

### 3.1.6 Public Services

This section discusses potential impacts to public services, including fire protection, police protection, schools, parks, and other public facilities, resulting from implementation of the JVR Energy Park Project (Proposed Project). The analysis is based on the review of existing resources, technical data, and applicable laws, regulations, and guidelines.

Comments received in response to the Notice of Preparation (NOP) included concerns regarding availability of fire services and support for increased fire services. 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 A of this EIR.

#### 3.1.6.1 Existing Conditions

The 1,356-acre Project site is located within the Mountain Empire Subregion of southeastern San Diego County. A portion of the Project site was historically used for dairy and agricultural operations. The unincorporated community of Jacumba Hot Springs is located adjacent to the southwestern boundary of the Project site. The Jacumba Airport is located adjacent to the southeastern portion of the Project site. The Sunrise Powerlink and Southwest Powerlink, each of which consists of a 500-kilovolt electric transmission line supported by 150-foot-tall steel lattice structures, transect the Project site. The Project site includes right-of-way easements for Old Highway 80, San Diego Gas & Electric (SDG&E) easements, and an easement for the San Diego and Arizona Eastern Railway. Primary access to the Project site is currently provided via an access road from Old Highway 80, with additional access off of Carrizo Gorge Road.

Baseline public services information was obtained through direct communication with local service providers, as well as several websites, as cited below.

#### Regional Overview

##### Fire Protection

Within the unincorporated region's emergency services system, fire and emergency medical services are provided by fire protection districts, County service areas and CAL FIRE. Collectively, there are 2,800 firefighters responsible for protecting the San Diego region from fire. Generally, each agency is responsible for structural fire protection and wildland fire protection within its area of responsibility. However, mutual and automatic aid agreements enable non-lead fire agencies to respond to fire and emergency service incidents outside their district boundaries. Interdependencies that exist among the region's fire protection agencies are primarily voluntary, since no local governmental agency can exert authority over another. The unincorporated area of San Diego County has a Cooperative Fire Protection Agreement with CAL FIRE for the provision of fire and emergency services in East San Diego County.

Primary emergency response for the Project site would initially be provided by the San Diego County Fire Authority (SDCFA) and/or CAL FIRE from the County's Fire Station 43 in Jacumba Hot Springs. The fire station is located at 1255 Jacumba Street and is staffed with two CAL FIRE firefighters (one firefighter and one company officer) on a Type 1 fire engine under a Cooperative Fire Protection Agreement with CAL FIRE. Fire Station 43 is approximately 3.6 miles from the most remote areas of the Project site with a calculated travel time of approximately 6.8 minutes.<sup>1</sup> In addition to this responding fire station, the County and/or CAL FIRE co-located Station 47 would respond with additional resources if needed. Station 47 is staffed with three CAL FIRE firefighters (two firefighters and one company officer) on a Type 2 fire engine that is designed to deal with wildland fire suppression. Station 47 also has one Mercy Ambulance manned by one or two paramedics. Station 47 is located at 40080 Ribbonwood Road in the unincorporated community of Boulevard, which is approximately 7.8 miles from the Project site. The Boulevard Station is approximately 10.6 miles to the most remote portion of the JVR Energy Park site, with a calculated travel time of approximately 18.7 minutes (White, pers. comm. 2019).

### Law Enforcement

The San Diego County Sheriff's Department provides Law enforcement services for the Project site. Other law enforcement services include California Highway Patrol (CHP) and U.S. Customs and Border Protection (CBP).

The San Diego County Sheriff's 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 Sheriff's 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 2019a). The nearest sheriff's office to the Project site is located at 39919 Highway 94 in Boulevard, approximately 8 miles from the Project site. 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 2019b). Five sheriff's deputies work out of the Boulevard Sheriff's Office, each having their own patrol car. However, there is currently one deputy vacancy. On any given day, two deputies will be on at any given time and they patrol for 12-hour daily shifts. Once the fifth vacant deputy spot is filled, there will be two to three deputies on at a given time. Deputies are required to live in the area, and when their shift is over, they remain on call until the next day's shift begins (Perrapato, pers.

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<sup>1</sup> Travel distances were derived from Google Earth road data and driving on the access roads to fire stations from Project site, while travel times were calculated applying the nationally recognized Insurance Services Office Public Protection Classification Program's Response Time Standard formula ( $T = 0.65 + 1.7 D$ , where  $T$  = time and  $D$  = distance). The ISO response travel time formula discounts speed for intersections, vehicle deceleration and acceleration, and does not include turnout time.

comm. 2019). The Sheriff's Department is currently meeting response time goals for rural areas at the Boulevard Sheriff's Office (Uelen, pers. comm. 2019). The next closest sheriff's office substation to the Project site is the Campo Substation located at 378 Sheridan Road in Campo, approximately 18 miles from the Project site (San Diego County Sheriff's Office 2019b).

CHP separates the state into eight patrol divisions or areas, and its jurisdiction is over state highways, the closest of which are I-8 and Old Highway 80 adjacent to the Project site. CHP can also act as state police. The Project site is located within the CHP's Border Division, which is headquartered in the Kearney Mesa community of San Diego and maintains 12 area offices. The closest CHP offices to the Project site are located in the cities of El Cajon and El Centro (CHP 2019), approximately 50 and 37 miles away, respectively.

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 2463 Ribbonwood Road in the unincorporated community of Boulevard (CBP 2014a) approximately 8.4 miles away from the Project site. 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 417.8 square miles and two traffic checkpoints (CBP 2014b). 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 (Cismeos, pers. comm. 2019). Therefore, the Project site is located in the patrol area of the Boulevard CBP Station.

### Schools

Public schools and educational facilities are mandated by the California 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 Project area. The Mountain Empire Unified School District includes four elementary schools, two middle schools, one senior high school, and one alternative education school. Elementary schools include Campo Elementary, Clover Flat Elementary, Descanso Elementary, and Potrero Elementary. Middle schools include Camp Lockett Middle and Pine Valley Middle. Mountain Empire High School and Alternative Education are also within the Mountain Empire School District (Mountain Empire Unified School District 2019).

### Other Public Services

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 approximately 0.25 miles from the Project site. Nearby branches of the San Diego County Library system include the Campo–Morena Village branch (located at 31466 Highway 94

in Campo, approximately 17 miles west of the Project site) and the Potrero branch (located at 24883 Potrero Valley Road in Potrero, approximately 25 miles west of the Project site) (County of San Diego 2007).

### **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.

#### 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 County General Plan, in particular the Land Use and Safety Elements, outlines policies that address public services in the County. Policies relevant to public services are listed below (County of San Diego 2011a, 2011b). For additional information on County General Plan consistency, see Section 3.1.4, Land Use and Planning.

##### *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.
- **Policy LU-12.3 Infrastructure and Services Compatibility.** Provide public facilities and services that are sensitive to the environment with characteristics of the unincorporated communities. Encourage the co-location of infrastructure facilities, where appropriate.

##### *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) (10 minutes in the rural village boundaries).
- **Policy S-6.5 Concurrency of Fire Protection Services.** Ensure that fire protection staffing, facilities and equipment required to serve development are operating prior to, or in conjunction with, the development. Allow incremental growth to occur until a new facility can be supported by development.
- **Policy S-12.1 New Law Enforcement Facilities.** Coordinate new law enforcement facilities and services with new development in ways that sustain the provision of comprehensive services at levels consistent with substantially similar areas of the County.
- **Policy S-13.1 Sheriff Facility Locations.** Locate Sheriff facilities to best serve existing and planned development and the corresponding demand for services.
- **Policy S-14.1 Vehicular Access to Development.** Require development to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel, whenever feasible.

### 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 Jacumba, Tecate, Potrero, Boulevard, and Campo/Lake Morena, 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 (County of San Diego 2016):

- **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 Proposed Project Effects and Determination as to Significance***

The Proposed Project is a solar energy facility, which includes a switchyard that would be transferred to SDG&E after construction. For the purposes of this analysis, the switchyard (as described in Section 1.2.1 in Chapter 1, Project Description) is a component of the Proposed Project and has been analyzed as a part of the whole of the action. However, this EIR highlights the specific analysis of the switchyard operation under each threshold of significance in the event responsible agencies have California Environmental Quality Act (CEQA) obligations related to the switchyard.

#### **Guidelines for the Determination of Significance**

The County's Guidelines for Determining Significance do not include guidance on public services. Therefore, for the purpose of this EIR, Appendix G of the 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 Protection**

#### Analysis

##### Travel Time from the Closest Fire Station

The County General Plan requires that new development demonstrate that fire protection services can be provided that meet the minimum travel times in Table S-1 in the Safety Element of the General Plan (County of San Diego 2011b). The travel time standards are based on the General Plan Regional Category and/or Land Use Designation. The Regional Category for the Project site is Rural Village. Per the County General Plan Table S-1, the travel time standard for the closest fire station to development within a Rural Village boundary is 10 minutes.

The proposed development would only be in areas that are subject to the 10-minute travel time standard. This travel time provides for a moderate level of service in areas of lower-density development and longer access routes. The travel time from the County Fire Station 43 in Jacumba from the furthest location in the development footprint is calculated at 6.8 minutes; therefore, the Proposed Project would comply with the General Plan for travel time from the closest fire station. In addition, the Proposed Project would also have additional emergency response from the Boulevard Fire Station with a travel time of approximately 18.7 minutes to the proposed development. Therefore, the Proposed Project would meet the minimum travel times in Table S-1 in the Safety Element of the County General Plan.

##### Fire Protection Services during Construction and Decommissioning of the Proposed Project

The number of workers on-site would be substantially higher during the construction and decommissioning phases of the Proposed Project as compared to operations. During construction activities, the Proposed Project would employ a total of 500 workers, with a daily maximum of 500 workers at the peak of construction. These workers could temporarily increase the number of fire and medical calls to facilities; however, the workers employed for construction are not anticipated to relocate permanently to the area with their families and are not expected to induce substantial population growth in the Mountain Empire and Jacumba area. It is anticipated that workers from San Diego to the west or Imperial Valley to the east would construct the Proposed Project, and that those workers would return to these communities after construction activities have concluded. Any increase in fire and emergency medical calls during construction would be temporary.

During decommissioning, the Proposed Project would also increase the on-site population by approximately 250 workers per day. Similar to construction activities, the decommissioning workers would be temporary, as they are not anticipated to relocate permanently to the Mountain Empire and Jacumba area.

Direct increase in demand for fire protection and emergency services could occur at the Project site during construction and decommissioning when there is increased activity on site, ignition sources on site associated with construction, and humans and human activities.

The Proposed Project's anticipated increase in demand for fire protection services is not expected to require the provision of new or physically altered governmental facilities. Any increase in equipment or personnel required to service the Proposed Project could be accommodated within the current capacity of fire service facilities in the Project area. Accordingly, during construction and decommissioning, the Proposed Project would have **no impacts** related to the provision of 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 fire protection and emergency services.

#### Fire Protection Services During Operation of the Proposed Project

During operation and maintenance, the solar energy generation and energy storage facility would not be staffed on site. However, as a conservative comparison, it is anticipated that up to five workers may be on site on occasion during daylight hours for operation and maintenance purposes as needed. Therefore, the 24-hour equivalency would be half that number since staff would not be on site after dark/overnight except for solar panel cleaning, which may occur up to four times per year. Using San Diego County fire agencies' estimate of 82 annual calls per 1,000 population, the Proposed Project's estimated 2.5 on-site personnel would generate up to 0.2 calls per year (1 call every 5 years).

The Proposed Project would result in a potential increase in demand for fire protection services during operations due to the introduction of new electrical equipment on the Project site. The developer would be required to participate in a Fire Service and Mitigation Agreement with SDCFA to increase funding for SDCFA equipment and personnel.

The increase in demand for fire protection services as a result of the Proposed Project is not expected to require the provision of new or physically altered governmental facilities. Any increase in equipment or personnel required to service the Proposed Project could be accommodated within the current capacity of fire service facilities in the Project area. Accordingly, during operation, the Proposed Project would have **no impact** related to the provision of 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 fire protection and emergency services.

In sum, the Proposed Project's construction, operation, and decommissioning would have **no impact** because the Proposed Project would not require the provision of 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 fire protection and emergency services.

### *Switchyard*

The number of workers on the switchyard site would be substantially higher during the construction phase than during its operation. During construction activities, the switchyard would employ approximately 41 workers (out of the 500 total workers) on the construction site. A direct increase in demand for fire protection services could occur at the switchyard site during construction when there is increased activity on site, and a greater number of ignition sources. However, any such increase in demand for fire protection and emergency services as a result of the switchyard's construction would be minimal.

Once operational, the switchyard would be an unstaffed facility, except in cases of periodic maintenance and repair activities. Monitoring and control functions would be performed remotely from SDG&E's central operations facilities. Assuming a maximum of up to four people would be on site during daylight hours on occasion for operation and maintenance purposes, the 24-hour equivalency would be half that number since staff would not be on site after dark/overnight. Using San Diego County fire agencies' estimate of 82 annual calls per 1,000 population, the proposed switchyard is estimated to have two daylight-only on-site personnel would generate up less than 0.2 calls per year (1 call every 5 years).

The presence of minimal employee activity and additional electrical equipment on the switchyard site could result in the need for additional fire protection services. However, any such increase in demand for fire protection and emergency services as a result of the operation of the switchyard would be minimal. In sum, the switchyard would have **no impact** because the switchyard would not require the provision of 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 fire protection and emergency services.

#### **3.1.6.3.2 Police Protection**

### Analysis

Law enforcement services at the Project site would primarily be provided by the San Diego County Sheriff's Department office located approximately 6.7 miles northwest, 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 Department 2019b). The Sheriff's Department is currently meeting response time goals (Uelen, pers. comm. 2019).

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 solar facility 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.

During construction of the Proposed Project, a maximum of approximately 500 workers would be on the Project site on any given day at peak construction activities. The decommissioning phase of the Proposed Project would also temporarily increase the number of workers on site a maximum of approximately 250 workers on any given day at peak decommissioning activities. Construction and decommissioning workers for the Proposed Project are not anticipated to relocate to the area and permanently increase the local population; therefore, the Proposed Project construction and decommissioning would not result in the need for additional law enforcement services or facilities and would not cause impacts as a result of the need for expanded government facilities.

During the operational phase, the Proposed Project does not anticipate any full-time personnel on site, but may include up to five people on site during operations inspections, maintenance, and repair activities. This transitory increase of workers in the area is not expected to substantially increase the number of law enforcement service calls such that new or expanded police facilities or staff would be required to maintain acceptable service ratios and response times. The solar facility would be fenced along the entire facility boundary (see Figure 1-2, Project Components, in Chapter 1, Project Description) for security. The fencing would meet National Electrical Safety Code requirements for protective arrangements in electric supply stations. Fencing would be 7 feet in height total, with a 6-foot-high chain-link perimeter fence and 1 foot of three strands of barbed wire along the top. The fence would be constructed with anti-climbing material(s), such as small-ring chain-link fencing, and some sections would contain slats that would meet electrical safety code requirements. Signage in Spanish and English for electrical safety would be placed along the perimeter of the solar facility, warning the public of the high voltage and the need to keep out. The site would be secured 24 hours per day by remote security services with motion detection cameras. The SCADA system would monitor these cameras remotely, and perimeter and safety lighting would be used only on an as-needed basis for emergencies and protection against security breach. Lighting would be designed to provide security lighting at the entrance off Old Highway 80 and would be on after 5:00 p.m., and motion censored lights would also be installed at all entrances.

The County Sheriff's Department is currently meeting its response time goals and serving a population of over 2,000 permanent residents in the Mountain Empire Subregion (Uelen, pers. comm. 2019); therefore, operation of the Proposed Project would not result in the need for

additional law enforcement services or facilities and would not cause impacts as a result of the need for expanded government facilities.

Therefore, construction, operation, and decommissioning of the Proposed Project would not require the provision of new or physically altered governmental facilities for police services, the construction of which could cause significant environmental impacts. Therefore, **no impacts** would result from new or expanded police services facilities.

### Switchyard

The number of workers on the switchyard site would be substantially higher during the construction phase than during the switchyard's operation. During construction activities, the Switchyard would employ approximately 41 workers (out of the 500 total) on site during the Proposed Project. These workers could temporarily increase the number of calls to law enforcement; however, the workers employed for construction are not anticipated to relocate permanently to the area with their families and are not expected to induce substantial population growth in the Mountain Empire and Jacumba area. It is anticipated that workers from San Diego to the west or Imperial Valley to the east would construct the switchyard, and that those workers would return to these communities after construction activities have concluded.

Once operational, the switchyard would be an unstaffed facility, except in cases of periodic maintenance and repair activities. Monitoring and control functions would be performed remotely from SDG&E's central operations facilities. Routine maintenance and repair activities would necessitate approximately six trips per year by a two- to four-person crew in a maintenance truck. Routine operations would require one or two workers in a light utility truck to visit the switchyard site on a weekly basis. Thus, the switchyard does not propose any full-time personnel on site but may include up to five people on site during operations inspections, maintenance, and repair activities. While unoccupied, the switchyard site would be protected by a 10-foot-tall chain-link security fence topped with barbed wire. Switchyard lighting would be placed near major electrical equipment. The yard lights would normally be turned off and would only be used during nighttime for security and safety reasons. The lights would be mounted near the switchyard gates and building entrances to allow for nighttime emergency repair and routine maintenance access. All entrance gates would be locked and monitored remotely to limit access to only qualified personnel. Warning signs would be posted, in English and Spanish, on the switchyard fence in accordance with federal, state, and local safety regulations. A switchyard ground grid would also be installed in accordance with applicable safety guidelines.

Therefore, construction and operation of the switchyard would not require the provision of new or physically altered governmental facilities, the construction of which could cause significant

environmental impacts. Therefore, **no impacts** would result from new or expanded police services facilities.

### **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. Up to 500 workers would temporarily be on site per day during the construction of the Proposed Project, and up to 250 workers would temporarily be on site during decommissioning; however, due to the short duration of the construction and decommissioning phases—16 and 12 months, respectively—no workers are expected to permanently move to the area.

The Proposed Project, including the switchyard, does not anticipate any full-time personnel on site, but may include up to five people on site during operations, inspections, maintenance, and repair activities. This minimal increase of workers to the site would not directly cause an increase in population that would require new or expanded schools.

Due to the temporary nature of construction and decommissioning, and minimal increase of workers during operations, 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, including the switchyard. Thus, there would be **no impacts** resulting from new school facilities or expansions of existing school facilities.

### **3.1.6.3.4 Other Public Services**

#### Analysis

The Proposed Project does not anticipate any full-time personnel on site, but may include up to five people on site during operations inspections, maintenance, and repair activities. The temporary workers needed during construction and decommissioning activities, and minimal number of workers needed for operations, 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 other public service facilities, such as libraries, would need to be constructed that might result in physical environmental impacts, as a result of the Proposed Project, including the switchyard. Therefore, **no impacts** would result from new or expanded public services or facilities.

#### **3.1.6.4 Cumulative Impact Analysis**

The geographic extent for the analysis of cumulative impacts associated with public services consists of the service area for each public service provider that would serve the Proposed Project. Generally speaking, the cumulative study area for public services encompasses southeastern San Diego County as public services in the area have overlapping jurisdictions and provide services for the Proposed Project and adjacent projects.

The service area for the Boulevard Sheriff's station, which is approximately 200 square miles and includes the communities of Boulevard and Jacumba, determines the boundary for the cumulative analysis regarding law enforcement. This station would be the one to respond to a call from the Project site, in addition to existing or future calls within its service area, which could potentially result in cumulative impacts. Cumulative impact analysis for public services was conducted using the projects in Table 1-4, Cumulative Scenario – Reasonably Foreseeable Approved and Pending Projects, in Chapter 1, Project Description.

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 as 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 Cumulative Fire Protection**

The list of cumulative projects includes several other existing and proposed renewable energy projects in the vicinity, as described below. The cumulative projects also include a proposed campground/conference center expansion (Rough Acres Ranch Foundation Campground Facility), a casino expansion, a ranch expansion, a new well, and a new water tank. 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), and combustible fuel in the area.

As described in Section 3.1.6.3.1, Fire Protection, the Proposed Project would meet the minimum travel times in Table S-1 in the Safety Element of the General Plan, and any increase in demand for fire protection services as a result of the Proposed Project would be addressed through the developer's participation in a Fire Services and Mitigation Agreement with SDCFA. Any increase in equipment or personnel required to service the Proposed Project could be accommodated within the current capacity of fire service facilities in the Project area.

Construction of cumulative projects, such as Boulevard Solar, Boulevard Energy Storage, Cameron Solar, Campo Wind with Boulder Brush Facilities, Torrey Wind, and the Rough Acres

Foundation Campground Facility may overlap with the Proposed Project during certain phases, which could result in a temporary cumulative increase in construction workers in the area that may increase demand for fire protection services associated with fire emergency response calls such that services ratios or response times would be substantially impacted. Projects on the list of cumulative projects would also participate in a Fire Service Agreements with the SDCFA, as required by the County. The Fire Services Agreements for these projects would ensure that each project would provide fair share funding to be used to augment existing fire emergency response capabilities of the SDCFA and would offset cumulative impacts of the projects. The funding would help maintain or enhance fire service ratios and response times in the area. Therefore, the Proposed Project's impacts with respect to fire protection, in addition to other past, present, and future projects **would not be cumulatively considerable**.

#### **3.1.6.4.2 Police Protection**

The list of cumulative projects includes several other existing and proposed renewable energy projects in the vicinity, as described below. These projects would contribute to incremental but small increases in population growth in the area similar to the Proposed Project. However, the cumulative projects would result in minimal demand for law enforcement 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 law enforcement 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 law enforcement service calls, or require the construction of new or expanded facilities in order to maintain acceptable service ratios and response times. The relatively modest number of construction workers and that the facility would be secured throughout construction and operation. Construction of cumulative projects such as the Rough Acres Foundation Campground Facility, Boulevard Solar, Boulevard Energy Storage, Cameron Solar, and Campo Wind with Boulder Brush Facilities and Torrey Wind, may overlap with the Proposed Project during certain phases. However, demands placed on local law enforcement services would be short term and intermittent, and would not require the construction and/or expansion of facilities.

Once operational, the Proposed Project does not anticipate any full-time personnel on site, but may include up to five people on site during operations inspections, maintenance, and repair activities.

As such, this increase in workers on site would be minimal. Therefore, the Proposed Project's impacts to police protection services, in addition to other past, present and future projects **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 proposed cumulative projects, such as the Rough Acres Foundation Campground Facility, Boulevard Solar, Boulevard Energy Storage, Cameron Solar, and Campo Wind with Boulder Brush Facilities and Torrey Wind, 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 Proposed Project is not expected to cause substantial increases in demand for schools in the area. None of the projects on the Cumulative list are residential projects; therefore, similar to the Proposed Project, the cumulative projects would not result in the introduction of new students to the area.

Once operational, the Proposed Project does not propose any full-time personnel on site but may include up to five people on site during operations inspections, maintenance, and repair activities. Thus, the Proposed Project would require no permanent on-site employees who would reside in the surrounding area. Therefore, the Proposed Project's impacts to school facilities, in addition to other past, present, and future projects, **would not be cumulatively considerable**.

#### **3.1.6.4.4 Other Public Services**

The Proposed Project would increase the local population temporarily by approximately 500 workers during the peak construction period. The Proposed Project would also increase the local population temporarily by 250 workers during decommissioning. 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 direct and indirect impacts relating to the expansion of or addition of new other public services, in addition to other past, present, and future projects, **would not be cumulatively considerable**.

### **3.1.6.5 Significance of Impact Prior to Mitigation**

#### **Fire Protection and Emergency Services**

The Proposed Project would meet the County's minimum travel time standards from the closest fire station. Direct increase in demand for fire protection and emergency services could occur at

the Project site during construction, operation, and decommissioning when there is increased activity on site and a greater number of ignition sources on site. The developer would be required to participate in a Fire Protection and Mitigation Agreement with SDCFA to increase funding for SDCFA equipment and personnel. Any increase in equipment or personnel required to service the Proposed Project could be accommodated within the current capacity of fire service facilities in the Project area. Construction, operation, and decommissioning of the Proposed Project would not require the provision of new or physically altered fire service facilities; therefore, **no impacts** would occur.

### Police Protection

Construction, operation, and decommissioning of the Proposed Project would not require the provision of new or physically altered governmental police facilities, the construction of which could cause significant environmental impacts. Thus, there would be **no impacts** resulting from new or expanded police facilities.

### Schools

Due to the temporary nature of construction and decommissioning, and minimal increase of workers during operations, 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. Thus, there would be **no impacts** resulting from new school facilities or expansions of existing school facilities.

### Other Public Services

The Proposed Project does not anticipate any full-time personnel on site but may include up to five people on site during operations inspections, maintenance, and repair activities. The temporary workers needed during construction and decommissioning activities, and minimal number of workers needed for operations, 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 other public service facilities, such as libraries, would need to be constructed that might result in physical environmental impacts, as a result of the Proposed Project. Therefore, **no impacts** would result from new or expanded public services or facilities.

#### **3.1.6.6 Mitigation Measures**

No mitigation measures are necessary.

### **3.1.6.7 Conclusion**

#### Fire Protection

Construction, operation, and decommissioning of the Proposed Project would not require the provision of new or physically altered governmental fire service facilities, the construction of which could cause significant environmental impacts. Thus, there would be **no impacts** resulting from new or expanded fire service facilities

#### Police Protection

Construction, operation, and decommissioning of the Proposed Project would not require the provision of new or physically altered governmental police facilities, the construction of which could cause significant environmental impacts. Thus, there would be **no impacts** resulting from new or expanded police service facilities.

#### Schools

As the solar facility would be not include any full-time personnel on site, it would not directly cause an increase in population that would require new or expanded schools. There would be **no impacts** related to new school facilities or expansions of existing school facilities.

#### 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 and library services. There would be **no impacts** related to new or expanded other public services or facilities.

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