

KEVIN D. CARUNCHIO
County Administrative Officer



COUNTY OF INYO

ADMINISTRATOR'S OFFICE
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DOCKET

11-AFC-2

DATE FEB 16 2012

RECD. FEB 21 2012

February 16, 2012

Mike Monasmith, Project Manager
Amanda Stennick, Planner III/Supervisor
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5112

SUBJECT: Hidden Hills Solar Energy Generating System Project
Socio-Economic Impacts to Inyo County

Dear Mr. Monasmith and Ms. Stennick:

Forwarded with this letter are preliminary estimates of the fiscal impacts of the construction and operation of the proposed Hidden Hills Solar Electric Generating System (HHSEGS), prepared by nine (9) Inyo County departments, with the assistance of the County's economists, Gruen Gruen + Associates (GG+A). The estimates are preliminary because the information the County has received to date about the construction and operation of the proposed project is not complete. As a result, the departments have had to rely solely on the information contained in the Application for Certification (AFC) to the California Energy Commission, and clarifying information regarding that application supplied by CH2MHill in response to questions from GG+A.

For example, the County Sheriff prepared his estimates without access to a security plan for the proposed project or information about what the project's sponsor had agreed to contribute to the cost of facilities, such as an emergency response center that would be needed for the Sheriff's Office to fulfill its responsibilities. (Please note that also enclosed with this correspondence are responses from the Inyo County Sheriff's Office in regard to your September 30, 2011 letter to Undersheriff Keith Hardcastle and the associated law enforcement needs assessment form.)

We were also unable to obtain any information about the proportion of the considerable heavy truck traffic likely to come from the California and Nevada sides of the project; in its present condition, The Old Spanish Trail, an historic, key road to the project is simply not able to handle the traffic that will be induced by the project and will deteriorate rapidly if it is not reconstructed in advance of the commencement of construction activities related to the project.

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Rather than wait until the County had all the information about the relevant aspects of the construction and operation phases of the project, the County departments have made what we believe are reasonable assumptions about the demand for the construction and maintenance of public facilities, as well as the required public services that will be induced by the proposed project's construction and operation. As discussed in the accompanying correspondence that summarizes the cost estimates, some of the work by County agencies and departments will have to begin before project construction starts.

As those members of your staff who have visited Charleston View know, the area where the proposed project will be sited is sparsely populated, and presently only very lightly served by County agencies and departments from offices and stations located at significant distances from the site. For the most part, Charleston View is not yet a place where the marginal costs of providing public services to a large and expensive project are relatively low. Access to necessary public services cannot yet be provided by simply making small additions to an existing base of public capital and personnel.

In the enclosed correspondence from County departments, the County departments estimated the initial costs that will be induced by the project during its construction, and the annual costs that will be induced during operation. A summary of these cost forecasts is presented in Table 1 below. If your staff or consultants have questions for the departments, please coordinate your questions through this office so we can avoid duplication and update our own data base with the answers you receive.

Table 1 Forecasts of Departmental Costs Induced by Construction and Operation of HHSEGS			
Departments	Initial/ Construction	Ongoing Annual*	Comments
Health & Human Services		\$188,115	
Assessor	\$120,000	\$120,000	Specialized appraisal requiring the retention of expert appraiser and tax counsel.
Sheriff	\$2,130,966	\$1,269,120	Closest substation is 34 miles away, and current staff serves 3,200 square miles west of the substation. See Law Enforcement Needs Assessment Form.
Public Works	\$8,157,000	\$78,500	Reconstruction of Spanish Trail and annual maintenance
Information Services	\$237,600		Assumes 30 months of high speed data communications system
Agricultural	\$150,000	50,000	Monitoring and control project targeted against introduction of invasive weeds
Waste Management	\$156,000		Waste collection for 3 years from Tecopa RV Park and Charleston View area.
Motor Pool	\$33,200		Lower of two estimates of trips during construction. May be as high as \$66,000
Water Department	\$145,000	\$8,000	Estimate for creation of monitoring program and on-going monitoring costs.
Total	\$11,129,466	\$1,713,735	
* Annual costs shown are for the first year. They are estimated to increase at 5% per year.			
Source: Information on the project's characteristics provided by the BrightSource AFC and additional information provided by CH2MHill in response to questions by Gruen Gruen + Associates			

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We have not completed our estimates of the costs associated with the opportunity for alternative use of the 3,277 acres and the adjoining lands that will be foregone with the construction of the project. As discussed in the AFC, "The Old Spanish Trail" and other portions of Charleston View are historic, and the area has significant environmental assets that are just beginning to attract some specialty visitors, such as eco-tourists and geologists. The project would occupy 3,277 acres of a 13,000-acre property that accounts for 8 percent of all remaining private land in Inyo County. While the availability of such a large parcel of privately owned land is unique, the Charleston View area has yet to reach an economic "take off point."

Development of the proposed project site is allowed by current County land use regulations to entitle the construction of housing on 170 parcels, but no construction is started and a wide variety of other options for the future use are likely to open up once electricity is brought to the area. Electricity will finally be coming to the area no later than next year, and the availability of that service will remove one major impediment to development. The other major impediment to future development is uncertainty concerning the availability of sufficient water to support major commercial, recreational or residential developments. Several years ago, a test well for water to serve a proposed residential development was started but not completed. Timing of development, which in this case would be a series of "no project alternatives" to the proposed project, is difficult to predict, but the County has asked its economist to work with the Inyo County Planning Department and your Commission on the necessary no-development forecasts.

Through separate correspondence, the County will be submitting recommendations for monitoring and protecting hydrologic resources in the area consistent with conditions the County has placed on other industrial developments in Inyo County, and what the County would likely require of the project applicant if not for the exclusive permitting jurisdiction of the California Energy Commission. Costs associated with the Inyo County Water Department involvement in monitoring hydrologic issues associated with the project, including any hydrologic mitigation program that may be adopted by the CEC, are included in this correspondence.

Because of the proposed HHSEGS project's physical characteristics, its completion would not only hinder any future alternative use of the site itself, but also the private lands around it, including the 9,500-acres of land around the site that are owned by the same lessor of the project site. The mirrors, 750-foot tower and other interference with the aesthetics and views in the area are a potential drag on the demand for neighboring uses, as is the potential hazard or perception of hazard from the high pressure gas lines and other project externalities.

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While much work still needs to be done to obtain an understanding of the longer run opportunities that would be lost to the County's residential, employment and tax base, it is clear that the cost of these lost opportunities may be significant. We offer this correspondence, including the incorporated documentation, as a starting point for that analysis.

To assist us in being able to evaluate and more fully analyze the opportunity costs associated with the project, Inyo County requests that it be provided with a copy of the applicant's Power Purchase Agreement with Pacific Gas and Electric, as approved by the California Public Utilities Commission, as well as a copy of the applicant's lease agreement with the owner of the project site. Both documents are critical for the County and, we assume your agency, to fully evaluate the socioeconomic impacts of the project. If necessary to gain access to these documents, the County is agreeable to developing and entering into a confidentiality agreement to meet the needs of all involved parties.

In light of the California Energy Commission's sole jurisdiction for permitting the Hidden Hills Solar Energy Generating System project, Inyo County will look to the Commission to fully identify and mitigate the project's impacts on already-strained County programs and services, both during its construction and during its operation, including addressing opportunity costs associated with the project. The County appreciates the Commission's recognition of the applicability of Title 21 of the Inyo County Code to the project, and the requirements that ordinance places on projects such as the HHSEGS to fully analyze the socioeconomic impacts of the project in much more detail than otherwise required by the California Environmental Quality Act, as evidenced by the Commission's engagement of Aspen Consulting to assist in the preparation of a socioeconomic analysis. In order to avoid duplication of effort, and to ensure the resulting analysis meets the needs of the County pursuant to Title 21, we request you consider allowing GG+A to assist Aspen in the preparation of the socioeconomic analysis rather than relegating the County and GG+A to reviewing and commenting on Aspen's analysis after it is published.

As shown in the table above, the costs to the County greatly exceed the increased property taxes that the County will receive due to the construction of the project (approximately \$300,000 per year according to the AFC) and the taxes are insufficient to support needed local improvements and services required to serve the project.

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Thank you for your consideration of our preliminary analyses and requests. Please contact me directly if any aspect of this correspondence requires clarification or further discussion and I will gladly put you in contact with the appropriate County staff and/or representative. I understand that this memorandum addresses economic impacts which are being addressed by different Commission analyses. I am requesting that you forward this letter to each analyst addressing the impacted service areas for their consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'KDC', followed by a long horizontal line.

Kevin D. Carunchio
County Administrative Officer
County of Inyo

KDC/dg
Enclosures

cc: Inyo County Board of Supervisors
Inyo County Health and Human Services
Inyo County Assessor
Inyo County Sheriff
Inyo County Public Works
Inyo County Information Services
Inyo County Agriculture
Inyo County Waste Management
Inyo County Motor Pool
Inyo County Water Department
Gruen Gruen + Associates

HHS – Administrative Office

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OR

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Bishop, CA 93514

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County of Inyo

**Health and Human Services
Department/Inyo Mono Area
Agency on Aging**

Jean Turner, M.A., Director

jturner@inyocounty.us

MEMO

TO: Kevin Carunchio, CAO

FROM: Jean Turner

CC:

DATE: December 12, 2011

SUBJECT: Impacts from Bright Source Energy Project

This impact discussion is a summary of discussions with all HHS managers and supervisors about the pending energy project proposed for the Charleston View area of Inyo County. According to our Tecopa Operations Manager, Kathy Nixon, the Charleston View community has a number of available properties, and currently there is an increase in the number of "squatters" parking their trucks (with camper shells, etc.) on various of the lots in the area.

This has led HHS to speculate that workers during the construction phase of the Bright Source project may be looking for inexpensive/free accommodations to lower their personal costs. As such, it is quite possible that an undetermined number of workers may "squat" in Charleston View or land in the inexpensive area of Tecopa.

Since we already are experiencing a workload increase simply based on mandates to verify residence prior to determining eligibility to various HHS programs, I expect our Tecopa-based staff may need to increase by

- 1) one HHS Specialist for address verifications, and for an increase in assistance with videoconferenced services from Bishop, including Mental Health, Drinking Driver and other substance use programs.
- 2) Addition of one vehicle
- 3) Increased cost of utilities, program curricula and materials for Bishop-based services
- 4) Enhanced I.T. infrastructure and videoconferencing capacity to link services from Bishop to Tecopa

Thank you for allowing us this opportunity to propose potential additional costs.

OFFICE OF THE
SHERIFF
INYO COUNTY, CA



WILLIAM R. LUTZE
SHERIFF

KEITH HARDCASTLE
UNDERSHERIFF

"A Professional Service Agency"

Date: January 16, 2012

To: Kevin Carunchio, Inyo County Administrator

From: Sheriff William Lutze

RE: Estimated Cost Impacts of HHSEGS on Office of the Sheriff, Inyo County, California

Kevin,

Below is a breakdown of the estimated costs at this time for the Hidden Hills Solar Project located in Charleston View, California. These estimates are based on our understanding of the private infrastructure, local employment and population changes that will be induced by the project. Primarily, the changes in the local industrial, employment and population that must be served by this office are the direct result of the project's construction and operation, rather than the induced spillover effect on the existing economy of Inyo County, which we understand will be small relative to the direct effect of the HHSEGS construction and ongoing operation. We have prepared these estimates without the benefit of a security plan from BrightSource that might include the internalization of some security requirements that would otherwise be the sole responsibility of the Office of the Sheriff.

Our estimates are categorized as one-time initial costs and annual on-going costs. It is possible that BrightSource might want to provide the housing needed for our officers, the sites for such housing and/or the substation building that could be part of a "community building". It should be noted that if approved we must begin the process quickly as the hiring and training process takes approximately one year.

One time initial costs:

- | | | |
|--|----------------------|---------------------|
| ➤ Hiring and Recruitment | \$2,048.00 X7 | \$14,336.00 |
| Hiring and Recruitment: New positions require standard recruitment costs such as advertising, as well as costs associated with required background investigations, psychological examinations, and physical clearance. The total cost equates to \$2,048 each. There will be a need for seven positions; therefore the total amount is \$14,336. | | |
| ➤ Academy Training | \$18,390.00X7 | \$128,730.00 |
| Academy Training: Academy training is required for all officers. The cost is approximately \$18,390 for each of the seven new positions; this includes tuition, required gear and ammunition, housing, and per diem. The total amount for seven positions is \$128,730. | | |

- **Initial Startup** **\$49,700.00X7** **\$347,900.00**
(Vehicle, uniform equipment, personal Gear)

Initial startup: As mentioned in the original cost breakdown, this includes equipping each officer with a patrol vehicle, personal gear, and uniforms. The estimate for the vehicle is based on recent County purchases, and the cost associated with officer gear fluctuates very little. The amount for each officer is \$49,700; the total for seven officers is \$347,900.

- **Housing** **\$80,000.00X7** **\$560,000.00**

- **Housing:** The Inyo County Sheriff's Office has assumed responsibility for maintaining housing facilities for officers stationed in remote regions of Inyo County due to the lack of availability and adequate housing in the area and due to greater success in both recruitment and retention of employees. The original estimate of \$560,000 was inclusive of individual modular residences for each of the seven new positions (\$80,000 each).

- **Property (Land)** **\$60,000.00X8** **\$480,000.00**

- **Property:** The property cost is based upon a 2.5 acre minimum requirement of sewer and water, as set forth by the current Inyo County General Plan. Plan changes may alter the estimated price of \$60,000 per site. Seven of the eight of the sites are for the employee housing. The eighth is for the substation, below.

- **Substation Building** **\$450,000.00X1** **\$450,000.00**

- **Substation Building:** The total amount, \$450,000, represents construction and development costs for a new Sheriff's substation facility. This facility would need to be large enough for day to day Sheriff's operations and storage, and to serve as an evacuation and temporary shelter site for any potential local disasters or emergencies. The Inyo County Sheriff's Office would be willing to review and consider a consolidated housing, and substation facility to be built and donated by BrightSource.

Note Substation set-up: The total amount estimated is \$150,000 and will include necessary technology (hardware, software, computers, copiers, printers, etc.), security system, and office equipment and furniture.

- **Substation setup** **\$150,000.00X1** **\$150,000.00**

Total **\$2,130,966.00**

Ongoing costs (yearly basis)

- **Personnel Costs (salary and Benefits)** **\$989,826.00**
 1 Sergeant
 1 Corporal
 5 Deputy Sheriffs
 1 Account Tech 3

Personnel Costs: The Inyo County Sheriff's Office recognizes that an introduction of infrastructure, such as the size and scope of the Hidden Hills Project, will require additional staff. It is neither feasible nor cost effective for the Office of the Sheriff to meet its responsibilities to HHSEGS from the closest current substation, which is approximately 34 miles from the project, with a staff that already covers 3,200 square miles to the west of that substation; including the towns of Furnace Creek Ranch (in Death Valley) and Stovepipe Wells (in Death Valley) which are located 60 and 90 miles from that substation. An analysis of the potential impact of this project (which factored in population increase and therefore an inevitable increase in crime), resulted in the conclusion that in order for twenty-four

hour patrol coverage to take place, as well as basic accommodations in scheduling there would be a need for seven sworn staff, and one non-sworn position to serve as an office manager. The total amount, \$989,826 is based on current Inyo County salaries, benefits, and retirement contribution for one sergeant, one corporal, five deputy sheriffs, and one account technician. If the on-project security force hired by BrightSource is of sufficient size and capability to carry some of the responsibility normally carried out by the Office of the Sheriff, it may be possible to reduce somewhat the additional staff that this office will have to station in Charleston View.

- **Yearly Training costs** **\$90,920.00**
- Yearly training cost: Training of sworn deputies is mandated; estimates are based 10 percent of an individual's salary. This amount factors in overtime for travel/training, per diem, hotel, and training registration fees.

- **Utilities, Maintenance** **\$24,000.00**
- Utilities and maintenance: The total annual estimate for utilities and maintenance for a sheriff's substation and housing for sheriff's deputies is approximately \$24,000.

- **Vehicle Costs @\$.70 per mileX7** **\$49,000.00**
- Vehicle cost: Due to the remote area of the Hidden Hills Project and the added necessity for patrol deputies to access and respond to desolate terrain within Inyo County, four-wheel drive vehicles are essential. The current 2012 mileage reimbursement rate per the Internal Revenue Services is 55.5 cents per mile; the added costs associated with fueling four-wheel drive vehicles and the general wear that will occur due to the rough terrain accounts for the estimated increase to 70 cents per mile. At minimum each patrol vehicle will incur fuel and maintenance costs of approximately \$7,000 each; therefore the total for seven four-wheel drive patrol vehicles per year is \$49,000.

- **Administrative Overhead** **\$115,374.00**
- Administrative overhead: The estimated amount of \$115,374 is directly related to the cost that the Inyo County Sheriff's Office will incur for offsite support staff, sworn personal, maintenance of contracts, processing payroll, budget preparations, employee evaluations, and all other necessary record keeping and costs associated with conducting business.

Yearly total cost **\$1,269,120.00**

Total one time startup plus 1st year annual cost **\$3,400,086.00**

****An annual 4% increase each year will be added for increased expenses.**

If you have any questions or need further information, please contact me.

Sincerely,


William R. Lutze, Sheriff

Office of the
SHERIFF
INYO COUNTY, CA



WILLIAM R. LUTZE
Sheriff

Keith Hardcastle
Undersheriff

"A Professional Service Agency"

February 16, 2012

Amanda Stennick
California Energy Commission
1516 Ninth Street, MS 40
Sacramento, CA 95814

RE: Response to questions in September 30, 2011 letter regarding law enforcement needs for the proposed Hidden Hills Solar Electric Generating Systems (HHSEGS)

Dear Ms. Stennick,

I apologize for the delay in responding to the questions in the September 30, 2011 letter regarding law enforcement needs for the proposed HHSEGS project.

CEC question: Can you clarify what the response time would be from the sheriff station in Shoshone? The AFC seems to indicate a response time of 30 minutes to 1 hour and then reports a response time of 1.5 hours to 2 hours.

Answer: There is a substation in Shoshone; approximately 34 miles from the project site. However, the patrol deputy stationed in Shoshone is responsible a 3,200 square mile beat area. Therefore the response time is dependent upon where the patrol deputy is in the beat; response time can vary from 30 minutes to 4 hours. Depending on the type of assistance needed, and the geographic location of other deputies, response time for any additional or specialized assistance could be an added 3 to 4 hours on top of the 3 to 4 hour initial response time.

CEC question: Beside the California Highway Patrol and Nevada Highway Patrol, who is the primary law enforcement agency for state highways and roads and does the Inyo County Sheriff's Department have any other law enforcement resources that could respond to law enforcement calls at the project site?

Answer: Nevada Highway Patrol has no law enforcement authority in California for crimes. California Highway Patrol has the primary responsibility of traffic. The closest responder with California Peace Officer rights is San Bernardino County Sheriff; the response time could be upward of four hours. Just to clarify, National Park Services and Bureau of Land Management have rangers in the project site vicinity, but neither agency has peace officer authority under PC §830.1.

If you have any further questions please do not hesitate to contact me at (760) 878-0326 or you may email me at: blutze@inyocounty.us.

Thank you,

A handwritten signature in blue ink, appearing to read "William R. Lutze".
Sheriff William Lutze

Law Enforcement 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 heleostat 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.
Security:	A 12-foot-wide unpaved path would be constructed on the inside perimeter of the project boundary fence for use by HHSEGS personnel to monitor and maintain perimeter security. The AFC does not discuss any other proposed on-site security measures.
Existing Law Enforcement 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., sheriff substations) serving the project area, and distance of closest dispatch facility to the project site:	Shoshone Substation Hwy 127 Shoshone, CA Approximately 34 miles from the project site. Closest dispatch facility is in Independence, approximately 200 miles from the project site.
Adopted or desired service standard (e.g., one sworn officer per 1,000 population) applicable to the project site:	The service standard is not based on population; service standard is based on the amount of area covered, and response time needed for calls for service.
Existing staffing levels for facilities serving the project area (including sworn officers and civilians, totals and per shift):	One deputy currently patrols 3,200 square miles.
Estimated response times to the project site: Priority calls: Non-Priority calls:	Estimated response time for priority calls could be 3 to 3.5 hours; these times are based on where the patrol deputy is located in the 3,200 square mile beat area once a call for service is received. Non-priority response time is 4-plus hours. It should be noted that depending on the type of assistance needed, and the geographic location of the other deputies, response time for any additional or specialized assistance could be an added 3 to 4 hours on top of the 3 to 4 hour initial response time.

Law Enforcement Needs Assessment Form

Current projected needs (e.g., facilities and staff) to maintain or meet existing service levels:

Additional needs beyond those identified above to maintain or meet existing service levels with the project:

Hiring and Recruitment: New positions require standard recruitment costs such as advertising, as well as costs associated with required background investigations, psychological examinations, and physical clearance. There will be a need for seven positions.

Academy Training: Academy training is required for all officers.

Initial startup: This includes equipping each officer with a patrol vehicle, personal gear, and uniforms.

Housing and Property: The Inyo County Sheriff's Office has assumed responsibility for maintaining housing facilities for officers stationed in remote regions of Inyo County due to the lack of availability and adequate housing in the area and due to greater success in both recruitment and retention of employees.

Substation Building: This facility would need to be large enough for day to day Sheriff's operations and storage, and to serve as an evacuation and temporary shelter site for any potential local disasters or emergencies.

Substation set-up: This includes necessary technology (hardware, software, computers, copiers, printers, etc.), security system, and office equipment and furniture.

Exchange of general law enforcement responsibilities (e.g., formal and/or informal agreements with local municipalities for provision of services) in the project area:

There are no existing Memorandums of Understanding with allied agencies in the project area. The only exception would be California Highway Patrol; however their primary responsibility is traffic. National Park Service and Bureau of Land Management have rangers in the response area; but neither agency has peace officer authority under PC § 830.1

Current inventory of specialized equipment (e.g., helicopters or other aircraft):

N/A

Estimated Need for Law Enforcement 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 law enforcement services to serve a new large-scale power plant? Please explain.

Yes. The Inyo County Sheriff's Office recognizes that an introduction of infrastructure, such as the size and scope of the Hidden Hills Project, will require additional staff. It is neither feasible nor cost effective for the Office of the Sheriff to meet its responsibilities to HHSEGS from the closest current substation, which is approximately 34 miles from the project, with a staff that already covers 3,200 square miles to the west of that substation; including the towns of Furnace Creek Ranch (in Death Valley) and Stovepipe Wells (in Death Valley) which are located 60 and 90 miles from that substation.

An analysis of the potential impact of this project, which factored in population increase and therefore an inevitable increase in crime, resulted in the conclusion that in order for 24-hour patrol coverage to take place, as well as basic accommodations in scheduling there will be a need for seven sworn staff, and one non-sworn office assistant position.

Law Enforcement Needs Assessment Form

<p>Could the project trigger a need for additional law enforcement services for on-site crimes against persons, theft of materials, and/or vandalism? Please explain.</p> <p style="padding-left: 40px;">During project construction:</p> <p style="padding-left: 40px;">During project operation:</p>	<p>Yes. Because of the materials used during construction, and on-going operation, there is a significant potential for increased theft and vandalism. Furthermore, with an estimated population increase of 1,100 construction workers and laborers during the first 14 months of project implementation, the Sheriff's Department must factor in the likelihood of violent crimes; immediate response times are required for crimes this nature.</p>
<p>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.</p> <p style="padding-left: 40px;">During project construction:</p> <p style="padding-left: 40px;">During project operation:</p>	<p>Yes. California Highway Patrol has primary responsibility for traffic and traffic collisions. The only road that will be used for project site access from Inyo County, Old Spanish Trail, is a two-lane road; therefore if there is an accident, an emergency, or road damage due to severe weather there will be a delay to the project site from law enforcement.</p>
<p>Do law enforcement personnel review development site plans for projects to assess potential law enforcement issues (e.g., lighting and other safety factors)? Please explain.</p>	<p>Yes. Recommendations can be made based on the project's security plan.</p>
<p>Are specific measures recommended to reduce the potential for crimes to occur at or near the project site (e.g., specific types of security fencing)? Please explain.</p>	<p>Yes. In addition to staffing needs as outlines above, the Inyo County Sheriff's Office can make recommendations regarding project site security (i.e. fencing, security control, surveillance)</p>
<p>Please explain any other law enforcement concerns that have not been addressed by this needs assessment form.</p>	<p>Due to the remote location of the site and the metropolitan areas nearest the site (Pahrump and Las Vegas) the facility has the potential for both high theft and vandalism. The added work-force population during the estimated 14 month project implementation phase increases the likelihood of violent crimes.</p>
Person Completing This Needs Assessment Form	
<p>Name:</p> <p>Title/Position:</p> <p>Telephone No:</p> <p>E-mail Address:</p>	<p>Sheriff William Lutze</p> <p>Inyo County Sheriff</p> <p>760-878-0326</p> <p>blutze@inyocounty.us</p>



DEPARTMENT OF PUBLIC WORKS

P.O. DRAWER Q
INDEPENDENCE, CA 93526
PHONE: (760) 878-0201
FAX: (760) 878-2001

COUNTY
OF
INYO

Doug Wilson, Acting Director

MEMO: December 21, 2011

To: Kevin Carunchio, County Administrator Officer

Public Works Departmental Impacts Related to the HIDDEN HILLS SOLAR ELECTRIC GENERATING SYSTEM (HHSEGS)

In response to your request for anticipated departmental impacts related to the construction and operation of the proposed HHSEGS, Inyo County Public Works Department presents the following impacts including associated labor, materials, and equipment:

1.) **Deterioration of Old Spanish Trail Road:** The anticipated delivery of the HHSEGS mirrors is expected to be from Hwy 127 onto Old Spanish Trail Road. This impacted roadway stretches for 30.1 miles from Highway 127 to the Nevada State line. The existing paved width for this roadway is approximately 22 feet (varies). We anticipate that the construction portion of the project would subject the roadway to severe truck traffic loads (approx. 85,000 total vehicle trips - per Gruen Gruen & Associates Construction Delivery Schedule Spreadsheet) and damage it to a point requiring "full section" reconstruction. The proper solution for this would be to reconstruct the entire length of road to current standards considering the anticipated truck traffic. An alternative would be to construct, prior to receiving any increased truck traffic, an AC pavement overlay on top of a geotextile reinforcement fabric material designed for the traffic loads anticipated for the entire 30.1 mile length of Old Spanish Trail Road. The cost for performing this work at today's prices by awarding a publicly bid Contract is estimated to be \$8,000,000 (assuming a 2" AC pavement overlay). This option would include an agreement to evaluate the road conditions during and at the end of the construction period to determine any additional repairs up to and including additional overlays. This estimated cost would of course need to be adjusted by a "construction cost escalation factor" applied to this amount until the job is awarded.

2.) **One (1) Additional Road Dept. Position and One (1) 30-month Limited Term Position (Shoshone Road Yard):** Current staffing at this County Road Dept. yard consists of One (1) Equipment Operator II and One (1) Equipment Operator I. It is anticipated that during project construction existing County infrastructure maintained by County Road Dept. staff would experience an increase in required maintenance. After the project is complete and it becomes operational, there would still be an additional maintenance burden on the County Road Dept. work crews and the additional single staff position would be offset this burden. Total wages and benefits costs associated with these staffing recommendations would be \$157,000 for thirty (30) months and \$78,500 annually thereafter (for the anticipated life of the solar plant). There would also be additional equipment requirements related to adding additional employees. This equipment would consist of a medium sized front end loader and a pick-up truck. These one-time equipment costs have been estimated to be \$135,000 at today's prices.

Doug Wilson
Interim Public Works Director



County of Inyo
Information Services
168 N. Edwards St.
Independence, California 93526

Brandon Shults
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bshults@inyocounty.us

December 15, 2011

Mr. Kevin Carunchio
County Administrator's Office

Re: Potential Information Services impact resulting from the BrightSource energy project

The County of Inyo presently services two County facilities in the South Eastern corner of Inyo County, the area of the county most likely significantly impacted by the proposed BrightSource project. High-speed data communications is not readily available in the project area and the satellite service presently employed there for data communications is inadequate. Data communications infrastructure improvement is required in order to accommodate the anticipated increased volume of public service requests resulting from the project.

My understanding is that the project will construct a cellular communications tower near the project site. The construction of cell tower at the project site does not mitigate the impact to Information Services to provide secure, high-speed communications to County facilities in the area. There is no guarantee any communications vendor will provision the cell tower for service. If service is provisioned, there is no guarantee the service provided will be 4G wireless service; less than 4G is inadequate to meet the business requirement for speed or security. Should the cell tower be provisioned with 4G wireless service, geography prevents the service being available to the communities of Tecopa and Shoshone where County facilities exist to provide service to the project. A cell tower constructed at the project site will not obviate the need for implementation of secure, high-speed data communications infrastructure in the Tecopa/Shoshone area necessary to support the project.

Based on recently solicited quotes, the cost of implementing secure, high-speed data communications over land-line infrastructure available in the Tecopa/Shoshone area is consistent on a per site basis. The table below details the estimated costs of a single location and considers implementation and 30 months of monthly recurring costs (30 months is the estimated duration of the construction phase of the project). It has been suggested that at least three facilities will require data communications improvement as a result of the BrightSource project. The estimated cost for implementation and operation of the necessary communications improvement for three facilities for a term of 30 months is \$237,960. If services must be expanded to additional facilities, the County of Inyo will incur an estimated additional cost of \$79,320 for each such facility.

BrightSource Project Support Costs Estimates			
- Per Site Cost Estimate -			
Qty	Description	Each	Total
1	Two-day trips of two IT resources to support implementation of IT infrastructure, voice communications and High Speed Internet	\$500.00	\$500.00
32	Labor	\$60.00	\$1,920.00
1	Data Switches	\$2,500.00	\$2,500.00
1	Firewalls	\$500.00	\$500.00
1	Assorted infrastructure supplies: Cat5e Cables, connectors, etc.	\$500.00	\$500.00
2	Installation of High-Speed Internet	\$700.00	\$1,400.00
30	Monthly recurring costs of High-Speed communications	\$2,400.00	\$72,000.00
			<u>\$79,320.00</u>

The minimum service commitment on the proposed solution is 24 months; as a result, there are no anticipated wind-down costs associated with completion of the project construction phase.

No Information Services staff is dedicated solely to the South County and no Information Services staff lives in the area. The average travel and per-diem cost of a one-day service trip to the South County from Independence is approximately \$350. Information Services makes an average of two service trips to the South County annually. The number of required service trips is estimated to increase to six per year as a result of the BrightSource project; however, it is anticipated that the additional service required can be absorbed by the present Information Services staffing level and that no additional Information Services staff should be required.

Thank you,
 Brandon Shults
 Director - Information Services
 County of Inyo



Counties of Inyo & Mono



George L. Milovich
Agricultural Commissioner
Director of Weights and Measures
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December 14, 2011

TO: Gruen Gruen + Associates

FROM: George Milovich, Agricultural Commissioner

SUBJECT: Invasive Weed Introduction Concerns

The Hidden Hills Solar Energy Generating System has the potential to increase invasive plant threats to lands within Inyo County. Project details provided in the December 1, 2011 memo from Gruen Gruen + Associates indicate most equipment and employee vehicular traffic will originate from southern Nevada. Southern Nevada is known to be infested with California "A"-rated invasive plants Halogeton (*Halogeton glomeratus*) and Camelthorn (*Alhagi psuedalhagi*). Also known to exist in this area are "B"-rated species Saltcedar (*Tamarix rammossisima*) and several types of knapweeds (*Centaurea* and *Acroptilon spp.*).

Any movement of equipment, vehicles, and construction material can introduce invasive weed species via plant matter or seed attached to these items. Also concerning to my department is the soil disturbance that invariably occurs with any type of construction. This disturbance has been shown to create conditions conducive to weed introduction and establishment. The introduction of out of state equipment originating from areas known to be infested by these invasive species, coupled with this disturbance, represents a very real threat of large scale (3,000+ acres) infestation.

For these reasons my office anticipates increased monitoring activities to abate these threats. The establishment of any of the species listed above may require abatement by the Agriculture Department, and will result in additional expenditures by the Eastern Sierra Weed Management Area Division. We feel strongly that the exotic species threat can be mitigated with a proper detection and eradication program.

The State of California Department of Food and Agriculture (CDFA) controls noxious weed species as defined through section 5004 of the California Food and Agriculture Code by way of the local county Agricultural Commissioner's office. The Inyo and Mono Counties' Agricultural Commissioner's Office invasive weed operations are facilitated by grants and agreements with landowners. Some examples of these agreements include:

- Baseline funding of \$32,000 from CDFA, provided to each of the 58 counties in California. This provides basic staffing hours for seasonal field staff.
- The agreement with the City of Los Angeles Department of Water and Power over the past seven years to control invasive plants on lands owned by this agency. This agreement includes \$200,000 annually for invasive plant monitoring and control.
- American Recovery and Reinvestment Act (ARRA) funding of \$254,000 to provide augmented staffing for use in several program areas over a two-year period.
- \$1,500 provided annually by the National Fish and Wildlife Foundation for invasive weed control in conjunction with California Department of Fish and Game within the environmentally sensitive Fish Slough Area.
- Over \$20,000 during a three-year period from the Nevada-based Walker River Basin Cooperative Weed Management Area group for work upstream of sensitive areas within the group's jurisdiction.

Various studies illustrate the value in maintaining a comprehensive monitoring program to prevent invasive plant establishment. Identifying and controlling these species early, when populations are not well established, can lower control costs significantly in future years. The Hidden Hills Solar Energy Generating System site must establish some manner of invasive plant program to avoid ecological and environmental damage from these threats. Bright Source will save resources by instituting a monitoring and control program to prevent the colonization and establishment of weeds.

Similar programs have been instituted successfully by the Inyo and Mono Counties Agricultural Commissioner's office in recent years, and the estimated cost to undertake such a project is \$50,000 per year. This includes monitoring and control activities, as well as travel to the Hidden Hills Solar Energy Generating System site. Although these travel costs are significant, catching and managing any invasive plant sites early will lessen future costs to Bright Source.



COUNTY OF INYO

Administrative Services
163 May Street
Bishop, California 93514

Date: January 11, 2012

To: Kevin Carunchio, Inyo County CAO
Gruen Gruen & Associates

From: Chuck Hamilton, Deputy County Administrator

Subject: **Revised – Impact Analysis for the Construction Phase of the Hidden Hills Solar Generation System (HHSEGS) – Inyo County Integrated Waste Management and Inyo County Motor Pool Programs**

Inyo County Integrated Waste Management Program

It is neither practical nor logical for the HHSEGS project to consider the Tecopa Landfill in Inyo County as a source for disposal of the non-hazardous solid waste generated during the construction phase of the project or during the 30-year planned operation phase of the completed facility.

The reasons for not authorizing the use of the Tecopa Landfill are numerous. The most obvious reason being that allowing the project to use the Tecopa Landfill would require revisions of the numerous facility planning documents, including, but not limited to, the Report of Disposal Site Information, the Preliminary Closure-Post-Closure Maintenance Plans, and the Source Reduction and Recycling Element. The Landfill Permit revisions alone could take up to 3-years to complete in order to accept any waste material without running the risk of operating the landfill out of compliance with the current Waste Discharge Requirements and Permit Restrictions.

The Tecopa Landfill is currently unmanned and lacks the infrastructure to accept waste debris in the volumes estimated by the project developer. The landfill is currently closed to the public, only accepting waste generated by the Inyo County Road Department as a result of local road maintenance projects.

Do to the fact that it is not recommended that the project utilize the Tecopa Landfill a financial impact analysis for the use of the landfill is not included in these Department impact comments.

Additional Potential Project Impacts

A local Tecopa resident is proposing to open a 300-space RV park to provide potential housing for the project employees during the 30-month construction phase and perhaps housing for the full-time employees during the operation phase of the project. If the RV Park is developed and occupied, a significant volume of solid waste will be generated. The RV park operator will be required to contract directly with the local permitted waste hauler for the solid waste removal and hauling services and not rely on the County of Inyo for waste removal assistance. An increase in the Tecopa population would likely have a secondary impact on the current waste services that are provided by the County for residents in the Tecopa area.

Impact Analysis – (HHSEGS)
Inyo County Integrated Waste Management
Motor Pool
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The County currently provides a number of waste collection bins spread throughout the community for use by the area residents at an annual cost to the County of \$52,316. With the proposed increase in the construction population the contract costs to the County would, in all likelihood, double. The waste would either need to be collected and removed more often (twice per week as opposed to once per week) or doubling the number of waste collection bins. The additional annual contract costs would be in excess of \$52,000.

Inyo County Motor Pool Program

Inyo County Motor Pool currently operates a fleet of 219 vehicles for use by County employees. During the 29-month construction it is anticipated that the combined trips to the project by County Departments could average one trip per week for the duration of the construction phase. This activity would certainly put an additional strain on the Motor Pool fleet operations.

A once per week round trip from Bishop to the project site would be an additional 530 miles per week impact to Motor Pool program costs. Motor Pool currently charges County Departments \$.54 per mile for use of a County Motor Pool vehicle. The additional weekly Motor Pool costs would be \$286.20, or an additional \$1,144.80 per month, multiplied by 29-months for a total additional cost to Inyo County Motor Pool of \$33,200.

Inyo County Motor Pool is charged with the purchase and expensing of all County vehicles (exception is the Road Department) for Departmental use. Motor Pool is aware that additional vehicle usage may occur beyond the estimate discussed above. There may be as many as three additional trips per week to the project site thereby increasing the costs to the Motor Pool program by an additional \$66,000.

Date: February 6, 2012

To: Kevin Carunchio, Dana Crom

From: Bob Harrington

Re: Water Department costs associated with Hidden Hills/Bright Source development

Principal potential costs to the Water Department concerning this project are:

1. Responsibilities and expenses related to state groundwater monitoring requirements may be affected by this project. Recent legislation requires that local governments monitor groundwater basins if they are subject to significant groundwater development. Presently, there is little groundwater development in the California portion of the Pahrump groundwater basin, which may allow the mandated monitoring to be somewhat relaxed; however, the Hidden Hills project will increase demand in the basin and likely lead to more stringent monitoring requirements from DWR. Since DWR's requirements are unknown, our costs are unknown, but could potentially be low five figures for initial monitoring program development, and several thousand dollars per year to conduct monitoring. **Plan development: \$10,000; annual cost: \$4,000-8,000.**
2. State DWR may deem that the County is ineligible for water grants and loans as a result of monitoring requirements not being met to DWR's satisfaction. The Water Department has received approximately \$330,000 in local groundwater assistance funding in the past ten years. Because the project increases groundwater development in a basin that currently is unmonitored, the project increases the County's risk of being deemed ineligible. This constitutes an annual average of about \$33,000 of grant funds that the County may have to forgo as a result of this project. **Annual cost of lost grant funds: \$33,000.**
3. Costs for implementing any monitoring and mitigation that may result from the CEC permitting process. We have provided a memorandum to the CEC describing potential impacts from the project on water-related resources, and outlined a monitoring and mitigation plan. Presuming the costs of developing a monitoring and mitigation plan, installation of necessary equipment, and model development costs are born by the project proponent, Water Department expenses would be a few thousand dollars per year for oversight of the plan. The overall cost of a monitoring and mitigation plan would be much higher – monitoring wells for this project could easily run into six figures, model development – a similar range, monitoring plan development around \$25,000. **Model development: \$120,000; plan development: \$25,000; annual monitoring cost: \$4,000-8,000.**