



# RIVERSIDE COUNTY FIRE DEPARTMENT

In cooperation with the  
California Department of Forestry and Fire Protection

210 West San Jacinto Avenue • Perris, California 92570 • (951) 940-6900 • Fax (951) 940-6910

John R. Hawkins  
Fire Chief

Proudly serving the  
unincorporated  
areas of Riverside  
County and the  
Cities of:

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Calimesa  
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Coachella  
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Desert Hot Springs  
❖  
Indian Wells  
❖  
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❖  
Lake Elsinore  
❖  
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❖  
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October 27, 2010

California Energy Commission  
John Kessler, Project Manager  
1515 9<sup>th</sup> Street, MS 46  
Sacramento, CA 95814-5512

## DOCKET

**09-AFC-10**

DATE OCT 27 2010

RECD. OCT 27 2010

### RE: Rice Solar Energy Project Fire Needs Assessment (09-AFC-10)

Dear Mr. Kessler,

This letter is written in response to the Fire Needs assessment for the Rice Solar Energy Project located in Riverside County.

With respect to the referenced project, the Riverside County Fire Department has the following comments:

After reviewing the Fire Needs Assessment for the Rice Solar Plant Project, the Riverside County Fire Department (RCFD) does not support the proposal from the Pacific Development Solutions Group. There are a number of areas that require further evaluation to support the applicants justification for a "No Response" from the Riverside County Fire Department. In addition, there are a number of pre-and post-incident reporting procedures that are Federal/State mandated and shall be completed by the Authority Having Jurisdiction. The documentation and reporting process is accomplished through a coordinated effort and is the responsibility of the Incident Commander.

The Fire Needs Assessment is inaccurate and incomplete and does not support the Applicant's proposal to eliminate the need for a response from the Riverside County Fire Department. There are numerous assumptions, proposals and no factual data to support the Fire Needs Assessment.

The Strategic Planning Bureau has identified cumulative and potential impacts to the department's level of service and has established operational plans to deal with emergency incidents. The revised document does not address contingency plans in the event whether or not onsite or offsite resources are available for response. Therefore, a response would revert back the Authority Having Jurisdiction and the Riverside County Fire Department would be required to provide a response. The Fire Needs Assessment only touches the surface of the identified impacts. The document reviewed by the (RCFD), dated October 25, 2010 does not provide an accurate detailed analysis or conclusion to support their findings.

In addition, the Fire Needs Assessment does not appear to follow the Laws, Ordinances, Regulations and Standards (LORS) of the County of Riverside or the Operational Policies of the Riverside County Fire Department. The Fire Needs Assessment references a limited number of (LORS). The Riverside County Fire Department has Local, State and Federal mandates for reporting that will initiate a response from the local Authority Having Jurisdiction.

The Riverside County Fire Department is requesting staff to reinstate the original cost figures reflected in the initial matrix docketed August 4<sup>th</sup> 2010.

OR

The Riverside County Fire Department is requesting a third party review to analyze the impacts and provide a complete, detailed comprehensive Fire Needs Assessment.

The proposed project will have a cumulative adverse impact on the Fire Department's ability to provide an acceptable level of service. These impacts include an increased number of emergency and public service calls due to the increased presence of structures, traffic and population.

With any additional construction within a response area, a “**cumulative**” increase in requests for service will add to the Fire Department's ability to provide adequate service. The proposed project identifies approximately 1, 410 acres of land, the construction of 17,500 tracking heliostats, and a receiving tower with an overall height of 653 feet. The proposed commercial development at build out, will have a significant impact on the fire department's ability to provide an adequate level of service.

Based on the adopted Riverside County Fire Protection Master Plan, the Category IV – Outlying, specifies that a full alarm assignment be operating on the fire ground within 30 minutes and the fire station to be located within 8 miles. The primary station serving this area would **not** be within the 8 mile objective. These times are approximate based on conditions and currently **do not** meet the Outlying Land Use protection goals.

The California Fire Code outlines fire protection standards for the safety, health, and welfare of the public, the citizens and Firefighters of Riverside County. These standards will be enforced by the Fire Chief.

If I can be of further assistance, please feel free to contact me at (951) 940-6349 or e-mail at [jason.neumann@fire.ca.gov](mailto:jason.neumann@fire.ca.gov)

Sincerely,

Jason Neuman

Fire Captain

Strategic Planning Bureau

October 27, 2010

Jason Neumann, Fire Captain  
CAL FIRE / Riverside Unit/Strategic Planning Division  
210 West San Jacinto Avenue  
Perris, California 92570

Dear Captain Neumann,

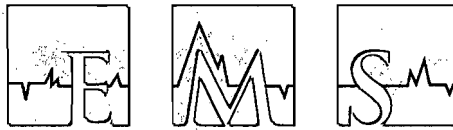
Regarding the letter dated October 26, 2010, you requested clarification on the first two points of EOA ALS transport and EOA sub-contractor transport and the use of 9-1-1. Our position is that anytime a patient is transported from a scene the 9-1-1 system is activated. The only difference in this scenario is that ground transport is already on scene. Regardless if the transport is ALS ground or air, or BLS the 9-1-1 system will be activated. Once the patient is in route the ECC shall be notified by the transporting agency of the fact that there is no longer a patient on scene. It will then be the Fire Department's decision to proceed or cancel. This process maintains the integrity of the EMS system with the patient's needs at the forefront. It also allows for the notification to the Fire Department that the facility possibly has had a change in there onsite medical aid status.

I hope this answers your questions. Please feel free to contact me of any further questions or comments.

Thank you for your time and attention.



Cindi Stoll, RN, BSN, CEN  
Trauma/HEMS/EMS-C System Manager



October 26, 2010

Jason Neumann, Fire Captain  
 CAL FIRE / Riverside Unit/Strategic Planning Division  
 210 West San Jacinto Avenue  
 Perris, California 92570

Dear Captain Neumann,

Thank you for including us in the review of the Rice Solar Energy Project Fire (and EMS,) Needs Assessment. We have reviewed the document and find several areas of concern. The Needs Assessment does not fit within our policies, procedures or protocols. In the table below we outline our recommendations to meet the medical needs of the construction and operations phases.

As a point of clarification, due to the Exclusive Operating Areas in Riverside County and the recommendation of Advanced Life Support level of service within the Needs Assessment, Blythe Ambulance Company would be the ALS provider. If they are unable to provide the required service they would sub-contract to another Riverside County ALS GROUND permitted provider.

ALS non-transport level of service may be provided by our County Fire Department by virtue of an ALS First Responder.

Basic Life Support may be provided by any BLS permitted provider within the County.

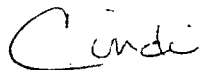
First Aid may be provided by an RN, LVN, EMT, EMT-P or an individual trained in first aid. There must be employer policies to guide practices, the EMT-P may not be identified as such and the equipment and supplies must be limited to first aid.

Location within document	Response	Recommendation
Exec. Summary, p 8, Bullet point #1.  Exec. Summary, p 9, Bullet point #4.  4.3, pg 4-6, Bullet point #1.  6.0, pg 6-2, Bullet point #1.  6.0, pg 6-4, 1 <sup>st</sup> paragraph	Health and Safety Code 1797.178: No person or organization shall provide ALS or limited ALS unless that person is or organization is an authorized part of the EMS system of the local EMS agency.	On site medical aid to be addressed within one of the following: <ol style="list-style-type: none"> <li>1. EOA ALS provider to provide onsite services w/ transport.</li> <li>2. EOA provider sub-contracts to another Riv Co. permitted provider for ALS w/ ground transport.</li> <li>3. Riv Co permitted BLS provider with ground transport.</li> <li>4. Fire Department ALS 1<sup>st</sup> responder w/o transport.</li> <li>5. RN or First Aid personnel, (EMT-P not recognized) with limited 1<sup>st</sup> aid equipment and supplies.</li> </ol>

Location within document	Response	Recommendation
<p>Exec Summary, pg 8, Bullet point #2</p> <p>4.3, pg 4-7, Bullet point #1</p> <p>6.0, pg 6-2, Bullet point #2</p>	<p>Air medical can only be requested &amp; dispatched through the county dispatch system.</p> <p>Riverside EMS policy 5130:5.5. DISPATCH OF EMS AIRCRAFT</p> <p>In order to provide for a uniform system of dispatch of EMS aircraft, and to prevent potential problems with the dispatch of more than one EMS aircraft, the Riverside County Fire Department is designated as the Coordinating Agency for the dispatch of EMS aircraft. Requests for an air ambulance or rescue aircraft shall be made through the Emergency Command Center (ECC) of the Riverside County Fire Department located in Perris.</p>	<p>The onsite medical aid practitioner shall call 911 for a full EMS response for a critically ill or injured patient. The ECC is able to auto launch an air craft due to the rural/remote location of the project, with an anticipated ETA fly time of 35 minutes to the site.</p>

Please feel free to contact us for any questions or comments at 951-358-5029.

Sincerely,



Cindi Stoll, RN, BSN, CEN  
Trauma/HEMS/EMS-C System Manger