

APPENDIX 9.1-5

Supplemental Fire Protection Analysis

TECHNICAL MEMORANDUM

To: Jacumba Solar LLC
From: Michael Huff, Principal Fire Protection Planner
Subject: Supplemental Fire Protection Analysis
Date: July 21, 2015

1.0 INTRODUCTION

This memorandum provides information regarding decommissioning impacts. During the public review comment period for the Draft EIR, public comments were received seeking clarification regarding secondary impacts that may occur from the implementation of the mitigation measure M-AE-3 to decommission the solar facility. Dudek provides the following analysis of that activity as practiced by fire protection planners in San Diego County. This analysis does not change the conclusions regarding the level of significance of the prior analysis in the Draft EIR and the Fire Protection Plan included as Appendix 2.4-2. This memorandum analyzes the potential of implementing M-AE-3 to have a significant environmental impact related to hazards, specifically fire and emergency response, and concludes that it would be consistent with the conclusions of the Draft EIR prepared and circulated for the development of the Proposed Project. Removal of batteries will occur according to battery manufacturer's recommendations to avoid mechanical damage and potential thermal events. Batteries will not be stored on site outside of their storage containers during the decommissioning process. The nature of the materials in the components such as batteries and inverters means that they would need to be disposed of in a regulated disposal facility.

2.0 REGULATORY SETTING

The regulatory setting remains as established in Section 2.4 of the Draft EIR and the Fire Protection Plan (Appendix 2.4-2 of the Draft EIR).

3.0 ANALYSIS

Decommissioning Impacts

As stated in Chapter 1, Project Description of the Draft EIR, the expected lifespan of the Proposed Project is estimated to be at least 30 years. Mitigation measure M-AE-3 requires decommissioning of the solar facility to reduce aesthetics impacts.

In actuality the likelihood of risk for igniting or exposure to wildfires during decommissioning activities would be substantially reduced compared to construction as the activities during construction would include clearing brush and direct contact of equipment and potential fuel (brush), while during decommissioning the ground would be disturbed and graded with solar installed components, as well as a cleared fire/brush management area surrounding the facility and decommissioning activities. There is though still the potential for ignition from equipment in proximity to brush and for wildfires to spread into the proximity of decommissioning activities. As such the potential wildfire impacts would be **potentially significant** and Construction Fire Protection Plan will also be implemented for decommissioning activities and mitigation measure M-MZ-1 will be required of decommissioning as well as construction activities. Implementation of the mitigation measure (M-HZ-1) will reduce the impact to **less than significant**.

The potential impacts associated with Emergency Medical Services (EMS) responses during decommissioning are provided for in the mitigation measure M-HZ-2, which as prescribed in Section 2.4 Hazards and Hazardous Materials of the Draft EIR is applicable to decommissioning as well as construction. Therefore, the analysis and mitigation provided in the Draft EIR and Appendix 2.4-2 Fire Protection Plan, adequately addresses the decommissioning activities in terms of emergency services.

4.0 CONCLUSIONS

Decommissioning activities would be expected to result in less risk of ignition and exposure than during construction. However, for the purposes of a conservative analysis, as with the construction analysis, impacts from project decommissioning are considered **potentially significant** and the Construction Fire Protection Plan as outlined in mitigation measure M-HZ-1 is required to apply to decommissioning activities.



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