

CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512

September 30, 2011

DOCKET

11-AFC-2

DATE SEP 30 2011

RECD. SEP 30 2011

Chief Paul Postle
Southern Inyo County Fire District
410 Tecopa Hot Springs Road
Tecopa, CA 92389-0051

RE: Potential Fire District Emergency Medical Response Needs for the Proposed
Hidden Hills Solar Electric Generating Systems (HHSEGS) Project (11-AFC-2)

Dear Chief Postle,

Hidden Hills Solar I, LLC, and Hidden Hills Solar II, LLC (the applicant), are seeking a license from the California Energy Commission to construct and operate a power generation facility. The Hidden Hills Solar Electric Generating System (HHSEGS or proposed project) is proposed on approximately 3,277 acres (5.12 square miles) of privately owned land in Inyo County, California, along the California-Nevada border and approximately 18 miles south of the town of Pahrump, Nevada.

HHSEGS proposes two solar fields and associated facilities: the northern solar plant (Solar Plant 1) and the southern solar plant (Solar Plant 2). Each solar plant would generate 270 megawatts (MW) gross (250 MW net), for a total net output of 500 MW.

To assess impacts of the proposed project on emergency medical services, Energy Commission staff requests information on existing emergency medical resources and services in the project area and the estimated need for additional services if the project is approved. A form is provided as an attachment to this letter with data needs and questions highlighted. Key characteristics of the applicant's proposed project that are considered applicable to emergency medical response needs assessment are briefly summarized on the form. A map of the project site is also attached.

From our review of the project's Application For Certification (AFC), we understand the applicant is working with your office to ascertain any requirements and reduce any potential project impact to fire response. We also understand that SIFPD would be the first responder to the project site, responding from the area locally known as Charleston View. The AFC also discusses the mutual aid agreements SIFPD has with Pahrump Valley Fire-Rescue Service and Nye County Fire Department (Pahrump, Nevada), as part of Nye County Emergency Services (NCES), as well as one with Clark County (Las Vegas, Nevada) for responses requiring more assistance. According to the AFC, the Bureau of Land Management (BLM) fire station in Apple Valley would be the next responding station after SIFPD's two stations and Pahrump Valley Fire-Rescue Service.

We have a few questions in addition to the enclosed needs assessment form:

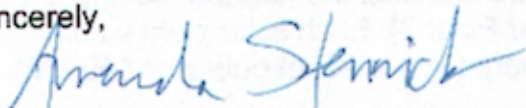
1. Please state which agency or entity would be the first responder to medical emergencies at the project site.

2. Under what conditions or situations would other agencies or entities respond in place of the designated first responder to medical emergencies at the project site?
3. Do the mutual aid agreements SIFPD has with agencies in Nevada and the BLM include provisions for emergency medical response? If so, please list the agencies where emergency medical response is included as part of the agreement.

The project applicant's entire AFC is available at the Energy Commission's website: < <http://www.energy.ca.gov/sitingcases/hiddenhills/documents/applicant/afc/>>. Section 5.10 Socioeconomics would be the most pertinent section to review, as well as Section 5.16 Worker Health and Safety.

Please provide your responses to the above questions and the needs assessment form and include any comments you may have regarding emergency medical response for the proposed project by February 2, 2012. Send your responses to my attention (my contact information is below). If you have questions regarding the proposed project or this request, please contact Lisa Worrall of my staff at (916) 654-4545 or by e-mail at: lworrall@energy.state.ca.us. Thank you in advance for your time and assistance.

Sincerely,



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Enclosures: Emergency Medical Response Needs Assessment Form
Map showing the approximate location of the project site (from the AFC)

cc. Mike Monasmith, California Energy Commission Project Manager

Emergency Medical Response Needs Assessment Form	
Project Characteristics, as Proposed by the Project Applicant	
Type, Location, Size, and Site Access:	Power generating facility proposed on 3,277 acres in Inyo County, California, along the California-Nevada border. Primary site access would be from Tecopa Road (Old Spanish Trail Highway) from the project entrance road at the east side of the project. Secondary access would also be from Tecopa Road at the west side of the project, then along the paved road between the two solar plants.
Estimated Schedule:	Construction of the power generating facility, from site preparation and grading to commercial operation, would take approximately 29 months. If approved, construction would begin the third quarter of 2012 and conclude the second quarter of 2015. The two solar plants would be constructed concurrently with a planned three-month delay between their start dates. See Table 2.2-2 in the Project Description Section of the AFC for a list of the project schedule major milestones.
Construction (Traffic and Work Force):	Construction would generally occur between 5 a.m. and 3:30 p.m. with swing shift during heliostat assembly from 6:00 p.m. to 4:00 a.m. During the peak construction month (month 14), approximately 2,744 daily trips would occur. Of these daily trips, truck traffic accounts for 834 trips. The truck trips are assumed to be spread out equally throughout the day (from 6 a.m. to 6:00 p.m.). These trips are only the trips for the project site and do not include the trips related to the construction of the transmission line and gas line (as they are off-site). The number of workers per day range from 35 in month 29 to 1,033 in month 14. The highest numbers are predicted during construction months 13 through 16. The peak number of workers on-site is during month 14 with a projected 1,033 workers. Overall, there is a 1-year period where the number of workers is within approximately 20% of the peak.
Operation (Staff and Traffic):	The project would employ approximately 120 full-time workers resulting in approximately 240 daily trips. Only 40 employees are required for the daytime shift (80 trips) and the remaining 80 employees would work an evening shift. The evening shift employees would likely travel outside of the peak commute period.
Project Medical Emergency Response Features:	A health and safety program for both construction and operation designed to mitigate hazards and comply with applicable regulations would be implemented. Safety training programs would be provided to construction and operations personnel. The Emergency Action Program/Plan is part of the construction and operation health and safety plan. The Emergency Action Program/Plan would describe escape procedures, rescue and medical procedures, alarm and communication systems, and response procedures for very hazardous materials that can migrate. The programs or plans are contained in written documents that are usually kept at specific locations within the facility.
Existing Emergency Medical Response Resources and Services in the Project Area (attach additional paper if more room is needed to answer questions)	
Names and addresses of the facilities (e.g., fire stations, ambulance dispatch facility) serving the project area, and distance of closest dispatch facility to the project site:	
Adopted or desired emergency medical response service standard (e.g., 5 minute minimum emergency response time, 1 emergency response unit per 1,000 employees):	
Existing staffing levels able to respond to emergency medical incidents for facilities serving the project area (including permanent and volunteer staff, totals and per shift):	
Estimated emergency medical response times to the project site:	
Current projected needs (e.g., facilities and staff) to maintain or meet existing emergency medical response service levels:	

Emergency Medical Response Needs Assessment Form

Exchange of general emergency medical response responsibilities (e.g., formal and/or informal agreements with local municipalities or private companies for provision of services) in the project area:

Current inventory of specialized equipment or services (e.g., life flight services):

Estimated Need for Emergency Medical Response Services, Equipment, and Facilities (attach additional paper if more room is needed to answer questions)

Is there a process or formula used by your department to determine the need for additional medical response services to serve a new large-scale power plant? Please explain.

Could the project trigger a need for additional emergency medical response services? Please explain.

During project construction:

During project operation:

Could increased project-related traffic affect circulation and access on roads near the project site to the extent that an impact to emergency response times might occur? Please explain.

During project construction:

During project operation:

Do emergency medical response personnel review development site plans for projects to assess potential medical emergency issues (e.g., safety plans, emergency response plans)? Please explain.

Please explain any other emergency medical response concerns that have not been addressed by this needs assessment form.

Person Completing This Needs Assessment Form

Name:

Title/Position:

Telephone No:

E-mail Address:

