CALIFORNIA ENERGY COMMISSION 1516 NINTH STREET SACRAMENTO, CA 95814-5512 www.energy.ca.gov

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.

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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: <u>http://www.energy.ca.gov/sitingcases/palen/compliance/2012-12-18 Petition to amend TN-68910.pdf</u>.

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 Page 3 of 3

Sincerely,

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Lisa Worrall Planner II California Energy Commission Siting, Transmission, and Environmental Protection Division 1516 Ninth Street, MS 40 Sacramento, CA 95814 <u>lisa.worrall@energy.ca.gov</u>

Tele: (916) 654-4545 Fax: (916) 651-8868

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.
E	xisting Law Enforcement Resources and Services in the Project Area (attach additional paper if more room is needed to answer questions)
sheriff substations and distance of clo the project site: Adopted or desired	ses of the facilities (e.g.,) serving the project area, osest dispatch facility to d service standard (e.g., per 1,000 population) roject site:
	evels for facilities serving acluding sworn officers s and per shift):
Estimated respons	e times to the project site: Priority calls:
· ·	Non-Priority calls:
	needs (e.g., facilities and or meet existing service
	beyond those identified or meet existing service

Law Enforcem	nent Needs Assessment Form
evels with the project:	
Exchange of general law enforcement	and the second
esponsibilities (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):	
	forcement Services, Equipment, and Facilities 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-	
tite crimes against persons, theft of	
naterials, 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:	New Address of the second s
During project operation.	
Do law enforcement personnel review	
development site plans for projects to assess	
potential law enforcement issues (e.g.,	
ighting and other safety factors)? Please	
explain.	
Are specific measures recommended to	
educe the potential for crimes to occur at or	
hear 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	
his needs assessment form.	
	ting This Needs Assessment Form
Name:	
Title/Position:	
Telephone No:	
E-mail Address:	



Palen Solar Electric Generating System

SITE VICINITY MAP

											Con	struc	tion F	Perso	nnel a	and Tr	affic I	bv Mo	onth ¹															
CLIENT: BrightSource Industries	Israel																	,														BY:	CH	2M HILL
PROJECT: Palen Solar Electric Ger	erating Sy	/stem																														RE\	/:	0
DOCUMENT: 459892-PSEGS-DOC-00	06																															DATE	E: 4 DE	EC 2012
Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33 1	TOTAL
	10/1:		-		-	-	4/14	5/14	6/14	7/14					12/14		2/15	3/15	4/15		6/15		8/15				12/15	1/16	2/16	3/16	4/16		6/16	
PROJECT SITE				-	-		-			-				-																				
Craft Day Shift																																		
Boilermaker	0	0	4	4	5	7	9	11	11	11	12	14	30	33	45	53	64	84	110	139	163	192	191	179	152	126	98	73	53	38	30	26	16	1,967
Carpenters	1	3	8	10	16	30	50	57	67	79	82	93	88	90	87	82	78	73	69	63	53	52	44	36	33	28	23	17	13	11	9	8	5	1,453
Cement Finisher	0	3	1	2	2	5	7	8	10	12	13	13	13	13	13	13	13	11	10	9		7	6	5	4	4	3	2	1	1	1	1	1	213
Electrician	1	4	5	8	10	20	34	38	37	34	36	38	45	60	70	76	85	106	136	173	209	255	250	240	220	191	159	119	93	76	60	51		2,939
Iron Worker	0	0	0	5	10	3	13	18	26	35	41	49	53	59	64	67	72	77	81	82	76	75	65	52	53	42	33	24	17	13	11	11		1,227
Laborer Millwriabt	4	6	13	15 2	23	37 5	58	67 1	74	80 0	93 2	95 2	90 21	91 27	83 42	80 50	80 55	81 64	81 73	77 81	65 87	59 95	49 101	41 97	42 89	36 75	30 62	21 48	18 35	15 30	13 26	13 26		1,630 1,201
Millwright Equipment Operator	1	4	8	10		23	34	40	41	44	47	52	52	53	51	53	56	62	67	71	70	71	65	58	52	43	35	26	19	16	13	13		1,263
Pipefitter	0	0	11	13	17	33	41	40	51	57	63	69	80	89	104	119	141	179	226	272	314	368	361	339	294	247	200	146	110	88	67	59		4,204
Teamster	1	3	3	3	4	7	10	13	13	13	14	16	17	18	104	17	141	19	220	20	19	18	16	14	12	10	8	6	5	4	4	4	2	366
Craft-Day Shift Subtotal	8	23	53	72	103	170	257	299	331	365	403	441	489	533	576	610	662	756	873	987	1063	1192	1148	1061	951	802	651	482	364	292	234			16,463
Non-craft Day Shift ²																																		
Subcontractors	15	31	39	52	77	93	93	100	100	108	110	116	116	116	116	116	154	162	177	193	231	280	270	231	193	162	154	116	100	93	77	39	23	4,030
Owner + Others (non-manual)	13	13	27	28	32	47	64	66	70	75	84	93	99	103	104	104	105	108	108	108	108	111	107	107	94	93	91	65	56	44	35	27	16	2,389
Startup (non-manual) Labor	0	0	0	0	0	0	0	2	2	3	3	4	5	4	4	4	4	4	4	5	6	6	6	6	6	6	5	5	5	5	3	3	2	110
Compliance Support	77	77		29	29	29	29	29	29	29	29	29	29	29	29	77	77	29	29	19	19	20	10	10	5	5	5	5	5	5	5	5	3	861
Transmission Line	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	37	36	0	0	0	0	0	0	0	0	0	0	73
Gas Line	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	30	0	0	0	0	0	0	0	0	0	0	0	30
Linear Compliance Support	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	6	3	0	0	0	0	0	0	0	0	0	0	9
Non-craft Day Shift Subtotal	105			109		169	186	197	201	215	226	242	249	252	253	301	340	303	318	325	364	490	432	354	298	266	255	191	166	147	120	74		7,502
TOTAL PROJECT SITE DAY SHIFT	113	144	148	181	241	339	443	496	532	580	629	683	738	785	829	911	1,002	1,059	1,191	1,312	1,427	1,682	1,580	1,415	1,249	1,068	906	673	530	439	354	286	174	23,965
Craft Swing Shift							-				•					47			10	= 1						- 1	10			10	10	10	_	
Boilermaker	0	0	0	0	2	2	2	3	3	3	3	4	9	11	14	17	22	30	40	51	61	72	72	67	66	54	42	31	22	16	13	12	7	744
Carpenters	1	1	4	5	7	9	13	16	20	24	26	32	33 4	33	32	31	31	30	29	27	23	23	20	17	14	12	10	7	6	5 1	4	4	2	549
Cement Finisher Electrician	0	1	2	1	1	9	2 14	2 16	3 17	3 16	3 18	4 18	4 23	4 27	4 31	5 34	4 37	4 44	4 57	4 72	<u>3</u> 86	2	2 102	2 97	2 94	82	67	1 51	1 40	33	1 25	1 22	•	73
Iron Worker	0	0	0	0	5	19	22	25	27	33	35	35	38	40	42	44	46	44	51	51	49	51	46	40	23	18	14	10	40	6	5	4	2	834
Instrument Tech	0	0	0	0	0	13	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	0	0	0	0	0	0	0	0	0	228
Laborer	2	5	6	6	8	3	12	16	12	21	25	27	28	29	27	27	27	28	30	28	24	23	18	15	18	15	13	10	8	7	6	6	4	536
Millwright	0	0	0	0	1	9	10	10	10	10	10	11	16	18	24	26	28	32	36	40	42	46	48	46	38	32	27	21	15	13	12	12	7	643
Equipment Operator	0	2	3	4	6	6	11	13	14	15	17	19	19	21	21	21	23	26	29	31	30	31	28	26	22	18	15	11	9	7	6	5	3	509
Pipefitter	0	0	6	7	9	2	9	11	13	15	20	21	24	28	35	40	48	64	81	100	119	140	137	126	124	107	86	64	47	37	29	24		1,573
Teamster	0	0	1	1	2	2	3	4	4	4	6	6	6	6	6	6	6	7	7	8	7	7	6	5	5	4	3	2	2	2	1	1	1	130
Craft-Day Shift Subtotal	3	10	23	27	46	74	110	128	141	156	175	189	212	229	248	263	284	325	376	424	456	511	491	453	406	343	278	208	157	127	102	91	54	7,066
Non-craft Swing Shift ²																																		
Subcontractors	4	8	10	13	19	23	23	25	25	27	29	29	29	29	29	29	39	40	44	48	58	70	67	58	48	40	39	29	25	23	19	10	6	1,008
Owner + Others (non-manual)	3	4	7	7	8	12	15	16	17	19	23	23	25	26	26	26	26	27	27	27	27	28	27	27	24	23	23	16	13	11	9	7	4	599
Startup (non-manual) Labor	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	1	1	1	1	1	2	2	2	2	2	1	1	1	1	1	1	1	1	29
Non-craft Swing Shift Subtotal	7	12	17	20	27	35	38	41	43	47	53	53	55	56	56	56	66	68	72	76	87	100	96	87	74	64	63	46	39	35	29	18	11	1,636
TOTAL PROJECT SITE SWING SHIFT	10	22	40	47	73	109	148	169	184	203	228	242	267	285	304	319	350	393	448	500	543	611	587	540	480	407	341	254	196	162	131	109	65	8702
SUBTOTAL ONSITE	123	166	188	228	314	448	591	665	716	783	857	925	1,005	1,070	1,133	1,230	1,352	1,452	1,639	1,812	1,970	2,293	2,167	1,955	1,729	1,475	1,247	927	726	601	485	395	239	32,667
OFFSITE LINEARS																																		
Transmission Line	0	3				35	39	28	10	10	6	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	156
Gas Line	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2	12	12	12	12	12	8	0	0	0	0	0	0	0	0	0	72
Linear Compliance Support	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	6	6	6	6	7	4	4	4	0	2	0	0	0	0	0	45
TOTAL OFFSITE LINEARS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	5	29	40	61	18	19	12	4	4	0	2	0	0	0	0	0	273
TOTAL WORKFORCE	123	166	188	228	314	448	591	665	716	783	857	925	1,005	1,070	1,133	1,230	1,357	1,457	1,668	1,852	2,031	2,311	2,186	1,967	1,733	1,479	1,247	929	726	601	485	395	239	32,940
Car Pool % (Day-shift Only) ³	7.5%		101	450	000	000	070	400	400	500	F 40	500	004	070	704	000	000	0.47	4070	1100	1010	1100	4 4 0 0	4000	44.40	000	040	000	400	202	040	050	450	04 054
Worker (day shift) Worker Vehicles	100 93	131 121			209 193	292 270		428 396	460 426	502 464		586 542	634	678		803	893			1199			1428		1149 1063		810 749	603 558	469 434					21,254 19,660
													586	627	667	743	826	876	998	1109	1215											237	144	

												Con	struc	tion F	Perso	nnel a	and T	raffic	by Mo	onth ¹															
CLIENT:	BrightSource Industries Isr	ael																															BY	: (CH2M HILL
PROJECT:	Palen Solar Electric Genera	ating Sys	tem																														RE	V:	0
DOCUMENT:	459892-PSEGS-DOC-006																																DAT	E: 4	DEC 2012
	Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	TOTAL
		10/13	11/13	12/13	1/14	2/14	3/14	4/14	5/14	6/14	7/14	8/14	9/14	10/14	11/14	12/14	1/15	2/15	3/15	4/15	5/15	6/15	7/15	8/15	9/15	10/15	11/15	12/15	1/16	2/16	3/16	4/16	5/16	6/16	
Monthly True	ck Traffic																																		TOTAL
Equipment	& Materials	35	35	440	440	420	407	472	438	411	112	120	133	148	141	137	165	171	135	127	122	98	94	91	65	55	43	36	28	28	10	8	6	4	5,136
Concrete ⁴		0	20	40	0	0	0	0	0	0	0	0	0	0	0	0	0	0	20	10	10	10	10	5	5	0	0	0	0	0	0	0	0	0	130
Heliostat C	Components	0	0	0	0	245	245	245	245	245	245	246	246	246	246	246	246	246	245	245	245	245	245	245	0	0	0	0	0	0	0	0	0	0	4,662
TOTAL TRUC	CK TRAFFIC	35	55	480	440	665	652	717	683	656	357	366	379	394	387	383	411	417	400	382	377	353	349	341	70	55	43	36	28	28	10	8	6	4	9,928
Average Dai	ly Trucks (rounded)	2	3	30	28	42	41	45	43	41	22	23	24	25	24	24	26	26	25	24	24	22	22	21	4	3	3	2	2	2	1	1	0	0	
Notes: ¹ Bas	Iotes: ¹ Based on revised Hidden Hills Project Data submitted to CEC on 1 October 2012																																+		
² Non-craft workers are the non-union superintendents and construction personnel on site.																																			
³ Car I	³ Car Pool includes Day-shift Craft Workers + Subcontractor Non-craft Workers + Compliance Support																																		
	crete deliveries based on cond							-																											