fire. Likewise retardant and water dropped from aerial firefighting assets can cause line to ground arcing. Therefore, aerial firefighting assets avoid dropping on transmission lines. Again, this can allow a fire to grow unchecked. All of these issues are dealt with on a daily basis along the existing Southwest Powerlink along the US/Mexican Border in Southeastern San Diego County. Speaking specifically on the new line (Sunrise Powerlink), while it is not likely that the 500kv lines will cause fire ignition, they may however allow for fire to

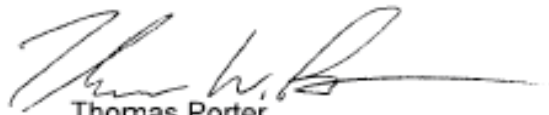
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grow to a larger size thus becoming more resistant to control. Also, if two sets of 500kv lines were located in close proximity to each other, there might be an area between them that would be inaccessible to firefighting resources. This scenario could allow for even further unchecked fire growth. These comments are aimed at issues relating to co-location of the new transmission corridor in the south county near the existing Southwest Powerlink. Regarding natural resource management issues, I reaffirmed that the utility company is required to meet all requirements of Title 14 of the PRC, and the intent of the California FPA via the Forest Practice Rules. After careful review of the proposed routes, there is little affected timberland to be considered under the California FPA angle. In fact there is no commercially viable timber on State Responsibility Area along the proposed routes.

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Thomas Porter
Staff Chief
Resource Management
California South Region

LS:lmo

Responses to Comment Set A0037

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- A0037-1 The Wildfire Containment Conflict model used in the Draft EIR/EIS was developed in consultation with CAL FIRE and USFS (see Section D.15.4.3 of the Draft EIR/EIS), and Figures E.1.15-20 through E.1.15-23 show segments along the Interstate 8 alternative that would present a low, moderate, high, and very high conflict with firefighting operations. Three contiguous half mile segments represent a significant firefighting conflict. In summary, Section E.1.15 of the Draft EIR/EIS concurs with Chris Wurzell's comments.
- A0037-2 With regard to Thomas Porter's comments on the risk of collocation of the southern alternatives with the Southwest Powerlink on firefighting effectiveness, this issue was comprehensively evaluated in Attachment 1a to Appendix A of the Draft EIR/EIS, and it was concluded that southern route alternatives that are collocated with the SWPL east of Milepost 35 would be retained based on the low-risk fire history and patchy fuels in this area. The Wildfire Containment Conflict modeling presented in Section E.1.15 and Figure E.1.15-20 indicate no significant conflict with firefighting operations along the collocated portion of the Interstate 8 Alternative route.