



**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:

Banning
❖
Beaumont
❖
Calimesa
❖
Canyon Lake
❖
Coachella
❖
Desert Hot Springs
❖
Indian Wells
❖
Indio
❖
Lake Elsinore
❖
La Quinta
❖
Moreno Valley
❖
Palm Desert
❖
Perris
❖
Rancho Mirage
❖
Rubidoux CSD
❖
San Jacinto
❖
Temecula

Board of Supervisors

Bob Buster,
District 1

John Tavaglione,
District 2

Jeff Stone,
District 3

John Benoit,
District 4

Marion Ashley,
District 5

December 13, 2010

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

RE: Rice Solar Energy Project Presiding Members Proposed Decision (09-AFC-10)

Dear Mr. Kessler,

The Riverside County Fire Department appreciates the opportunity to submit comments on the Presiding Members Proposed Decision for the Rice Solar Energy Project located in the unincorporated area of Riverside County.

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

The Presiding Members Proposed Decision, item D WORKER SAFETY AND FIRE PROTECTION

Summary and Discussion of the Evidence

Page 4 lists:

In the event of a major fire, fire support services, including trained firefighters and equipment for a sustained response, would be provided by the Riverside County Fire Department. (Ex. 200, p. 6.14-17.) Local fire support services are under the RCFD jurisdiction. Station 43 would be the first responder with a response time of approximately one hour and 15 minutes. The next closest station would be Lake Tamarisk Station #49, with a response time of about one hour. RCFD fire stations are staffed full-time with a minimum of three personnel per shift which include paramedics. (Exs. 200, p. 6.14-17; 202, p. 6.14-20.)

Change the primary responding station from Station 43 to Station 49. Change the next closest station from Station 49 to Station 43. The response time

**DOCKET
09-AFC-10**

| | |
|-------|-------------|
| DATE | DEC 13 2010 |
| RECD. | DEC 13 2010 |

for engine 49 is approximately 1:00 hour to 1:15 after dispatch. The second unit, engine 43 will respond to the project area in approximately 1:30.

WORKER SAFETY-1 page 5 lists:

Even with implementation of the above-described Conditions of Certification, a fire and other incidents could occur and require response from RCFD. Staff and Applicant agree that RCFD is capable of providing necessary non-fire-related emergency services and fire related services to RSEP with existing infrastructure, personnel, and equipment. (10/29/10 RT 138-139, 173.) Staff nonetheless explained that under RCFD standard procedures, when RCFD responds to a confirmed fire, rescue or hazardous materials incident, it sends out at least three engines and nine firefighters. (Ex. 200, p. 6.14-23.) To ensure the dispatch of the required number of engines and firefighters, RCFD has to dispatch engines and personnel from other stations. RCFD then “backfills” the

The Riverside County Fire Department will send a response based on the severity of the incident. The Riverside County Fire Department’s Standard Response Plan includes a first alarm dispatch of 6 engines, 1 Breathing Support, 1 Squad and 1 Battalion Chief with a staffing of 22 firefighters to a confirmed fire. If the magnitude of the incident deteriorates, augmented resources will be required to assist with the command and control efforts. The additional resources will be dispatched from the lower Coachella Valley, Palm Desert and Indio. This situation will create a drawdown of resources in the area, requiring the open stations to be “backfilled” or covered with other engines outside the area. The mobilization of equipment from outside the service area will have an adverse cumulative impact on the fire departments ability to provide service in other areas of the county. When dealing with “non-fire-related emergencies” at the Rice Solar Plant, the same draw down of resources will occur due its remote location.

WORKER SAFETY-1 page 6 lists:

According to Staff, the long travel times to the RSEP site (just over two hours each way) and time spent addressing the emergency situation, will prolong the durations during which back filling of responding stations would be required. While this could potentially adversely impact response capability at other fire stations, Staff asserts that the "potential for a large conflagration does not exist at RSEP. Hence, the potential for an event requiring a large enough response from RCFD to cause a significant drawdown of RCFD resources to to significant impacts service levels to the rest of the county would be extremely unlikely." (Ex. 200, pp. 6.14-21, 6.14-24.) This determination is supported by the record.

The "potential" for an emergency incident to occur at the Rice Solar Plant is real. The potential will be reduced once the plant is decommissioned, demolished and the last piece of heavy equipment is demobilized off the former Rice Army Air Field property. The potential for an event requiring a large enough response from RCFD to cause a significant drawdown of RCFD resources to have a significant impact on service levels to the rest of the county is extremely likely. Every fire department in the State of California is part of the California Disaster And Civil Defense Master Mutual Aid Agreement.

"Mutual Aid" is utilized when an emergency incident is likely to exceed, or has exceeded, the ability of a responsible entity to control it. The basic assumptions are that a local government entity has taken all actions within its capacity to mitigate a potential or ongoing emergency, and has reasonably exhausted local resources before requesting outside assistance through the California Fire Service and Rescue Emergency Mutual Aid System. (CAL EMA)

For example, if a major wildland fire, riot, terrorist attack etc. were to occur in other areas of the state, units from the Riverside County Fire Department may be requested to assist the local fire departments and other governmental agencies. The units assigned to other incidents outside of the area in conjunction with a local emergency at the Rice Plant would create a significant impact on the department's ability to provide service.

Emergency Medical Services

The applicant has proposed the following mitigation on page 7

Contracting with a Riverside County Emergency Medical Service certified company to provide Advance Life Support with equipment and supplies during the construction and operation phases.

Maintaining on-site presence of a Basic Life Support Ambulance with a California-certified driver for use during construction-related medical emergency events.

Contracting with an air medical service to respond to a service request from one of above-described on-site responders – during construction and operation. (Ex. 50, pp. 6.-2 – 6.3.)

The approval of on-site Emergency Medical Technicians and Paramedics will be determined by the Riverside Emergency Medical Service Agency (REMS).

Contracting with an air medical provider will require the approval of REMS and the Riverside County Fire Department. The Perris Emergency Command Center (ECC) is the Operational Area Coordinator for all aero-medical resources in the county of Riverside. The Perris ECC will dispatch and coordinate the mobilization of all aero medical resources and assumes responsibility of these resources. When the ECC dispatches an aero medical resource, two paramedic engines are also dispatched for a medical aid response, incident command, scene safety, landing zone coordination, crash fire rescue, patient loading, scene security and ensuring the safety of fire personnel.

The Riverside County Fire Department has Local, State and Federal mandates for reporting incidents that occur at commercial facilities. The Authority Having Jurisdiction is required to forward information within hours after the termination of the incident. The incident commander is responsible for obtaining the required information. In order to obtain complete, detailed and accurate information regarding the incident a response from the RCFD shall be required. Based on the complexity of the incident, resources will have extended commitment times, requiring stations to be backfilled or covered. This situation will create a drawdown of resources throughout the county, requiring the assistance of other engines from outside the area.

CONDITIONS OF CERTIFICATION

WORKER SAFETY-7 page 15 lists:

WORKER SAFETY-7 The project owner shall fund its project-related share of cumulative impacts by paying the County of Riverside development as required by Condition of Certification **LAND-6**, property taxes, and a one-time payment of \$570,000.

Verification: At least thirty (30) days prior to the start of site mobilization, the project owner shall provide to the CPM documentation that the amount of \$570,000 has been paid to the RCFD.

The Riverside County Fire Department will not accept a letter of credit from the applicant in lieu of the "one-time" payment.

WORKER SAFETY-9 page 15 lists:

an EMT-P (Paramedic) who is certified by Riverside Emergency Services (REMS) along with the appropriate equipment and supplies;

a Advanced Life Support Ambulance with a California certified driver for use during medical emergency events; and

a contract with an air medical service to respond to a request from an onsite EMT-P.

The certification of personnel and equipment requirements are based on approval from the Riverside Emergency Medical Service Agency (REMS).

At the present time the Riverside County Fire Department will not acknowledge a request for air medical resources from an unidentified or unauthorized source, i.e. on-site staff member/employee or an EMT-P. The request for an aero medical resource will originate from the Incident Commander at the scene to prevent the unnecessary utilization of personnel and equipment.

WORKER SAFETY-10 page 16 lists:

an EMT-P who is certified by Riverside Emergency Services (REMS) along with the appropriate equipment and supplies; and

a contract with an air medical service to respond to a request from an onsite EMT-P.

The certification of personnel and equipment requirements are based on approval from the Riverside Emergency Medical Service Agency (REMS).

At the present time the Riverside County Fire Department will not acknowledge a request for air medical resources from an on-site staff member/employee or an EMT-P. The request for an aero medical resource will originate from the Incident Commander to prevent the unnecessary use of personnel and equipment.

The applicant continues to address the lack of “need for a response” or a “no response necessary” from the fire department by implementing mitigation measures utilizing onsite rescue teams, EMT’s, Paramedics and specialized equipment. For example, onsite rescue teams have Local, State and Federal mandates for training, pre incident planning, incident command, record keeping, standard operating procedures and resource support. The Rice Solar energy Plant will be required to establish a plan. One element of that plan will identify local resources for support and assistance in the event the on-site rescue team cannot successfully handle the emergency. Generally, that plan will identify and list the local Authority Having Jurisdiction (AHJ). The AHJ is the Riverside County Fire Department.

In the event of a rescue incident at the Rice Solar Energy Plant that exceeds the capabilities of the on-site rescue team, the Riverside County Fire Department will have to respond, render aid and assist with the rescue efforts. The ECC will make the determination as to which resources or types of resources will be dispatched to the incident. Again, this situation will create a drawdown of resources in the area, requiring open stations to be “backfilled” or covered with other engines from outside the area.

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 volume 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 at build out.

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 Riverside County Fire Department understands that the intent of these provisions is to lessen the cumulative impacts to the fire department. If in fact the condition cannot be placed in effect, a provision should be made to provide ongoing mitigation fees equivalent to the anticipated cost that the applicant would have paid for 24/7 coverage over the life of the project

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

Sincerely,
Jason Neuman
Jason Neuman
Fire Captain
Strategic Planning Bureau