

### GR-7 Fire Protection Services and Wildfire Impacts

This Global Response addresses the following fire protection services and wildfire-related comment topics:

- Fire protection plans
- Emergency response and access
- Aerial firefighting
- Firefighting resources (ground)
- Wildfire ignition

#### Fire Protection Plans

A number of commenters stated that implementation of the Campo Wind Project with Boulder Brush Facilities (Project), in addition to other cumulative wind energy projects, would result in an increase in wildfire risks within the area and would therefore require an increase in firefighting resources. Chapter 2.5, Hazards and Hazardous Materials, and Chapter 2.9, Wildfire, in the Draft Environmental Impact Report (EIR) analyze potential wildfire impacts resulting from construction, operation, and decommissioning of the Project. In support of this analysis, technical reports specific to the Project were prepared, including the Boulder Brush Facilities Fire Protection Plan (FPP) (Appendix I to the Draft EIR), the Boulder Brush Facilities Construction Fire Prevention Plan (CFPP) (Appendix A of Appendix I to the Draft EIR), and the Boulder Brush Facilities Technical Report for Fire Personnel (Appendix H of Appendix I to the Draft EIR).

As analyzed in Chapters 2.5 and 2.9 of the Draft EIR, the Project could potentially create wildfire risk during construction, operation, and decommissioning activities due to increased activity and ignition sources. However, with implementation of the Boulder Brush Facilities FPP (mitigation measure **M-WF-1**) and an FPP prepared to the satisfaction of the Campo Reservation Fire Protection District (CRFPD) for the Campo Wind Facilities (**M-BI-C[h]**), impacts would be less than significant because the FPPs would ensure compliance with applicable fire codes and wildfire-related regulations, which would adequately protect against fire risk and wildfire impacts of the Project.

As described in Chapter 2.9 of the Draft EIR, **M-WF-1** shall be required of the Boulder Brush Facilities as part of the County of San Diego (County) Major Use Permit approval to address wildfire risks associated with implementation of the Boulder Brush Facilities. The Boulder Brush Facilities FPP and Fire Services Agreement must be approved by the County as part of the permitting process for the Boulder Brush Facilities. The required Boulder Brush Facilities FPP was prepared to the satisfaction of the San Diego County Fire Authority (SDCFA), and the Boulder

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Brush Facilities would be required to comply with County Fire Code, in addition to the fire-related policies outlined in Section 2.9.2, Regulatory Setting, of the Draft EIR. These regulations require a permanent access road be constructed to provide access to the high-voltage substation and switchyard to allow adequate access for emergency services.

The Boulder Brush Facilities FPP incorporates applicable fire safety regulations that are consistent with the 2017 County Consolidated Fire Code and 2019 California Fire Code Ordinance (Section 49) and with the California Code of Regulations, Title 14, Fire Safe Regulations. The Boulder Brush Facilities FPP is also consistent with the County Diego Guidelines for Determining Significance and Report Format, Wildland Fire and Fire Protection (2010). Additionally, a CFPP (Appendix A of the Boulder Brush Facilities FPP [Appendix I to the Draft EIR]) is provided that identifies the standard protocols and approaches for reducing the potential for wildfire risk from typical construction site activities.

The Boulder Brush Facilities FPP also includes required measures and code-exceeding measures that would work together to result in reduced fire threat and heightened fire protection as a result of the Project. As outlined in Section 7 of the Boulder Brush Facilities FPP, such measures would include the following:

- A technical report indicating special precautions for firefighting response (see Appendix H to the Boulder Brush Facilities FPP for more details) (code-exceeding measure).
- Up to 30-foot wide primary access road that connects to the high-voltage substation and switchyard. 16-foot wide roads provide access to Off-Reservation gen-tie power line structures (required measure).
- Off-Reservation gen-tie power line poles would be non-combustible (steel) with lightning protection (code-exceeding measure).
- Participation in an agreement with SDCFA, for funding firefighting and emergency medical resources, the details of which will be determined in the Fire Service Developer Agreement (required measure).
- Boulder Brush Developer annual fuel modification zone inspections to ensure compliance with the FPP (code-exceeding measure).
- Motion sensor illuminated (and/or reflective) signage at main entrance (required measure).
- Preparation and implementation of a CFPP for the Boulder Brush Facilities (code-exceeding measure).
- Class B/C, 15-pound portable carbon dioxide (CO<sub>2</sub>) fire extinguishers mounted at high-voltage transformer units (required measure).

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- Three 10,000-gallon water tanks be installed near the switchyard and high-voltage substation dedicated for firefighting purposes (required measure).
- During construction, one pick-up truck would be outfitted with skid-mounted unit, including fire pump, hoses, and nozzle, and personnel properly trained to use the firefighting equipment. After construction is completed, the pickup truck will remain on the Project Site and personnel will be trained to use the firefighting equipment (required measure).
- Boulder Brush Facilities contact information with local fire agencies/stations to assist responding firefighters during an emergency (required measure).
- On-going maintenance of all facility components for the life of the Boulder Brush Facilities (required measure).
- Maintenance logs to be kept and made available upon request to SDCFA/CAL FIRE (required measure).
- Consistent placarding and labeling of all components for fire safety/response (required measure).

A separate FPP would be prepared for the Campo Wind Facilities to the satisfaction of the CRFPD, which is responsible for fire response on the Campo Band of Diegueño Mission Indians Reservation (Reservation). The Campo Wind Facilities FPP will outline fire protection measures for Campo Wind Facilities construction and operations, including emergency response. **M-BI-C(h)** is recommended in the Final Environmental Impact Statement, which would reduce impacts associated with the possibility of wildfires for the Campo Wind Facilities on the Reservation, and is required in the Bureau of Indian Affairs' Record of Decision. The Campo Wind Facilities FPP would be implemented in conjunction with development of the Project.

The Boulder Brush Facilities FPP would also be required to be implemented in conjunction with development of the Project. The purpose of the Boulder Brush Facilities FPP is to address potential adverse environmental effects that the Boulder Brush Facilities may have on or from wildfire. The Boulder Brush Facilities FPP assesses potential impacts resulting from wildfire hazards and identify measures necessary to adequately mitigate those potential impacts. Recommendations for effectively mitigating identified impacts are based on site-specific characteristics and incorporate input from the local fire jurisdiction.

### *Emergency Response and Access*

The Project's impact on emergency response and evacuation plans and post-fire impacts (post-fire erosion, flooding, or landslides) was determined to be less than significant. Please refer to the analysis in Section 2.9.3 of the Draft EIR.

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With respect to operation of the Boulder Brush Facilities, the proposed facilities would not restrict emergency access and new roads and proposed improvements to Ribbonwood Road would improve emergency vehicle access. A new paved access road would be constructed from the existing paved Ribbonwood Road through private land to the proposed high-voltage substation and switchyard. Implementation of the required and code-exceeding measures, including provision of three 10,000-gallon water tanks dedicated for firefighting purposes and appropriate fuel modification zones, would further improve firefighting capabilities.

With respect to operation of the Campo Wind Facilities, the proposed facilities would not restrict emergency access. New roads and proposed improvements to existing roads (such as portions of Tusil Road, Williams Road, and Kumeyaay Road) would improve emergency vehicle access. Implementation of the required measures, including provision of two 10,000-gallon water tanks dedicated for firefighting purposes at the operations and maintenance building and collector substation, appropriate fuel zone buffers, and an outfitted pickup truck, would further improve firefighting capabilities.

Furthermore, with implementation of a Construction Traffic Control Plan and required construction notification procedures, impacts to access for emergency responders in a wildfire hazard or event during the construction and decommissioning phases would be less than significant.

### *Aerial Firefighting*

Comments on the Draft EIR were received raising concerns regarding the Project's impacts to aerial firefighting. The turbines would be located on the Reservation and not within the jurisdiction of San Diego County. The gen-tie line would be located the Reservation and on private lands within the San Diego County jurisdiction.

It is anticipated that a combination of ground and aerial attack resources could be utilized for a wildfire event on the Project Site or in the vicinity. As with any vertical construction in San Diego County that could impact fire aviation, there are procedures to mitigate any potential hazards to California Department of Forestry and Fire Protection (CAL FIRE) helicopters and planes. Once a project has been approved for construction, the heights and exact locations are submitted to the CAL FIRE Chief that commands the San Diego County Aviation Division. Then, a request is made to the CAL FIRE San Bernardino offices to update the Aviation Hazard Map. The Aviation Hazard Map is entered into the navigational system and studied by pilots and controllers prior to construction. If the turbines are on the Aviation Hazard Map, then the potential hazard is minimized. Please also refer to Global Response GR-9 Aviation.

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### *Firefighting Resources (Ground)*

Regarding comments received related to firefighting resources, the demand for fire protection service related to the Project would not exceed the availability of services provided by the CRFPD or the SDCFA (Section 3.1.8, Public Services, of the Draft EIR).

Regarding comments specific to cumulative impacts, Section 6 of the Boulder Brush Facilities FPP (Appendix I to the Draft EIR), and Section 2.9.4 of the Draft EIR provide a detailed analysis on cumulative impacts as they relate to a fire incident in the area. As stated in Appendix I, the potential cumulative impacts from multiple projects in a specific area can cause fire response service decline and must be analyzed for each project. The Boulder Brush Facilities along with solar energy and/or other wind energy projects in the greater Boulevard/Jacumba region represent an increase in potential service demand along with challenges regarding rescue or firefighting within or adjacent to electrical facilities. For emergency response, the cumulative study area would be the SDCFA and/or CAL FIRE jurisdictional boundaries. Although the Project would not result in a substantial increase in the number of calls per year for fire service, the Project would contribute to the cumulative impact on fire services, when considered with other anticipated projects in the study area, which is considered a high wildfire risk location.

The Boulder Brush Developer would participate in a Fire Service Developer Agreement. As explained in Chapter 2.9 of the Draft EIR, Fire Service Developer Agreements ensure funding for firefighting and emergency medical resources to comply with General Plan Safety Element Policy S-6.3 for new development, which requires development projects to contribute fair-share funding toward fire services. Funding provided by projects result in capital that can be used toward firefighting and emergency response improvements so that the County's firefighting agencies are able to perform their mission into the future at levels consistent with the General Plan. Implementation of the Boulder Brush Facilities FPP and CFPP, project design features, and **M-WF-1** and **M-BI-C(h)** would reduce the Boulder Brush Facilities' proportionate share of wildfire risk impacts on a cumulative level, and the payment of fair-share fees would ensure consistency with County General Plan policies.

### *Wildfire Ignition*

Some comments received voiced concerns related to the Project's location in a Very High Fire Hazard Severity Zone, and previous instances of fires that were started by Pacific Gas & Electric high-voltage lines. Very High Fire Hazard Severity Zones require that proposed projects implement a variety of fire hardening and prevention measures, which are identified in the Boulder Brush Facilities FPP. For instance, the Project would provide defensible space through fuel modification zones around each gen-tie line pole, the high voltage substation, the switchyard, and roads. The Project would also include 24-hour surveillance by a combination of on-site workers

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and webcams proposed around the high-voltage substation and switchyard, anticipated to aid in earlier observation and reporting of fires. Overhead lines (normally smaller voltage distribution lines) have been responsible for igniting large wildfires in California. As a result, all electric utilities, including San Diego Gas & Electric, are now required to prepare comprehensive Wildfire Mitigation Plans that focus on where a utility's system may be vulnerable to igniting fires and how they are mitigating the potential for ignitions. Utility-caused fire ignitions are being minimized going forward through these extraordinary efforts. Please refer to Section 2.9.3.3 of the Draft EIR for a detailed analysis on the Project's infrastructure contribution to increased wildfire risk.

### Summary

As impacts to fire protection services and wildfire are accurately and sufficiently analyzed in the Draft EIR and supporting technical appendices, and comments regarding fire protection services and wildfire impacts did not raise new information not previously addressed in the Draft EIR or identify deficiencies in the Draft EIR analysis, no modifications to the Draft EIR fire protection services and wildfire analysis is warranted.