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FRESNO COUNTY FIRE

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Dustin Hail
Fire Chief
Fresno County Fire Protection District
January 29, 2025

Drew Bohan
Executive Director
715 P Street
Sacramento, CA 95814

Dear Drew Bohan,

I am writing to provide feedback regarding the Environmental Impact Report (EIR) for the Darden Clean Energy Project (23-OPT-02), specifically concerning worker safety and fire protection.

After reviewing the proposal, I have identified several concerns related to the ability of Fresno County Fire Protection District (FCFPD) to adequately respond to emergencies at the project site. The distance from key FCFPD stations, the limited staffing at certain locations, the complexity of responding to large-scale emergencies in this remote area, as well as auxiliary impacts near the site, all contribute to a significant challenge. Response times in the given area are extended and any new burden would further exasperate this issue. Response times are further compromised to incidents such as large fires or technical rescues where resources on a standard response would come from surrounding stations that have an even greater distance away. The greater response times typically yield higher dollar damage and losses, as well as delayed treatment for any medical emergencies. The infrastructure at our existing stations is not sufficient to handle the additional demands created by this project, and more resources will be necessary to help reduce risk at the site, as well as ensuring current service levels are not negatively impacted.

Key concerns include:

1. **Response Times and Staffing:** The response times from current stations would be excessive for effective fire suppression, rescue efforts and medical care. Additionally, the staffing levels at some stations are insufficient to respond effectively to the scale, and or frequency, of emergencies that could occur at the project site or in surrounding areas related to the increase in potential.

2. **Station Infrastructure:** Existing stations are not equipped to house the additional apparatus, such as water tenders and four-wheel-drive fire apparatus, that would be needed for an appropriate response to this project. Existing stations are also limited on space for the personnel required to staff the additional apparatus. A new station in close proximity to the project area is required to meet fire protection needs with permanent 24/7 staffing.
3. **Water Supply:** The proposed water tank is inadequate to supply sufficient water for the anticipated duration of a fire, especially given the size and potential hazards of the project. Due to the inhalation hazard related to a fire on site hydrants may not be accessible even for small fires. Mobile water tenders would be necessary to ensure a sustainable water supply for the entire site. The water tender would need to be permanently staffed to increase reliability and depth of resources while providing for the necessary water requirements.
4. **Impact on Emergency Services:** The location and scale of the project will place a significant strain on FCFPD's current resources, potentially compromising our ability to respond to other emergencies in the county. This includes increased vehicle accidents from construction vehicles and material transport vehicles, medical emergencies, and other incidents related to the project's construction, as well as threats from normal daily operations.
5. **Training and Planning:** Additional training and planning will be required to ensure all responders are adequately prepared for the unique hazards posed by this facility, including fire suppression, technical rescue scenarios and hazardous materials responses.
6. **Auxiliary Impacts:** This project is in an area that is prevalent to vegetation fires due to the open range lands and often grow rapidly due to the daily high winds. With a project of this scope and size, the threat of a fire occurring within the facility and extending into adjacent lands or a fire occurring on adjacent lands spreading into the facility are greatly heightened due to increased potential of annual grass and noxious weeds growing under the solar panels and within the facility. Due the design features of this facility, standard fire suppression techniques would not be effective and would require a change in tactics and operations to effectively mitigate the incident as well as protect exposures.
7. **Loss Revenue Impact:** Being a special district, FCFPD is predominantly funded through property taxes. 62% of the FCFPD jurisdiction falls into the Williamson Act which is a suppression of property taxes for certain identified parcels within the Fire District, which could be as high as an 80% suppression rate. This specific project is 100% within Tax Exempt parcels which correlates to \$0 of revenue for fire protection services. When incidents occur at this site, this would remove a resource from paying constituents and place it on an emergency that pays \$0 for services. A project of this scope and size adds a tremendous response burden, as opposed to the bare land that it is currently there.

FCFPD looks forward to working with IP Darden to remedy the previously stated concerns. FCFPD requires that IP Darden and FCFPD enter into a Fire Protection Agreement to address the following identified needs:

1. Establish a new fire station and staffing near the project site to provide appropriate response times and capabilities for the life of the project and/or until returned to bare soil.
2. In conjunction with other projects contribute to increasing staffing levels at key adjacent stations to ensure effective coverage for the life of the project and/or until returned to bare soil.
3. In conjunction with other projects implement additional mobile water supply options to support fire suppression efforts throughout the project site for the life of the project until returned to bare soil.
4. In conjunction with other projects contribute to upgrade capital infrastructure at adjacent facilities to accommodate apparatus and ensure access to all areas of the project site for the life of the project until returned to bare soil.
5. In conjunction with other projects contribute to portions of other impacted positions such as emergency dispatchers, safety officers, and fire and life safety inspectors for the life of the project until returned to bare soil.

We urge the Energy Commission to consider these recommendations to ensure that emergency services can be maintained throughout FCFPD as well as respond effectively and safely to any incidents at the Darden Clean Energy Project.

Thank you for your attention to these important matters. I look forward to your response.

Sincerely,



Dustin Hail
Fire Chief
Fresno County Fire Protection District