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Patrick Brown  
Via email

January 10, 2011

RE: Summary of Rationale for Significance Determinations within the Fire Protection Plan for the Tule Wind Project; MUP 3300-09-019, ER No. 3910-1000001

Dear Mr. Brown,

Per your request, this letter summarizes the rationale for the significance determinations reached in the Fire Protection Plan (FPP) for the Tule Wind Project. A revised version was approved by the San Diego Rural Fire Protection District (SDRFPD) on November 3, 2010. The primary change of significance in the revised version approved by the SDRFPD is the commitment by Iberdola to have automatic fire suppression systems within the turbine nacelle.

California Environmental Quality Act (CEQA) Baseline - The project is proposed in an area that is mapped as a high fire hazard area, moderate to steep terrain, average high wind speeds and vegetation cover that ranges from sparse to having a high fuel load. This is the baseline condition of the project area, against which the project's impacts are measured. The project itself is not responsible for mitigating the baseline conditions pursuant to CEQA.

CEQA/County Thresholds of Significance - The following questions come from the County's Significance Guidelines for Fire Protection Plans. The responses summarize the rationale in the SDRFPD-approved FPP, which concluded that applied project design features (PDFs) and mitigation measures (MMs) have reduced all potentially significant impacts to a level less than significant.

**Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

The project introduces the possibility of a wildland fire ignition from various components/phases of the project, including construction activities, collection and transmission lines, wind turbines, and operations and maintenance activities. Numerous PDFs and MMs have been proposed to minimize the potential for an ignition, including automatic fire suppression systems in the wind turbine nacelle(s), various design features such as arc flash relays, fuel management around project features (i.e., 100' clearance around turbines with fire-safe vegetation and annual fuel management), five (5) 10,000 gallon water storage tanks installed throughout the project area that can be utilized for regional fire suppression support, training of both construction and operational personnel, provide training to Firefighters on an ongoing basis as to the facility and electrical hazards and handling of such emergencies on site, both new and improved access roads through an area that currently does not have improved access, and funding for both the SDCFA and the SDRFPD. Not only has the project minimized the risk of a potential ignition resulting from the project, but it will also improve access and response time and provide water for wildland firefighting within the large expanse of BLM lands that do not currently have access or water but contain the baseline conditions that make the area a high fire hazard area.

For the project to result in a SIGNIFICANT risk, an ignition from the project would have to occur during severe fire weather (high winds, high temperatures, low humidity) and not be contained during the initial attack. Initial attack means the first attack on the fire. The number of resources sent on the first dispatch to a wildfire depends upon the location of the fire, the fuels in the area (vegetation, timber, homes, etc) and current weather conditions. Most fires are caught within the first burn period (the first two hours). Therefore, the vast majority of the fires CAL FIRE responds to are considered initial attack fires ([http://www.fire.ca.gov/communications/downloads/fact\\_sheets/FireTerminology.pdf](http://www.fire.ca.gov/communications/downloads/fact_sheets/FireTerminology.pdf)). The CALFIRE San Diego Unit states that Statewide, CALFIRE can hold 90-95% of all wildland fires in its response jurisdiction (SRA) to 10 acres or less which they consider contained within the initial attack (pers.comm Jim Hunt and Chief Nick Schuler).

The project is providing fire suppression (wind turbine nacelle and in the operations & maintenance facility), improved area access, water to support regional fire suppression, and funding that will increase the probability of containment. The low potential for an ignition from the project to occur during severe fire weather and not being contained by one of the PDFs and/or MMs, or doing the initial attack, results in a less than significant risk when measured against the baseline conditions. This conclusion is based on the implementation of the design features and mitigation measures proposed within the FPP.

**Would the project result in inadequate emergency access?**

The project will significantly improve access within the large expanse of BLM lands that currently have no vehicle access. The project is proposing new roads and improving existing roads, including the implementation of fuel management adjacent to the roads. Additionally, in order to ensure firefighter safety, the transmission line and above-ground collector lines shall be de-energized prior to and during fire suppression activities within 1 mile of the project corridor to maintain firefighter safety, and re-energizing shall require notification and approval of all the responsible fire agencies. This mitigation measure ensures firefighter safety, and is in addition to the training fire personnel already receive in how to work safely in the presence of downed electrical lines. Based on these factors, when compared against the baseline conditions in the project area, the proposed project will not adversely affect emergency access in the project area. For the reasons identified above, the project actually improves emergency access in the project area.

**Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios, or other performance objectives for fire protection?**

The County of San Diego has not identified a need for new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance service ratios, or performance objectives as a result of the project. The project will enter into a Fire and Emergency Protection Services Agreement with the SDCFA, and has already entered into such an agreement with the SDRFPD. The purpose of these agreements are to provide private funding to the SDCFA and SDRFPD to assist with implementation of fire and emergency services in the project area. Furthermore, the project meets County response times to all project features within the County's jurisdiction. The project will not result in a substantial adverse physical impact which could cause significant environmental impacts.

**Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

The project has identified sufficient groundwater supplies to meet the peak construction and operational demand. Water for the O&M building will be provided by a well and a storage tank within the O&M site. No new or expanded entitlements are needed.

**Section 4.0 of the County Guidelines for Determining Significance states that an affirmative response to any of the following three guidelines will generally be considered a significant impact related to wildland fire.**

- 1. The project cannot demonstrate compliance with all applicable fire codes.**
- 2. A comprehensive fire protection plan has been accepted and the project is inconsistent with its recommendations.**
- 3. The project does not meet the emergency response objectives identified in the Public Facilities Element of the County General Plan or offer feasible alternatives that achieve comparable emergency response objectives.**

The project does not result in an affirmative answer to any of the three guidelines. The project is in compliance with all applicable fire codes (Question #1), and meets the emergency response objectives of the Public Facilities Element of the County General Plan (Question #3). Although the County has not yet accepted the Fire Protection Plan (Question #2), at this time, based on meetings and discussion with the County Department of Planning and Land Use (DPLU) and SDCFA, it appears the County is in agreement with the proposed PDFs and MMs in the report based on the October 25, 2010 comment letter from the County and our meeting on December 22, 2010. At this time, the County has not identified or requested any additional PDFs, MMs, or project redesign to address wildland fire risk. Accordingly, the project will be consistent with the Fire Protection Plan's recommendations.

I look forward to discussing the project at your earliest convenience, and am generally available to meet with you and SDCFA personnel, except the week of January 17-21 when I will be in the field. If you have any questions please do not hesitate to call.

Sincerely,

  
Robin Church  
Principal