Comment Set A0037 California Department of Forestry and Fire Protection

STATE OF CALIFORNIA - THE RESOURCES AGENCY

ARNOLD SCHWARZENEGGER, Governor

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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 500ky 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

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