

CALIFORNIA ENERGY COMMISSION

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



September 30, 2011

DOCKET

11-AFC-2

DATE SEP 30 2011

RECD. SEP 30 2011

Undersheriff Keith Hardcastle
Inyo County Sheriff's Department
P.O. Box S
Independence, CA 93526

RE: Potential Law Enforcement Needs for the Proposed Hidden Hills Solar Electric Generating Systems (HHSEGS) Project (11-AFC-2)

Dear Undersheriff Hardcastle,

Hidden Hills Solar I, LLC, and Hidden Hills Solar II, LLC (the applicant), are seeking a license from the California Energy Commission to construct and operate a power generation facility. The Hidden Hills Solar Electric Generating System (HHSEGS or proposed project) is proposed on approximately 3,277 acres (5.12 square miles) of privately owned land in Inyo County, California, along the California-Nevada border and approximately 18 miles south of the town of Pahrump, Nevada.

HHSEGS proposes two solar fields and associated facilities: the northern solar plant (Solar Plant 1) and the southern solar plant (Solar Plant 2). Each solar plant would generate 270 megawatts (MW) gross (250 MW net), for a total net output of 500 MW.

To assess impacts of the proposed project on emergency medical services, 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 project is approved. A form is provided as an attachment to this letter with data needs and questions highlighted. Key characteristics of the applicant's proposed project that are considered applicable to law enforcement response needs assessment are briefly summarized on the form. A map of the project site is also attached.

From our review of the project's Application For Certification (AFC), we understand the applicant is working with your office to ascertain any requirements and reduce any potential project impact to law enforcement services. We also understand that there is one sheriff station in the town of Shoshone and the response time from Shoshone is approximately 30 minutes to 1 hour. However, the AFC also notes that if the response originates from the station on Highway 127, the response time would be 1.5 hours to 2 hours. Response to the project site would likely originate from the location of the officers who are normally on patrol and on call in the service area, and according to the AFC, the response time could range from 0.5 hour to 3 hours.

We have a few questions in addition to the enclosed needs assessment form:

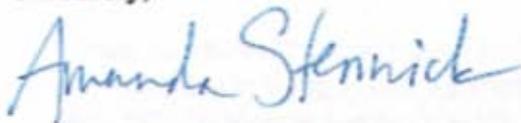
1. Can you clarify what the response time would be from the sheriff station in Shoshone? The AFC seems to indicate a response time of 30 minutes to 1 hour and then reports a response time of 1.5 hours to 2 hours.

2. Beside the California Highway Patrol and Nevada Highway Patrol, who is the primary law enforcement agency for state highways and roads and does the Inyo County Sheriff's Department have any other law enforcement resources that could respond to law enforcement calls at the project site?

The project applicant's entire AFC is available at the Energy Commission's website: < <http://www.energy.ca.gov/sitingcases/hiddenhills/documents/applicant/afc/>>. Section 5.10 Socioeconomics would be the most pertinent section to review, as well as Section 5.16 Worker Health and Safety.

Please provide your responses to the above questions and the needs assessment form and include any comments you may have regarding law enforcement services for the proposed project by February 2, 2012. Send your responses to my attention (my contact information is below). If you have questions regarding the proposed project or this request, please contact Lisa Worrall of my staff at (916) 654-4545 or by e-mail at: lworrall@energy.state.ca.us. Thank you in advance for your time and assistance.

Sincerely,



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Enclosures:
Local Law Enforcement Needs Assessment Form
Map showing the approximate location of the project site (from the AFC)

cc. Mike Monasmith, California Energy Commission Project Manager

Law Enforcement Needs Assessment Form	
Project Characteristics, as Proposed by the Project Applicant	
Type, Location, Size, and Site Access:	Power generating facility proposed on 3,277 acres in Inyo County, California, along the California-Nevada border. Primary site access would be from Tecopa Road (Old Spanish Trail Highway) from the project entrance road at the east side of the project. Secondary access would also be from Tecopa Road at the west side of the project, then along the paved road between the two solar plants.
Estimated Schedule:	Construction of the power generating facility, from site preparation and grading to commercial operation, would take approximately 29 months. If approved, construction would begin the third quarter of 2012 and conclude the second quarter of 2015. The two solar plants would be constructed concurrently with a planned three-month delay between their start dates. See Table 2.2-2 in the Project Description Section of the AFC for a list of the project schedule major milestones.
Construction (Traffic and Work Force):	Construction would generally occur between 5 a.m. and 3:30 p.m. with swing shift during heliostat assembly from 6:00 p.m. to 4:00 a.m. During the peak construction month (month 14), approximately 2,744 daily trips would occur. Of these daily trips, truck traffic accounts for 834 trips. The truck trips are assumed to be spread out equally throughout the day (from 6 a.m. to 6:00 p.m.). These trips are only the trips for the project site and do not include the trips related to the construction of the transmission line and gas line (as they are off-site). The number of workers per day range from 35 in month 29 to 1,033 in month 14. The highest numbers are predicted during construction months 13 through 16. The peak number of workers on-site is during month 14 with a projected 1,033 workers. Overall, there is a 1-year period where the number of workers is within approximately 20% of the peak.
Operation (Staff and Traffic):	The project would employ approximately 120 full-time workers resulting in approximately 240 daily trips. Only 40 employees are required for the daytime shift (80 trips) and the remaining 80 employees would work an evening shift. The evening shift employees would likely travel outside of the peak commute period.
Security:	A 12-foot-wide unpaved path would be constructed on the inside perimeter of the project boundary fence for use by HHSEGS personnel to monitor and maintain perimeter security. The AFC does not discuss any other proposed on-site security measures.
Existing Law Enforcement Resources and Services in the Project Area (attach additional paper if more room is needed to answer questions)	
Names and addresses of the facilities (e.g., sheriff substations) serving the project area, and distance of closest dispatch facility to the project site:	
Adopted or desired service standard (e.g., one sworn officer per 1,000 population) applicable to the project site:	
Existing staffing levels for facilities serving the project area (including sworn officers and civilians, totals and per shift):	
Estimated response times to the project site:	
Priority calls:	
Non-Priority calls:	
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:	

Law Enforcement Needs Assessment Form

Exchange of general law enforcement responsibilities (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):

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.

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.
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:

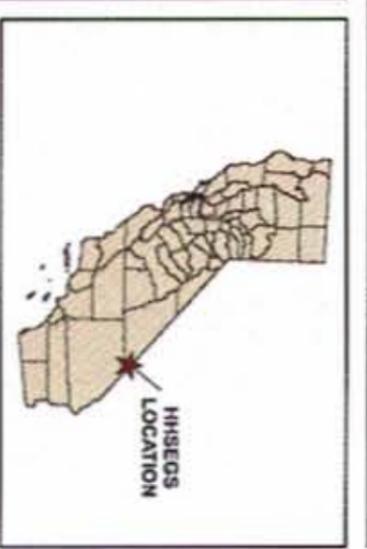
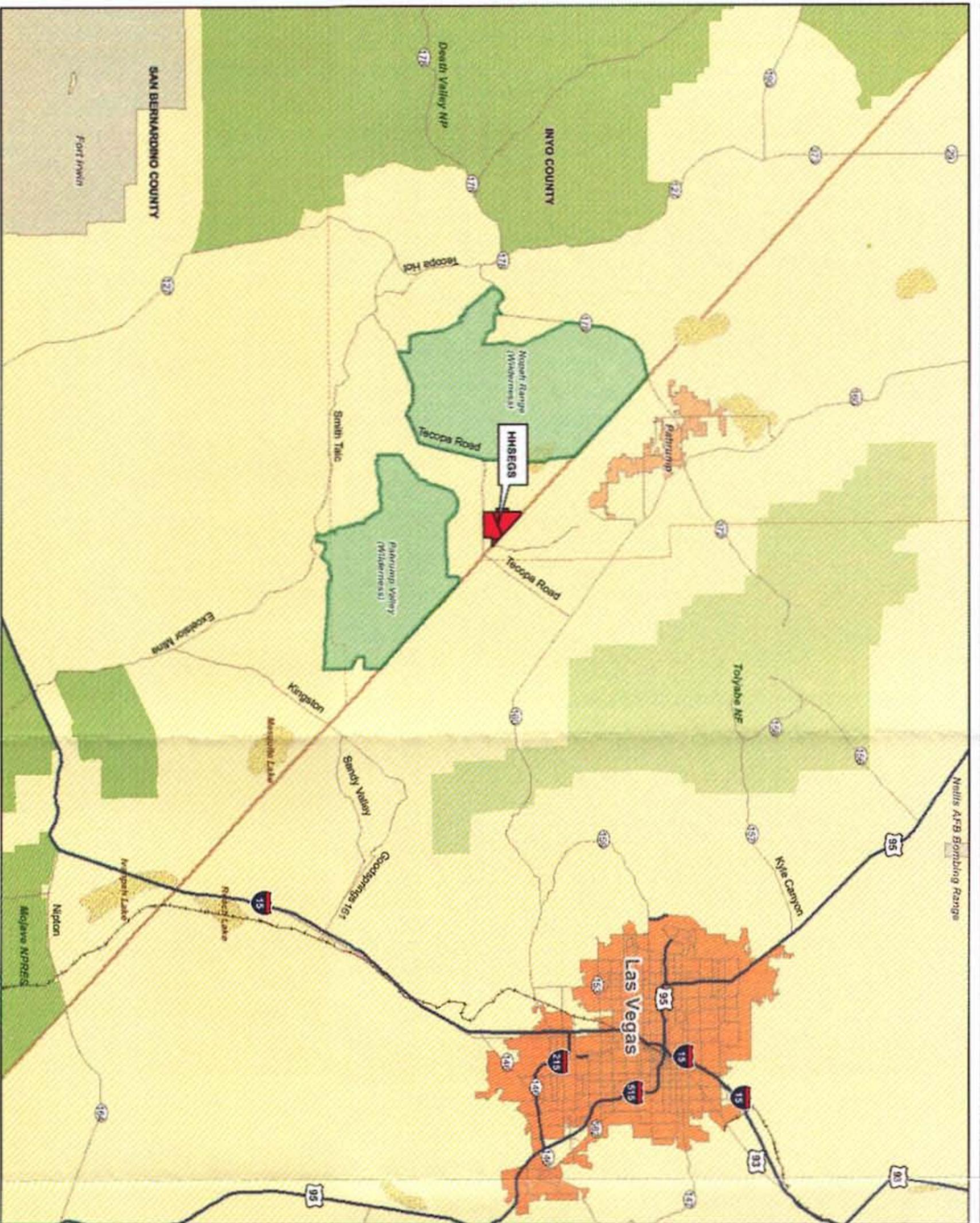
Do law enforcement personnel review development site plans for projects to assess potential law enforcement issues (e.g., lighting and other safety factors)? Please explain.

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.

Please explain any other law enforcement concerns that have not been addressed by this needs assessment form.

Person Completing This Needs Assessment Form

Name:
Title/Position:
Telephone No:
E-mail Address:



- LEGEND**
- Major Freeways
 - Major Road
 - State Boundary
 - County Boundary
 - Major Railroad Lines
 - National Parks/ Forests
 - Military Installation
 - Dry Lake
 - Urban Areas
 - Wilderness Area
 - HHSEGS Boundary



FIGURE 2.1-1
Vicinity Map
Hidden Hills Solar Electric Generating System