

CALIFORNIA ENERGY COMMISSION

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July 2, 2013

Captain Ray Wood
Riverside County Sheriff Department
260 North Spring Street
Blythe, CA 92225

California Energy Commission

DOCKETED
09-AFC-7C

TN 71496

JUL 02 2013

RE: Potential Law Enforcement Needs for the Proposed Petition to Amend the Energy Commission's Decision on the Palen Solar Power Plant (PSPP), now called the Palen Solar Electric Generating System (PSEGS) (09-AFC-7C)

Dear Captain Wood,

Palen Solar Holdings, LLC (PSH) (the project owner) is seeking a Petition to Amend the California Energy Commission's 2010 decision on the Palen Solar Power Plant (PSPP). PSPP was a 500-megawatt (MW) solar thermal power-generating facility utilizing parabolic trough technology. The PSPP encompassed approximately 4,366 acres located approximately one-quarter mile north of Interstate 10, approximately 10 miles east of Desert Center, and approximately halfway between the cities of Indio and Blythe, in Riverside County, California. The petition proposes to eliminate the use of solar parabolic trough technology approved under the Commission Decision and replace it with BrightSource's LPT solar power tower technology. Energy Commission staff's analysis considers the changes between the approved project (PSPP) and the amended project, now called the Palen Solar Electric Generating System (PSEGS). The PSEGS is essentially in the same location as the approved PSPP project, but will be reduced in size to approximately 3,794 acres. The PSEGS will be entirely on public land managed by the Bureau of Land Management (BLM). The changes from the approved PSPP to the PSEGS relevant to law enforcement services involve the construction and operations workforce numbers (including the peak and average number of workers) and duration of construction. The construction schedule for PSEGS would be 33 months rather than the approved PSPP's 39-month schedule. The construction workforce for the PSEGS would increase over the approved PSPP by 1,166 workers during peak construction, for a peak of 2,311 workers. The average number of construction workers for the PSEGS would increase by 432 workers, for an average of 998 construction workers. The operations workforce would decrease from 134 for PSPP to 100 for PSEGS.

Construction would occur in two phases and instead of starting in the fourth quarter of 2013, as identified in the Petition to Amend, construction would start in spring 2014 to allow desert tortoises to be cleared from the site. Commercial operation of the project is estimated in late 2016.

To assess impacts of the PSEGS project on law enforcement, Energy Commission staff requests information on existing law enforcement resources and services in the project area and the estimated need for additional services if the Petition to Amend is approved. A form is provided as an attachment to this letter with data needs and questions highlighted. Key characteristics of the PSEGS project that are considered applicable to law enforcement response needs assessment are briefly summarized on the enclosed form.

Recent communication with the Riverside County Sheriff's Department on another proposed solar project in eastern Riverside County (Rio Mesa Solar Energy Generation Facility) revealed sheriff's concerns for increased property theft at the project site. Specific measures such as fencing material, location of lighting, gates, signage, and a project site address would reduce the potential for crime. In addition, the Riverside County Sheriff's Department advised staff for the Rio Mesa Solar Energy Generation Facility that a "No Trespassing" letter should be on file at the sheriff station during construction and operation of the project. This letter would state the following: no one, other than employees, are permitted on the property; the owner or designee is requesting enforcement of trespass laws by the Riverside County Sheriff's Department; the owner or designee will testify in court; the property has been posted with "No Trespassing" signs; and contact information of the owner/designee. **Staff for the PSEGS project would like to know if your department has similar property theft concerns for the PSEGS and would you recommend a similar approach for the PSEGS.**

We understand the PSEGS project site is within the jurisdiction of the Riverside County Sheriff Department Colorado River Station. At the time the approved PSPP was under Energy Commission review, your department estimated an average response time to the PSPP site of 45-60 minutes and noted that depended on the severity of the incident and the location of the deputies on call. **Staff for the PSEGS would like to know if the 45-60-minute estimated response is still accurate.**

The Petition to Amend is available on the Energy Commission's website at:
http://www.energy.ca.gov/sitingcases/palen/compliance/2012-12-18_Pettition_to_amend_TN-68910.pdf.

Section 6.2 Socioeconomics would be the most pertinent section to review, as well as Section 6.3 Traffic and Transportation and Section 2.1 General Project Description.

Please provide your responses to the above questions and needs assessment form, including any comments you may have regarding law enforcement services for the PSEGS project by July 18, 2013 – I apologize for the short turn-around time. Send your responses to my attention (my contact information is below). Thank you in advance for your time and assistance.

Captain Wood
July 2, 2013
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Sincerely,



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Enclosures:

Local Law Enforcement Needs Assessment Form
Project Site Vicinity Map (from the Petition to Amend)
Construction Personnel and Traffic by Month (from the Petition to Amend)

cc. Christine Stora, California Energy Commission Compliance Project Manager
Amanda Stennick, Planner III/Supervisor

Law Enforcement Needs Assessment Form

Project Characteristics, as Proposed by the Project Applicant

Type, Location, Size, and Site Access:	Solar power generating facility proposed on 3,794 acres of land managed by the Bureau of Land Management located approximately ¼ mile north of Interstate 10, approximately ten miles east of Desert Center and approximately halfway between the cities of Indio and Blythe, in Riverside County, California. Primary access to the site during both construction and operation would be by a new 1,350-foot, 24-foot wide paved road from Corn Springs Road. The access road would be constructed from a point just north of the I-10 Corn Springs Road entrance/exit ramps east to the project site entrance. This road would include a 12-foot wide shoulder with gravel surface for truck staging to preclude traffic interferences.
Estimated Schedule:	If approved, the 33-month project construction would occur in two phases. The start of construction would likely begin in spring 2014 to allow desert tortoises to be cleared from the site. The second phase of construction would begin several months later. Commercial operation would likely begin in late 2016 due to the delay for tortoise clearing. The construction personnel needed by month is enclosed in this package and can be found in Appendix 2-C from the Petition to Amend.
Construction (Traffic and Work Force):	During the peak construction month (month 22), the construction workforce would total about 2,311 individuals. There would be an average total construction workforce of 998 individuals over the 33-month period. There would be an average of 790 day-shift construction workers over the construction period, with a peak of 1,700 day-shift workers. The average number of day-shift construction workers daily trips is 1,461 (assuming a 7.5 percent carpooling rate for the day shift workers) with a peak of 3,145 trips. Construction activities for the day shift would begin at 5 a.m. The project would generate an estimated an average of 20 daily truck trips, with a peak of 45 truck trips. Construction parking and project staging would be provided on the project site within the project boundaries.
Operation (Staff and Traffic):	The 100 full-time workers needed for the project are expected to be hired from within the regional workforce. The Petition to Amend did not provide an estimate on the number of passenger car trips that would be generated. Six truck trips are anticipated on a daily basis.
Security:	No security information for project construction or operation was provided in the petition to amend. Hazardous Materials Management staff has proposed two conditions of certification to require the preparation of a Construction Site Security Plan and an Operation Security Plan.

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:

Adopted or desired service standard (e.g., one sworn officer per 1,000 population) applicable to the project site:

Existing staffing levels for facilities serving the project area (including sworn officers and civilians, totals and per shift):

Estimated response times to the project site:
Priority calls:

Non-Priority calls:

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

Law Enforcement Needs Assessment Form

levels with the project:

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

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

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.

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.
 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:

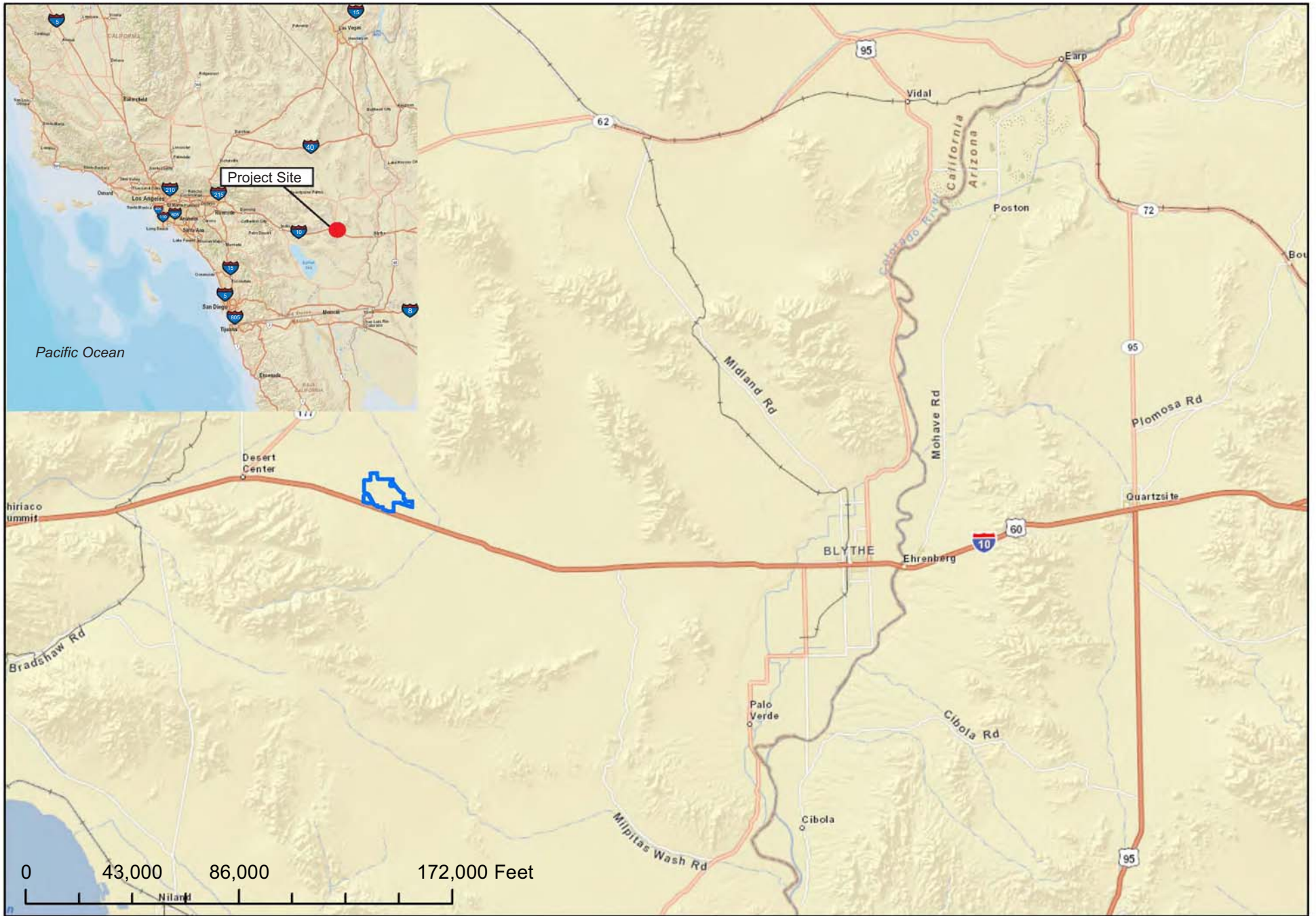
Do law enforcement personnel review development site plans for projects to assess potential law enforcement issues (e.g., lighting and other safety factors)? Please explain.

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.

Please explain any other law enforcement 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:



Legend

Palen Solar Electric Generating System



FIGURE NO. 2.1-1
SITE VICINITY MAP

