3.1.6 Public Services

This section discusses potential impacts to public services, including fire protection, police protection, schools, and parks, resulting from the implementation of the Proposed Project. The analysis is based on the review of existing resources, technical data, and applicable laws, regulations, and guidelines, as well as the following technical reports prepared for the Proposed Project:

- Draft Fire Protection Plan – Jacumba Solar Energy Project (Appendix 2.4-2)

For a discussion regarding wildfire hazards and hazards associated with interference with emergency response resulting from implementation of the Proposed Project please refer to Section 2.4, Hazards and Hazardous Materials. A discussion on parks and recreation services can be found in Section 3.2.4, Parks and Recreation.

Comments received in response to the Notice of Preparation (NOP) included concerns regarding fire capabilities. These concerns are addressed in this section. A copy of the NOP and comment letters received in response to the NOP is included in Appendix 1-1 of this EIR.

3.6.1.1 Existing Conditions

The Proposed Project would be located in the Mountain Empire Subregion of southeastern San Diego County (County), an approximately 285,000-acre, largely rural, low-density population area.

Baseline public services information was obtained through obtaining PDS 399 forms from service providers, a review of the *Final Environmental Impact Report (EIR) / Environmental Impact Statement (EIS) for the East County (ECO) Substation, Tule Wind, and Energia Sierra Juarez Gen-Tie Projects* (CPUC and BLM 2011) and the *Soitec Solar Portfolio Project, Emergency Service Capabilities Assessment and Cumulative Impact Mitigation* report (Dudek 2013), as well as several websites as cited below.

Regional Overview

Fire Protection

As stated in Section 2.4, Hazards and Hazardous Materials, the Proposed Project is located in southeastern San Diego County, a rural area with few residents that is also within an area statutorily designated as Very High Fire Hazard Severity Zone by the California Department of Forestry and Fire Protection (CAL FIRE). The very high fire hazard severity designation can be attributed to a variety of factors including highly flammable, dense, drought-adapted chaparral vegetation; seasonal, strong winds; and a Mediterranean climate that results in vegetation drying during the months most likely to experience Santa Ana winds. Santa Ana winds are winds originating from the Great Basin that create extreme fire weather conditions characterized by low humidity, sustained high speeds, and extremely strong gusts. These conditions can lead to

extremely intense and fast-moving fires that cannot be contained until winds shift or wane. Additionally, the fire environment in San Diego County is considered one of several areas that are classified as "wildfire corridors" because a large portion of the fuel bed in the County has not burned in 40 years or more. Thus, though the Project is located in a rural area with few residents where the number of fires is fewer than in a more urban setting, appropriate responses to fires when they do occur is crucial to avoiding catastrophe. (For more information on the existing fire hazard in the Project area, refer to Section 2.4, Hazards and Hazardous Materials.)

There are several fire stations that are owned and staffed by San Diego County Fire Authority (SDCFA), CAL FIRE, San Diego Rural Fire Protection District (SDRFPD), and U.S. Forest Service (USFS) within the Proposed Project area. Bureau of Land Management (BLM) lands within San Diego County are under a Direct Protection Agreement with CALFIRE, which specifies that CALFIRE provides fire response resources and is responsible for conducting investigations regarding the recovery of fire suppression costs. BLM firefighting resources include firefighters, engines, dozers, and similar resources. However, BLM's firefighting resources may respond from greater distances. In southeastern San Diego County, USFS firefighting facilities can be co-located with firefighting operations of other jurisdictions such as CAL FIRE and San Diego County to share resources. During extended wildland fire attack, federal resources can be mobilized throughout the country as necessary (see Appendix 2.4-2).

Additionally, the area has a mutual-aid agreement with the Campo Indian Tribe for fire protection services. The Campo Reservation Fire Station is located at 36190 Highway 94 (see Appendix 2.4-2). Table 3.1.6-1, Primary Study Area Fire Resources, lists the local fire stations and the agencies that supply/staff them.

The fire emergencies that may occur at the Proposed Project site would be primarily responded to by SDRFPD Jacumba Fire Station, which is approximately 3 miles west of the Project site. Additional response would be from SDCFA's Boulevard and Campo Fire Stations, CAL FIRE's Whitestar Station and Campo Station, SDRFPD's Lake Moreno Fire Station, and from mutual aid resources from throughout the state, when necessary.

Fire history data provides valuable information regarding fire spread, fire frequency, ignition sources, and vegetation/fuel mosaics across a given landscape. One important use for this information is as a tool for pre-planning. It is advantageous to know which areas may have burned recently and therefore may provide a tactical defense position, what type of fire burned on the site, and how a fire may spread. According to available data from CAL FIRE (2014),[1] no fires have burned on the Project site since the beginning of the historical fire data record.

[1] Based on polygon geographic information system (GIS) data from CAL FIRE's Fire and Resource Assessment Program (FRAP), which includes data from CAL FIRE, USFS Region 5, BLM, the National Park Service, Contract Counties, and other agencies. The data set is a comprehensive fire perimeter GIS layer for public and private lands throughout the state and covers fires 10 acres and greater between 1878 and 2013.

Fire history for the Project vicinity indicates that smaller fires are more likely in this portion of the County, relative to those occurring in more dense fuels and mountainous terrain to the west in the Laguna and Cuyamaca Mountains (Cleveland National Forest). Seven fires have burned within 3 miles of the Project site over the historical fire data record, three of which burned within 0.5 mile of the Project site.

Based on an analysis of this fire history data set, specifically the years in which the fires burned, the average interval between wildfires in the area (includes areas up to roughly 5 miles from the Project site) was calculated to be 5.2 years, with intervals ranging between 1 and 14 years. Based on this analysis, it is expected that wildfire that could impact the facility may occur, if weather conditions coincide, roughly every 5 to 6 years with the realistic possibility of shorter interval occurrences, as observed in the fire history record. Further, the large expanses of open space surrounding the Project site and potential ignition sources along Interstate 8 and Old Highway 80 contribute to increased potential risk and wildfire hazard in the area.

For more information on fire protection in the Proposed Project area and applicable fire protection laws and regulations, see Section 2.4, Hazards and Hazardous Materials, and Appendix 2.4-2, *Draft Fire Protection Plan – Jacumba Solar Energy Project.*

Police Protection

Police protection in the Proposed Project area is served by the San Diego County Sheriff's Department, California Highway Patrol (CHP), and U.S. Customs and Border Protection (CBP).

The San Diego County Sheriff's Department (Department) provides general patrol and investigative services to several incorporated cities and all unincorporated areas in the County, including the communities of Jacumba and Boulevard. The Department includes approximately 4,000 sworn and professional employees and is responsible for patrolling a service area of approximately 4,200 square miles (San Diego County Sheriff's Department 2012a). The nearest sheriff's office to the Proposed Project site is located at 39919 Highway 94 in Boulevard. This office, which is a satellite office to the Pine Valley Substation, serves an area over 200 square miles, and a population of over 2,000 people (San Diego County Sheriff's Office 2012b). Five sheriff's deputies work out of the Boulevard Sheriff's Office, each having their own patrol car. They patrol for 10-hour daily shifts and, depending on the day, between two and five of them will be on patrol at the same time. They are required to live in the area, and when their shift is over they remain on call until the next day's shift begins (McFadden, pers. comm. 2013). The Department is currently meeting response time goals for rural areas at the Boulevard Sheriff's Office (Clough, pers. comm. 2013). The next closest sheriff's office substation to the Proposed Project site is the Campo Substation located at 378 Sheridan Road in Campo (San Diego County Sheriff's Office 2012b).

CHP separates the state into eight patrol divisions or areas. The Proposed Project area is located within the CHP's Border Division, which is headquartered in the Clairemont Mesa community of San Diego, and maintains 12 area offices. The closest CHP offices to the Proposed Project area are located in the cities of El Cajon and El Centro (CHP 2012).

CBP also maintains a strong presence in southeastern San Diego County. The Boulevard CBP Station, formerly a substation of the Campo CBP Station, is located at 39701 Avenida de Robles Verdes in the unincorporated community of Boulevard. The Campo CBP Station is located at 32355 Old Highway 80 in the unincorporated community of Pine Valley. The Boulevard station is responsible for a patrol area of 500 square miles and two eastbound tactical checkpoints (CBP 2012a). CBP officers at the Boulevard CBP Station patrol east of Jewel Valley Road to the County border with Imperial County. CBP officers at the Campo station patrol from Jewel Valley Road west to Pine Valley Road (Cook 2013). Therefore, the Proposed Project is located in the patrol area of the Boulevard CBP Station.

Schools

Public schools and educational facilities are mandated by the State Department of Education and administered by the San Diego County Board of Education and the San Diego County Office of Education. The Mountain Empire Unified School District serves the Proposed Project area, and includes six elementary schools, one senior high school, and three alternative education schools.

Other Public Services

Other public services include hospitals and library services.

There are no major hospitals located in southeastern San Diego County. The closest major hospital is Sharp Grossmont Hospital, located approximately 50 miles west of the Proposed Project site in the City of La Mesa. The El Centro Regional Medical Center, owned by the City of El Centro, is located approximately 40 miles east of the Proposed Project site in Imperial County (Google 2012).

Several branch libraries of the San Diego County Library System are located in the Mountain Empire Subregion. The Jacumba Branch is located in the community of Jacumba at 44605 Old Highway 80. Nearby branches of the San Diego County Library system include the Campo–Morena Village branch (located at 31466 Highway 94 in Campo, approximately 22 miles west of the Project site) and the Potrero branch (located at 24883 Potrero Valley Road in Potrero, approximately 35 miles west of the Project site) (County of San Diego 2012).

3.1.6.2 Regulatory Setting

Federal Regulations

There are no federal regulations, plans, or standards related to public services that are relevant to the Proposed Project.

State Regulations

There are no state regulations, plans, or standards related to public services that are relevant to the Proposed Project. For information on fire protection regulations, see Section 2.4.2.

Local Regulations

San Diego County General Plan

Updated (and adopted) in August 2011, the San Diego County General Plan guides future growth in the unincorporated areas of the County and considers projected growth anticipated to occur within various communities. The General Plan, in particular the Land Use, Conservation and Open Space, and Safety elements, contain policies which address public services in the County. Policies relevant to public services are listed below.

Land Use Element

- **Policy LU-12.1: Concurrency of Infrastructure and Services with Development.** Require the provision of infrastructure, facilities, and services needed by new development prior to that development, either directly or through fees. Where appropriate, the construction of infrastructure and facilities may be phased to coincide with project phasing.

Safety Element

- **Policy S-3.4 Service Availability.** Plan for development where fire and emergency services are available or planned.
- **Policy S-6.3 Funding Fire Protection Services.** Require development to contribute its fair share towards funding the provision of appropriate fire and emergency medical services as determined necessary to adequately serve the project.
- **Policy S-6.4 Fire Protection Services for Development.** Require that development demonstrate that fire services can be provided that meet the minimum travel times identified in Table S-1 (Travel Time Standards) (20 minutes in the semi-rural and rural land use designations).

Mountain Empire Subregional Plan

The Mountain Empire Subregional Plan (a component of the County General Plan) establishes goals and policies to guide development within the areas of Tecate, Potrero, Boulevard, Campo/Lake Morena, Jacumba, and the Mountain Empire Balance which together comprise the Mountain Empire Subregion of southeastern San Diego County. The goals and policies of the Subregional Plan are intended to be more specific than those of the County General Plan as they consider the distinct history, character, and identity of Mountain Empire communities.

The following goal in the Mountain Empire Subregional Plan relates specifically to public services and the Proposed Project.

- **Public Facilities and Services – Policy 4.** Uses proposed for property adjacent to substations or transmission line rights-of-way should be reviewed for possible impacts to the power facilities and vice versa.

3.1.6.3 Analysis of Project Effects and Determination as to Significance

Guidelines for the Determination of Significance

The County's Guidelines for Determining Significance do not include a section on Public Services. Therefore, for the purpose of this EIR, Appendix G of the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000 et seq.) applies to the direct and indirect impact analysis, as well as the cumulative impact analysis. A significant impact would result if:

- The project results in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
    - Fire Protection
    - Police Protection
    - Schools
    - Other Public Facilities

3.1.6.3.1 Fire and Emergency Medical Facilities

Analysis

A direct increase in demand for fire protection and emergency medical services would occur at the Proposed Project site during construction and decommissioning when there is increased activity, there are higher amounts of fuel on the site, and there are a greater number of ignition sources on the site, including humans. Similarly, an increase in the risk of wildland fire would occur during decommissioning, when there is increased activity and additional ignition sources on the site. Potential ignition sources during construction-related activities include chain saws, wood chippers, grinders, torches, earth-moving equipment, and other vehicles that could create sparks, be a source of heat, or leak flammable materials, that would increase the possibility of fire. Further information regarding the fire risks and emergency services responses is provided in section 2.4 Hazards and Hazardous Materials of this EIR.

No new or physically altered fire facilities would need to be constructed that might result in physical environmental impacts, as a result of the Proposed Project. Therefore, the Project would not result in impacts related to the need for expanded or additional facilities; impacts would be **less than significant**. Emergency medical response is supplemented by fire protection because the first responders to emergency medical responses are sometimes fire response units. No new or physically altered emergency medical facilities would need to be constructed that might result in physical environmental impacts. Levels of resources such as trained paramedics and paramedic equipment may need to be increased. As discussed in Section 2.4, Hazards and Hazardous Materials, with implementation of M-HZ-2, the Proposed Project will contribute funds to the local fire and emergency response capabilities. The Proposed Project would participate in the SDRFPD's CFD or a similar developer agreement, paying fair share funding toward fire services. Funding provided by the Project would result in capital that would be used toward firefighting and emergency response augments for personnel and equipment so that the SDRFPD/SDCFA and area firefighting agencies can respond with adequate firefighting equipment and medical response units to reach the Project site within acceptable response times as further described in section 2.4 Hazards and Hazardous Materials.

3.1.6.3.2 Police Protection

Analysis

Police protection services at the Project site would primarily be provided by the San Diego County Sheriff's Department office located approximately 15 miles north, at 39919 Highway 94 in Boulevard. This office, which is a satellite office to the Pine Valley Substation, serves an area over 200 square miles and a population of more than 2,000 (San Diego County Sheriff's Office 2012b). The Department is currently meeting response time goals (Cook 2013).

As discussed in Chapter 1, during construction and decommissioning of the Proposed Project, all staging and laydown areas would be fenced. Once the facility is operational, the entire site would be fenced and secured per National Electrical Safety Code standards. Signage in Spanish and English for electrical safety would be placed along the perimeter of the site, warning the public of the high voltage and the need to keep out. Signage would also be placed within the solar facility site where appropriate. With these security measures in place, the Proposed Project is not anticipated to pose a substantial threat of danger to the local population and is not expected to generate a significant number of police response calls. Therefore, construction, operation, and decommissioning of the Proposed Project is not anticipated to generate a need for new or expanded police services or facilities.

During construction of the Proposed Project, the local population would increase, only temporarily by an average of approximately 120 workers daily and up to a maximum of approximately 140 workers on any given day at peak construction activities. There would be no workers on site during operation. This temporary increase of workers in the area is not expected to substantially increase the number of police protection service calls such that new or expanded police facilities or staff would be required to maintain acceptable service ratios and response times because the Department is currently meeting its response time goals and serving a population of over 2,000 permanent residents.

Overall, the Proposed Project site would not result in the need for additional police protective services or facilities, and therefore, would not cause impacts as a result of the need for expanded government facilities. No new police facilities would need to be constructed that might result in physical environmental impacts, as a result of the Proposed Project. Impacts are therefore considered **less than significant**.

3.1.6.3.3 Schools

Analysis

The demand for new or expanded school facilities and services is determined by permanent increases to the local population. As this facility will be unmanned it would not directly cause in an increase in population that would require new or expanded schools. Workers would only be required during construction and decommissioning activities. Due to the temporary nature of construction and decommissioning, workers are not anticipated to temporarily relocate their families to the area and enroll their children in area schools. No new school facilities would need to be constructed that might result in physical environmental impacts, as a result of the Proposed Project. Impacts resulting from new school facilities or expansions of existing school facilities are considered **less than significant**.

3.1.6.3.4 Other Public Services

Analysis

Other public services include hospital and library services. During construction and decommissioning, the daily local population would temporarily increase by an average of approximately 120 workers daily and up to a maximum of approximately 140 workers on any given day at peak construction activities. There will be no increase in population due to operations. The temporary workers needed during construction and decommissioning activities are not expected to relocate their families to the area. The increase in workers to the area is not substantial and is not expected to cause an indirect increase in demand for other public services or facilities. No new public service facilities would need to be constructed that might result in physical environmental impacts, as a result of the Proposed Project. Therefore, impacts as a result of new or expanded other public services or facilities would be **less than significant.**

3.1.6.4 Cumulative Impact Analysis

The geographic extent for the analysis of cumulative impacts associated with public services consists of each public services provider's service area within southeastern San Diego County. For fire and emergency medical response, the cumulative study area would be limited to the service areas for Jacumba Fire Station and AMR. For police protection, the cumulative study area would be limited to the Boulevard Sheriff Station's service area. Generally speaking, the cumulative study area for public services encompasses southeastern San Diego County. Cumulative impact analysis for public services was conducted using the projects in Table 1-7, Cumulative Scenario – Reasonably Foreseeable Approved and Pending Projects (Chapter 1).

Past development and population growth within southeastern San Diego has impacted the provision of public services and facilities. As the area becomes increasingly developed and the permanent population grows, increased demand is placed on the existing public service system, which can become overwhelmed. As discussed above, southeastern San Diego consists of several small, rural communities spread out over a wide geographic area that are generally served by local volunteer and state fire departments and County law enforcement agencies.

3.1.6.4.1 Fire and Emergency Medical Facilities

The list of cumulative projects includes several other renewable energy projects and transmission projects, as well as some smaller residential development, which would contribute to incremental but small increases in population growth in the area similar to the Proposed Project. These projects would contribute to an increased need for fire protection services in the area due to the increase of human activity, ignition sources (such as electrical equipment or transmission lines), and combustible fuel in the area. As discussed in section 2.4 Hazards and Hazardous Materials,

these impacts are mitigated to below the level of significance without the need to construct new or expanded facilities.

Therefore, the Proposed Project's indirect impacts would not result in the need for new or expanded fire or emergency medical facilities during construction, decommissioning, and operation and impacts **would not be cumulatively considerable**.

3.1.6.4.2 Police Protection

As discussed above, the list of cumulative projects includes several other renewable energy projects and transmission projects, as well as some smaller residential development, that would contribute to incremental increases in population growth in the area, similar to the Proposed Project. However, the cumulative projects would result in minimal demand for police protection services in the area, similar to that of the Proposed Project, and would not be considered cumulatively significant. The cumulative projects, including the other renewable energy and transmission projects, would not contribute substantially to cumulative impacts to police protection services, as these projects, similar to the Proposed Project, do not include permanent or temporary housing components that would cause direct permanent or temporary increases in population.

Construction and decommissioning (where applicable) of the cumulative projects would be temporary. Of the employees required during construction and decommissioning of the Proposed Project, few are expected to temporarily relocate to the area with their families. The temporary increase in population resulting from construction and decommissioning of the Proposed Project is not expected to substantially increase police service calls, or require the construction of new or expanded facilities in order to maintain acceptable service ratios and response times. Construction of cumulative projects such as the Tule Wind project, East County Substation project, and Energia Sierra Juarez U.S. Transmission Line project, may overlap with the Proposed Project during certain phases. However, demands placed on local police services would be short term and intermittent and would not require the construction and/or expansion of facilities.

Once operational, the Proposed Project would be unmanned and require no permanent on-site employees who would reside in the surrounding area. Though cumulative impacts resulting from the need for expanded police protection services and facilities due to the combined increase in population in the area from the cumulative projects is considered potentially significant, the Proposed Project's contribution **would not be cumulatively considerable**.

3.1.6.4.3 Schools

As discussed above, the Proposed Project would not include a residential component or directly result in an increase in school-age children in the area, and therefore would not directly impact schools. Construction schedules of cumulative projects, such as the Tule Wind project, East

County Substation project, and Energia Sierra Juarez U.S. Transmission Line project, may overlap with the Proposed Project during certain phases. However, temporary construction workers are not expected to relocate to the area with their families; therefore, the Project is not expected to cause substantial increases in demand for schools in the area. The Star Ranch project is the only residential project listed in Table 1-7 and, therefore, is the only cumulative project that would likely result in the introduction of new students to the area.

Once operational, the Proposed Project would be unmanned and require no permanent on-site employees who would reside in the surrounding area. Therefore, the Proposed Project's indirect impacts would not result in the need for new or expanded school facilities during construction, decommissioning, and operation and impacts **would not be cumulatively considerable.**

3.1.6.4.4 Other Public Services

During construction, decommissioning, and operation of the Proposed Project, the local population would increase temporarily by approximately 120 workers at any one time during construction. The potential temporary increase in population in the area would be served by the nearest healthcare centers, hospitals, and libraries as described in Section 3.1.6.1.2. The closest hospital, Sharp Grossmont Hospital, is located in the City of La Mesa, where it currently services a large suburban population. The additional population in the hospital's service area from the Proposed Project and other cumulative projects is not expected to overwhelm the hospital such that expanded services or facilities would be necessary.

Impacts to library services are considered when a project adds permanent residential population to an area. Library services in the area would not be directly impacted by the Proposed Project, since the Proposed Project would not add any permanent residents.

Therefore, for the reasons stated above, the Proposed Project's impacts relating to the expansion of or addition of new other public services **would not be cumulatively considerable**.

3.1.6.5 Conclusion

Fire and Emergency Medical Facilities

Although the local population would temporarily increase by an average of approximately 120 workers daily and up to a maximum of approximately 140 workers on any given day at peak construction activities, this increase is not expected to substantially increase the number of fire or emergency response service calls or that would require new or expanded fire and emergency medical facilities. The Project site would be unmanned during operation. Therefore, impacts are **less than significant**.

Police Protection

Although the local population would temporarily increase by an average of approximately 120 workers daily and up to a maximum of approximately 140 workers on any given day at peak construction activities, this increase is not expected to substantially increase the number of police protection service calls or that would require new or expanded police facilities. The Project site would be unmanned during operation. Therefore, impacts are **less than significant**.

Schools

As the solar facility would be unmanned it would not directly cause an increase in population that would require new or expanded schools. Impacts resulting from new school facilities or expansions of existing school facilities are considered less than significant.

Other Public Services

The increase in workers to the area is not substantial and is not expected to cause an indirect increase in demand for other public services including hospital and library services. Therefore, impacts as a result of new or expanded other public services or facilities would be **less than significant.**

Table 3.1.6-1
Primary Study Area Fire Resources

Station	Location	Staffing	Apparatus
CAL FIRE Whitestar Fire Station	1684 Tierra del Sol Road, Boulevard	Captain, two firefighters (three during fire season), one battalion chief, one hand crew	One Type III engine; one dozer
SDRFPD Jacumba Fire Station	255 Jacumba Street, Jacumba	Two stipend firefighters (varies with CAL FIRE career and SDCFA reserve fire fighters)	Engines: one Type III, one Type I; one 1,500-gallon water tender
SDRFPD Lake Morena Fire Station	29690 Oak Drive, Campo	Captain, two firefighters, one reserve	Paramedic Assessment Engine (Type I)
Campo Indian Reservation	36210 Church Road, Campo	Varies	Engines: one Type I, one Type III; one aerial ladder truck
CAL FIRE McCain Valley Prison Camp	2550 McCain Valley Road, Boulevard	30 firefighters from the camp, typically used for wildland fires, flood control, and community projects	Two Emergency Crew Transport Vehicles
CAL FIRE Campo[a]	31577 Highway 94, Campo	Two to six firefighters depending on the season	Two engines and one pickup truck
SDCFA Boulevard Fire Station	39919 Highway 94, Boulevard	Three full-time firefighters (CAL FIRE) and volunteers (varies); staff varies with a combination of CAL FIRE career fire fighters and SDCFA reserve fire fighters	Engines: one Type I, one Type III, one Type VI; one water tender

Table 3.1.6-1
Primary Study Area Fire Resources

Station	Location	Staffing	Apparatus
SDCFA CampoFire Station[b]	437 Jeb Stuart Road, Campo	Twenty-two volunteer fire fighters	One Type I engine, one patrol, one squad car, one water tender
USFS	Cameron, Glencliff , or Cottonwood	Four firefighters per company in season	Two Type III engines
BLM	No local fire resources	N/A	N/A

Source: Dudek 2013

[a] Johnson, pers. comm. 2013

[b] Shoemaker, pers. comm. 2013.

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