



City of Carlsbad

Office of the City Manager

December 2, 2008

DOCKET 07-AFC-6
DATE DEC 0 2 2008
RECD. DEC 0 5 2008

Mike Monasmith
Siting Project Manager
1516 Ninth Street, MS-15
Sacramento, CA 95814

RE: CITY OF CARLSBAD'S REVIEW OF NRG'S FIRE RISK AND
EMERGENCY RESPONSE ASSESSMENT REPORT/CECP (07-AFC-6)

Dear Mr. Monasmith:

On behalf of the City of Carlsbad, please find enclosed for docketing the City's response to NRG's (the Applicant) *Fire Risk and Emergency Response Assessment Report*.

If you have any questions, please feel free to contact me at (760) 434-2820.

Sincerely,

Joe Garuba
Municipal Projects Manager

JG:ad

Enclosure

cc: Proof of Service List (Rev. 11/19/2008; via email or U.S. Postal Service)
City Manager
Fire Chief



December 1, 2008

TO: MUNICIPAL PROJECTS MANAGER

FROM: Fire Marshal

REVIEW OF NRG/CH2MHILL FIRE RISK ASSESSMENT

I have had the opportunity to review the *Fire Risk and Emergency Response Assessment Report* dated November 7, 2008, which was submitted by NRG to the State. After reading that review, the following issues remain a fire and life safety concern:

Ability to Respond in a Large Seismic Event

The greatest concern that was raised with the State was our ability to provide fire and rescue services for an intensification or modification of a generation facility located west of Interstate 5 during a significant seismic event. These concerns were based on the following issues:

- We have no fire station located west of the freeway.
- All responding equipment from the Carlsbad Fire Department will be responding from locations that would require them to go under freeway overpasses that may not be passable.
- Responding equipment from our automatic aid partner agencies of Oceanside and Encinitas would be required to cross bridges over lagoons that are subject to liquefaction in a large seismic event. This would prevent them from being able to access the incident.
- Most of the responding equipment would still have to cross railroad tracks that could make passage impossible due to seismic damage.

Sufficiency of the Fire Response in a Normal Event

The NRG report addresses our ability to provide response by only two pieces of fire apparatus. While this level of response would be sufficient for a dumpster fire, small roadside grass fire or medical aid call, it would not be sufficient for a structure fire at an industrial facility. We are now subject to federal and state limitations on our ability to perform fire ground operations until a certain amount of equipment and manpower is available. A minimum industrial fire response to this facility should be three (3) engine companies, one (1) truck company, one (1) ambulance and one (1) chief officer. For any significant fire, the amount of resources required could be expected to double or even triple.

On any day, the Carlsbad Fire Department has an on-duty presence of five (5) engine companies, one (1) truck company, three (3) ambulances and one (1) battalion chief. This force is responsible for providing fire and life safety services to an area of over 42 square miles with an approximate population of 100,000. A first alarm assignment for an industrial fire at the NRG facility will require 60% of the available fire and life safety resources in the community.

New Emergency Access Route

The report contains references to a “new emergency access route that will allow emergency response equipment to enter the CECP site from Cannon Road via Avenida Encinas, thereby eliminating the need for emergency response equipment to cross the railroad tracks located west of I-5. This new emergency access route will be across SDG&E property using a prescriptive easement that is in place.” While the railroad tracks are certainly an issue in our day-to-day response to the facility, the addition of this route does not address the issue of our ability to get to the facility in a large seismic event when the responding equipment will still have to go under a freeway overpass or across lagoon bridges, that may not be passable for vehicle traffic.

Reliance on New Process Systems

The report makes significant reliance on the instillation of new process systems at the facility. The report’s assumptions that they reduce the overall risk of fire and explosion are correct. However, these systems do not eliminate the possibility of fire and explosion at the facility. Because of this, we are required to plan for, and be able to respond to an incident at the facility.

Safer Alternate Areas

The report does not address the sites within this City where none of our concerns are an issue. At these sites, the responding equipment would not be subject to the possibility of collapsed overpasses, impassable railroad tracks, and collapsed bridges over lagoons. In fact, at the other locations, fire department response would be enhanced because of their proximity to fire stations (both Carlsbad and mutual aid) on all sides of the facility.



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV

APPLICATION FOR CERTIFICATION
FOR THE **CARLSBAD ENERGY
CENTER PROJECT**

Docket No. 07-AFC-6
PROOF OF SERVICE
(Revised 11/19/2008)

INSTRUCTIONS: All parties shall 1) send an original signed document plus 12 copies OR 2) mail one original signed copy AND e-mail the document to the web address below, AND 3) all parties shall also send a printed OR electronic copy of the documents that shall include a proof of service declaration to each of the individuals on the proof of service:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 07-AFC-6
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DECLARATION OF SERVICE

I, Andrea Dykes, declare that on Dec. 3, 2008, I deposited copies of the attached document in the United States mail at Carlsbad, CA with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

OR

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

I declare under penalty of perjury that the foregoing is true and correct.


