



CITY OF
CARLSBAD
Fire Department

www.carlsbadca.gov

November 1, 2010

James D. Boyd, Presiding Member
Anthony Eggert, Associate Member
Carlsbad Siting Committee
California Energy Commission

Subject: Carlsbad Energy Center Project (07-AFC-6)

Dear Commissioners Boyd and Eggert:

As chief of the Carlsbad Fire Department ("CFD"), I'd like to express my appreciation to the staff of the California Energy Commission for recommending that a condition of certification be considered, as proposed in Staff's Reply Brief (Energy Commission Staff Reply Brief, Page 16, dated October 11, 2010) to help ensure safety at the proposed Carlsbad Energy Center Project (CECP). This proposed condition was clearly raised in response to concerns raised by CFD regarding the explosion on Feb. 7, 2010, at the Kleen Energy plant in Connecticut.

Staff's proposal to prohibit "gas blows" in venting natural-gas lines is, in our view, a sound first step in ensuring safety at the project, and we welcome it. As representatives of CFD have previously testified, the CFD has spent numerous hours studying the proposed plant's layout and configuration, and based on that analysis we have provided our best professional recommendation for the CECP, should it be built.

While CFD appreciates the recommendation, we would like to reiterate our overall concerns regarding worker and public safety at CECP. The CECP's constrained location between Interstate 5, the regional railroad tracks and Agua Hedionda Lagoon would present quite a challenge from an emergency-access perspective if an accident were to occur, and CFD has been quite vocal in the need to require an appropriate degree of emergency access. This is vital so emergency personnel can access the site in the event of an accident or catastrophe, stage operations and pass each other on safely sized roads. Unfortunately, the current plan, in our view, does not provide sufficient emergency access.

Fortunately, such dire events as the Kleen Energy explosion are rare. However, as was pointed out during the Evidentiary Hearings, accidents happen and they come in all shapes and sizes. We need look no farther than San Bruno to see that the unexpected can occur here in California, and when it does, the ability to respond quickly and perform rescues expeditiously is critical. That responsibility falls on the shoulders of the local fire, police and emergency responders.



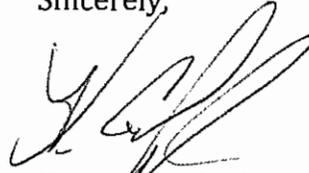
Fire Department

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Recognizing the constrained nature of the site and the close proximity of vital regional infrastructure, CFD respectfully requests the Commission to please take the next step by requiring fire-access roads that are 50 feet wide, an upper rim road 25 feet wide, and connection to the City's water supply for the on-site fire suppression system to assure the safety of plant workers and emergency responders.

If you have any questions, please don't hesitate to call me at (760) 931-2141.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kevin Crawford', written over a faint horizontal line.

Kevin Crawford
Carlsbad Fire Chief

c: See Proof of Service List



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 6/14/2010)

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DECLARATION OF SERVICE

I, Robin Nuschy, declare that on November 1, 2010 I served and filed copies of the attached Carlsbad Fire Dept. Response to CEC proposed conditions dated Nov 1, 2010. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: [<http://www.energy.ca.gov/sitingcases/carlsbad/index.html>]. The document has been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(Check all that Apply)

For service to all other parties:

- sent electronically to all email addresses on the Proof of Service list;
- by personal delivery;
- by delivering on this date, for mailing with the United States Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses **NOT** marked "email preferred."

AND

For filing with the Energy Commission:

- sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (preferred method);

OR

- depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 07-AFC-6
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.

