

California Energy Commission
1516 NINTH STREET
SACRAMENTO, CA 95814-5512
www.energy.ca.gov



July 19, 2013

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



RE: Potential Law Enforcement Needs for the Proposed Petition to Amend the Energy Commission's Decision on the Blythe Solar Power Project (BSPP) (09-AFC-6C).

Dear Captain Wood,

The Energy Commission staff are contacting you to determine if the Riverside County Sheriff's Department has any new or revised needs associated with the proposed changes to the Blythe Solar Energy project.

NextEra Blythe Solar Energy Center, LLC (the project owner) is seeking a Petition to Amend the California Energy Commission's 2010 decision on the Blythe Solar Power Project (BSPP). The approved project was a 1,000-megawatt (MW) solar thermal power-generating facility utilizing parabolic trough technology. The approved project encompassed approximately 7,043 acres located approximately two miles north of U.S. Interstate 10 (I-10) and eight miles west of the city of Blythe in an unincorporated area of Riverside County. The Blythe Airport is about one mile south of the site. The petition proposes to eliminate the use of solar parabolic trough technology approved under the Commission Decision and replace it with photovoltaic (PV) solar technology. Energy Commission staff's analysis considers the changes between the approved project and the amended project. The amended project is essentially in the same location as the approved project, but will be reduced in size to approximately 4,070 acres and is designed to generate a total of approximately 485 MW of electricity. The BSPP will be entirely on public land managed by the Bureau of Land Management (BLM).

The changes from the approved project to the amended project 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 the amended project would be 48 months rather than the approved project's 69-month schedule. The construction workforce would be reduced from an average of approximately 604 daily construction workers, with a peak daily workforce of 1,004, to an average of 250 to 430 daily construction workers, with a peak daily workforce of 619. The operations workforce would decrease from about 221 permanent, full-time employees to 15 to 20 permanent, full time employees. Temporary personnel would be employed, as needed, during seasonal periods when panel washing is required.

Construction would occur in four phases and if all applicable approvals and permits have been obtained, could begin as soon as early June 2014.

Staff's previous analysis of the project concluded that current law enforcement capacity should be sufficient for construction and operation. **With the reduction in construction duration and number of workers for construction and operation now proposed, are staff's conclusions still appropriate?**

If the conclusions are no longer appropriate,, 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 enclosed with this letter with data needs and questions highlighted. Key characteristics of the amended 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 Electric Generating 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 Electric Generating 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 BSPP project would like to know if your department has similar property theft concerns for the BSPP and would you recommend a similar approach for the BSPP.**

We understand the BSPP project site is within the jurisdiction of the Riverside County Sheriff's Department Colorado River Station. At the time the approved project was under Energy Commission review, your department estimated an average response time to the BSPP site of 10 to 30 minutes and noted that depended on the severity of the incident and the location of the deputies on call. **Staff for the amended BSPP would like to know if the 10 to 30 minutes estimated response is still accurate.**

The Revised Petition to Amend is available on the Energy Commission's website at: http://www.energy.ca.gov/sitingcases/blythe_solar/pv_amendment/rev-amendment/.

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

Please advise staff if the original conclusions that no new or expanded law enforcement facilities or staff levels are required, or provide your responses to the above questions and needs assessment form, including any comments you may have regarding law

Captain Wood
July 19, 2013
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enforcement services for the amended BSPP project by August 5, 2013. Send your responses to my attention (my contact information is below). Thank you in advance for your time and assistance.

Sincerely,
Original signed by Amanda Stennick

Steven Kerr
Planner II
California Energy Commission
Siting, Transmission, and Environmental Protection Division
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Sacramento, CA 95814
skerr@energy.ca.gov

Tele: (916) 651-0483
Fax: (916) 651-8868

Enclosures:
Local Law Enforcement Needs Assessment Form
Project Features Map (from the Petition to Amend)
Project Phasing Map (from the Petition to Amend)

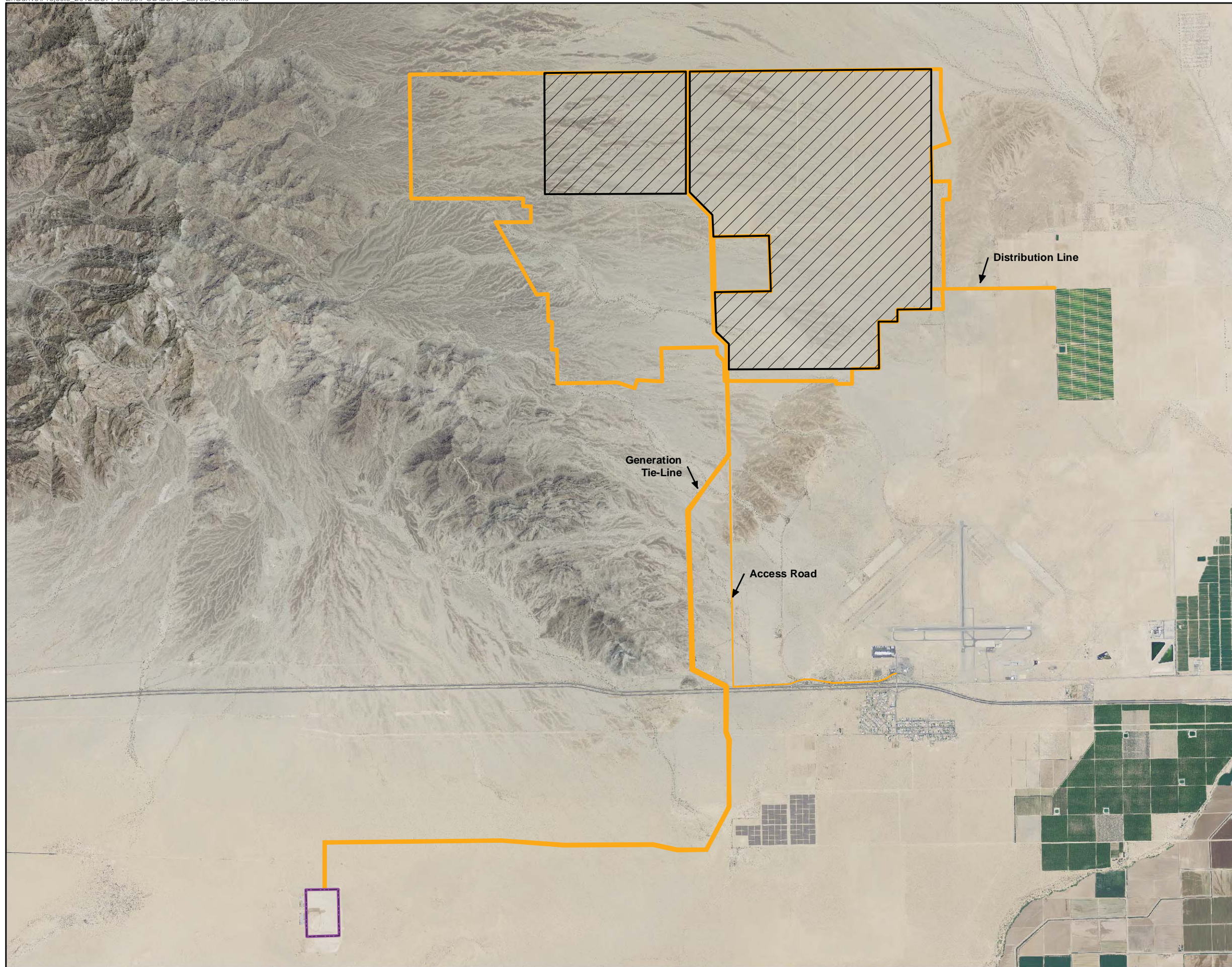
cc. Mary Dyas, California Energy Commission Compliance Project Manager
Amanda Stennick, Planner III/Supervisor

| 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 4,070 acres of land managed by the Bureau of Land Management located located approximately two miles north of U.S. Interstate-10 (I-10) and eight miles west of the City of Blythe in an unincorporated area of Riverside County, California. The Blythe Airport is about one mile south of the site. The modified project would utilize the same existing roads to reach the site as described in the previous approval. Access to the BSPP would be via a new road (Dracker Drive) heading north from the frontage road (Black Rock Road). Dracker Drive would be accessed from a section of Black Rock Road, along I-10, from the plant access road to the Airport/Mesa Drive exit. The road would be paved from the entrance off of Black Rock Road north to the gates opening to Unit 1 and Unit 4. |
| Estimated Schedule: | If approved, the 48-month project construction would occur in four phases. The start of construction would likely begin in June 2014. |
| Construction (Traffic and Work Force): | The construction workforce would be an average of 250 to 430 daily construction workers, with a peak daily workforce of 619 with a peak workforce of approximately 619 employees during Months 20 through 22 of the construction period. Construction is expected to occur Monday thru Friday 7:00 am to 10:00 pm. Most construction equipment and vehicles would be brought to the BSPP at the beginning of the construction process during construction mobilization and would remain on site throughout the duration of the construction activities for which they were needed. Generally, the equipment and vehicles would not be driven on public roads while in use for the Project. In addition to construction worker commuting vehicles, construction traffic would include periodic truck deliveries of materials and supplies, recyclables, trash, and other truck shipments. Truck access to the site would be from I-10 and then via Mesa Drive Road to Black Rock Road. Construction truck deliveries and shipments would typically avoid the peak traffic hours in the morning and evening. Construction parking and project staging would be provided on the project site within the project boundaries. Temporary construction fencing would surround this area and the guard shack would be manned to provide security during construction. |
| Operation (Staff and Traffic): | The operations workforce would be 15 to 20 permanent, full time employees. Temporary personnel would be employed, as needed, during seasonal periods when panel washing is required. The Petition to Amend did not provide an estimate on the number truck trips are anticipated on a daily basis. |
| Security: | <p>For public safety and site security, the BSPP would have fencing around the site and access would be controlled via gates located at the entrances to the facility consistent with the Approved Project. The two main site gates (located at Units 1 and 4) would be either a motor-operated swing or rolling-type security access gate, and would be monitored through a security camera, swipe card, or other mechanism that would control and monitor access. There would be a guard shack at the main facility gate during construction. Access through the main gates would be controlled during construction and operation of the BSPP to prevent unauthorized access to the solar plant site. All facility personnel, contractors, and visitors would be logged in and out of the facility. A secondary access gate, similar in construction to the main gate, would be used for emergency purposes only. A fire department Knox Box or other access device and emergency contact placard would be provided at the main gate and secondary access gate to provide emergency access.</p> <p>Fencing would be installed around the solar plant site perimeter, substations, and around the evaporation pond described in accordance with the existing Conditions of Certification. Individual units may be fenced with perimeter fencing as the construction and operation of the facility is phased. Security fencing would be chain-link, approximately 8 feet tall, with 3-strand barbed wire. Some modifications would be needed in areas of storm water inflow and outflow from the solar field to allow for high flow events. The security fencing would be constructed slightly inside the solar plant site boundary to allow room for on-foot fence maintenance on the outside of the fence if necessary. Fencing would be designed to resist all wind or other loads imposed on the fence.</p> |
| Existing Law Enforcement Resources and Services in the Project Area (attach additional paper if more room is needed to answer questions) | |

| Previous Law Enforcement Needs Determined for the 2010 Blythe Solar Power project * | New or Revised Needs for the 2013 Blythe Solar Power project | |
|---|---|--|
| Names and addresses of the facilities (e.g., sheriff substations) serving the project area, and distance of closest dispatch facility to the project site: | Riverside County Sheriff's Department Colorado River Station 260 North Spring Street, Blythe, CA | |
| Adopted or desired service standard (e.g., one sworn officer per 1,000 population) applicable to the project site: | 1 per 1,000 | |
| Existing staffing levels for facilities serving the project area (including sworn officers and civilians, totals and per shift): | Not identified | |
| Estimated response times to the project site: Priority calls: Non-Priority calls: | 10 to 30 minutes depending on the severity of the call | |
| 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 levels with the project: | Not identified | |
| Exchange of general law enforcement responsibilities (e.g., formal and/or informal agreements with local municipalities for provision of services) in the project area: | Not identified | |
| Current inventory of specialized equipment (e.g., helicopters or other aircraft): | Not identified | |
| 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. | Not identified | |




| | | |
|--|----------------|--|
| <p>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.</p> <p>During project construction:</p> <p>During project operation:</p> | No | |
| <p>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.</p> <p>During project construction:</p> <p>During project operation:</p> | No | |
| <p>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.</p> | Not identified | |
| <p>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.</p> | Not identified | |
| <p>Please explain any other law enforcement concerns that have not been addressed by this needs assessment form.</p> | Not identified | |
| Person Completing This Needs Assessment Form | | |
| <p>Name:</p> <p>Title/Position:</p> <p>Telephone No:</p> <p>E-mail Address:</p> | | |

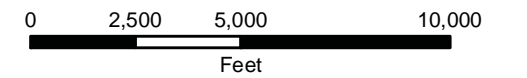
*information for this column was obtained from the 2009 Blythe Application for Certification and personal communication.



BLYTHE SOLAR POWER PROJECT RIVERSIDE COUNTY, CA

Legend

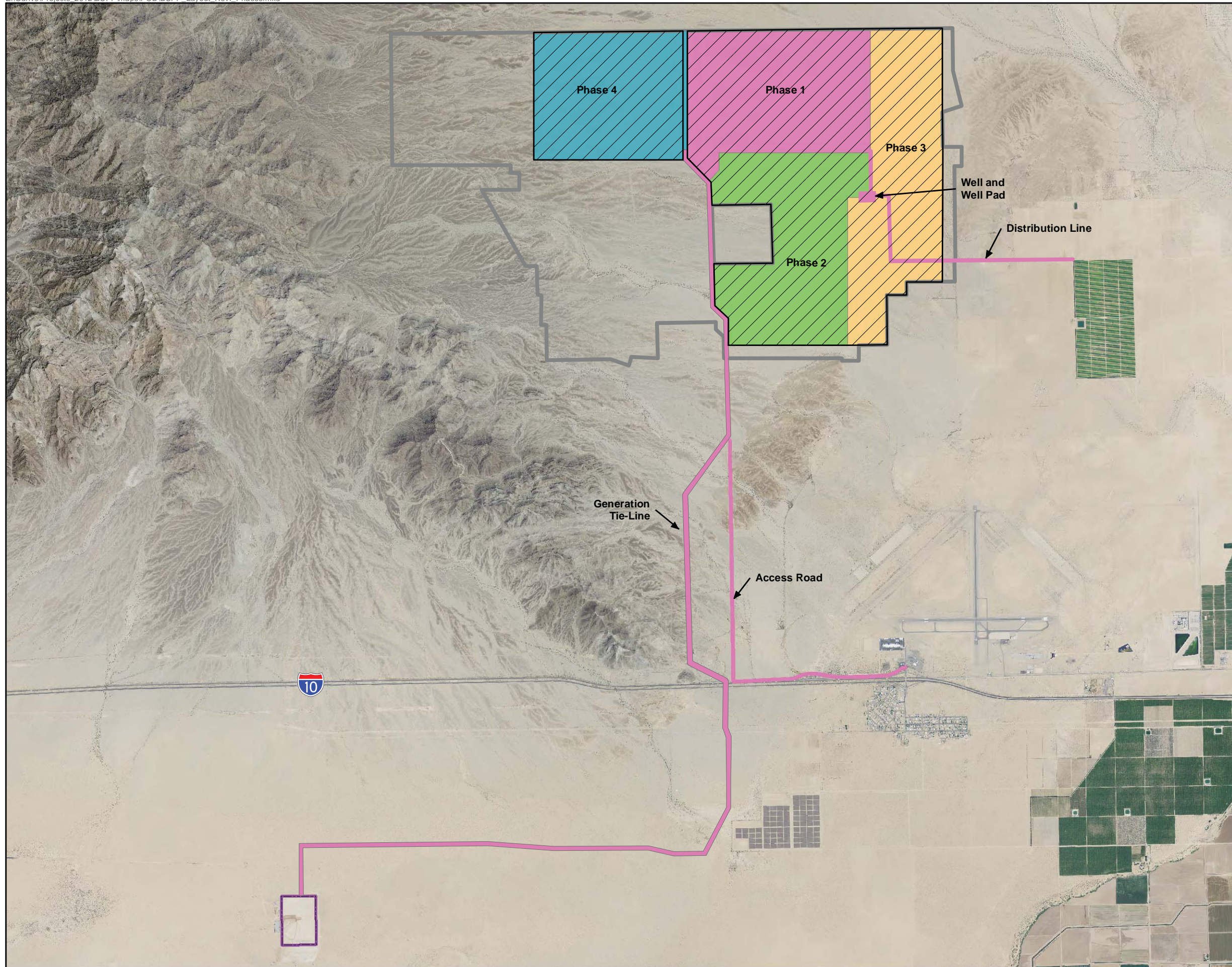
-  Approved Solar Thermal Project Boundary/Features
-  Modified Project- PV Technology, 4,070 acres (Reduced from 6,831 acres)
-  SCE Colorado River Substation



Notes:
(a) UTM Zone 11, NAD 1983 Projection.
(b) Source data: USDA, Tt, Worley Parsons

FIGURE 2-2
PROJECT FEATURES

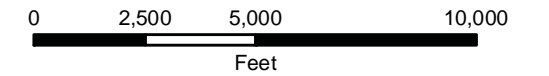




BLYTHE SOLAR POWER PROJECT RIVERSIDE COUNTY, CA

Legend

- Approved Solar Thermal Project Boundary
- Modified PV Solar Plant Site
4,070 acres (reduced from 6,831 acres)
- SCE Colorado River Substation
- Project Phasing
 - Phase 1
 - Phase 2
 - Phase 3
 - Phase 4



Notes:
(a) UTM Zone 11, NAD 1983 Projection.
(b) Source data: USDA, TTEC

FIGURE 2-3
PROJECT PHASING