

## Lauren Coartney

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**From:** Edwards, Kathleen <Kathleen.Edwards@fire.ca.gov>  
**Sent:** Friday, March 04, 2011 4:52 PM  
**To:** ECOSUB  
**Cc:** Windsor, Howard; Porter, Thomas; Garrett, Jim  
**Subject:** CAL FIRE Comments for the SDG&E East County - Tule Wind Projects

Iain Fisher, CPUC, and Greg Thomsen, BLM:

It is my understanding today is the close of the comment period for the DEIR/EIS and FPP for the Tule Wind Project. The following bullets are a summary of the comments that will be fully developed and submitted to your organizations within the next week.

Reference 1: Draft Environmental Impact Report/Environmental Impact Statement for the SDG&E East County Substation Project, Pacific Wind Development Tule Wind Project, and Energia Sierra Juarez U.S. Transmission, LLC, Energia Sierra Juarez Gen-Tie Project

Issue Date: December 2010

SCH No. 20091210790  
DOI Control No. DES 10-62  
East County Substation Project No. DOI-BLM-CA-D070-2010-0027-EIS  
Tule Wind Project No. DOI-BLM-CA-D070-2008-0040-EIS

Reference 2: Fire Protection Plan for the Tule Wind Project, County of San Diego

Issue Date: February 2011

Major Use Permit Application Number: MUP 3300-09-019  
Environmental Review Number: 3910-1000001

Comment to the EIS/EIR, Section 15 – Fire and Fuels and the Fire Protection Plan for the Tule Wind Project

- Remove references to CCR Title 14, Forest Practice Rules, Article 8, Rule #918 Fire Protection
  - The reference is not accurate – “applies to all vegetation operations in SRAs”. The reference is applicable for timber harvesting operations related to Z’berg-Nejedly Forest Practice Act of 1973 and other associated laws. (See Title 14, CCR, Chapters 4, Chapter 4, Section 896 General). For the correct reference see the next bullet.
- Add reference to these applicable codes sections below, as they are applicable for both the construction phase of the proposed project and for the long-term operational and maintenance of the proposed projects as well: California Public Resources Code (PRC) – Division 4, Chapter 6:
  - Section 4427 – Operation of Fire causing equipment
  - Section 4428 – Use of Hydrocarbon powered engines near forest, brush, or grass covered lands without maintaining firefighting tools
  - Section 4431 – Gasoline powered saws, etc.; firefighting equipment
  - Section 4442 – Spark arresters or fire prevention measures; requirements; exemptions
- Update the reference from the “California Fire Plan” to “2010 Strategic Fire Plan” – see the <http://cdfdata.fire.ca.gov/pub/fireplan/fpupload/fpppdf668.pdf>
- Regarding the CAL FIRE Fire Safety Inspection Program, remove the reference to the CAL FIRE form number “LE-38”. While the current form number/identifier is LE-100, the department is reviewing/updating this form and may opt to revise/update the form number as well.
- CAL FIRE Cost Recovery Program – While the examples reference cases related to the non-compliance with vegetation clearance requirements, these types of non-compliance violation are not the only conditions in which the department may seek cost recovery. See the PRC references above, as they provide direction regarding clearance during operations, fire fighting tools, and spark arrestors.

- If in the event that the proposed deviates from the proposed area and realigns onto forested landscapes then a Registered Professional Forester may be required to review/approve the vegetation management plan. (PRC 750-783, Professional Foresters Law).
- Update the reference of the Red Flag Alert to Red Flag Warnings & Fire Weather Watches
  - The National Weather Service issues Red Flag Warnings & Fire Weather Watches to alert fire departments of the onset, or possible onset, of critical weather and dry conditions that could lead to rapid or dramatic increases in wildfire activity.

A Red Flag Warning is issued for weather events which may result in extreme fire behavior that will occur within 24 hours. A Fire Weather Watch is issued when weather conditions could exist in the next 12-72 hours. A Red Flag Warning is the highest alert. During these times extreme caution is urged by all residents, because a simple spark can cause a major wildfire. A Fire Weather Watch is one level below a warning, but fire danger is still high.

- CAL FIRE request additional time needed to fully complete the review of the DEIR/DEIS and the FPP.

Thank you for the opportunity to provide comments to these environmental review documents.

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