

### 3.1.8 Public Services

This section of the Environmental Impact Report (EIR) discusses potential impacts to public services 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 report prepared for the proposed project in accordance with the *County Guidelines for Determining Significance and Report Format and General Content Requirements – Wildland Fire and Fire Protection* (County of San Diego 2023):

- *Fire Protection Plan, Starlight Solar Project* (SWCA Environmental Consultants 2024) (Appendix L of this EIR)

Comments received in response to the Notice of Preparation (NOP) include concerns regarding the impacts of waste generation by construction workers and the availability of emergency responders. These concerns are addressed in this section of the EIR where applicable and within Appendix L. Copies of the NOP and comment letters received in response to the NOP are included in Appendix A, NOP, Initial Study, and Public Comments, of this EIR.

This section addresses fire protection, police services, schools, libraries, and medical facilities. An assessment of parks and recreation facilities is provided in Section 3.2, Effects Found Not Significant as Part of the Initial Study.

#### 3.1.8.1 Existing Conditions

The project site consists of approximately 588 acres in unincorporated San Diego County, south of the community of Boulevard and approximately 0.93 mile north of the U.S.–Mexico border. The community of Boulevard is approximately 65 square miles and includes the communities of Manzanita, Tierra del Sol, and Live Oak Springs. Boulevard is a census-designated place with a population of approximately 410 people (U.S. Census Bureau 2023).

##### Fire Protection

The project site is in southeastern San Diego County, a rural area with few residents that is also within an area statutorily designated as a High Fire Hazard Severity Zone (FHSZ) in a State Responsibility Area (SRA) by California Department of Forestry and Fire Protection (CAL FIRE) (CAL FIRE 2025a). SRAs are recognized by the California Board of Forestry and Fire Protection as areas where CAL FIRE is the primary emergency response agency responsible for fire suppression and prevention (CAL FIRE 2025b).

There are several fire stations within the project area, including CAL FIRE, San Diego County Fire Protection District (SDCFPD), and U.S. Forest Service fire stations. The Boulevard area is serviced by CAL FIRE’s Boulevard Fire Station (Station 47), located approximately 1.2 miles north of the project site at 40080 Ribbonwood Road in the community of Boulevard. Fire emergencies that may occur at the project site would be primarily responded to by CAL FIRE Station 47, which is staffed by both volunteer reserve and career firefighters. Additional response would be available from the SDCFPD’s Jacumba and Lake Moreno Stations (Stations 43 and 42, respectively) and CAL FIRE’s Campo Station (Station 40); helicopter water drops may also be used, as appropriate. Other fire protection would be provided from mutual aid resources from throughout San Diego County and the state, when necessary.

##### Police Services

Police services in the proposed project area are provided 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 provides police and investigative services to unincorporated areas in San Diego County. The closest patrol office to the project site is the Boulevard office, which serves the communities of Boulevard and Jacumba. The Boulevard office is located at 39919 State Route 94 and is approximately 1.05 miles north of the project site. This office is a satellite office of the Pine Valley Sheriff's Substation, serving an area of more than 200 square miles and a population of over 2,000 (San Diego County Sheriff's Department 2025).

The CHP provides traffic law enforcement services throughout the state of California and is divided into eight divisions. The project site falls within the Border Division, which includes the southernmost part of California. The offices closest to the project site are the El Cajon office, located at 1722 East Main Street, approximately 38 miles west of the project site, and the El Centro office, located at 2331 U.S. Route 86 in Imperial, approximately 41 miles east of the project site (San Diego County Sheriff's Department 2025).

Due to the project site's proximity to the U.S.–Mexico border and highly populated communities near the border, the CBP maintains a strong presence in southeastern San Diego County. The closest U.S. Border Patrol station to the project site is the Boulevard Station at 2463 Ribbonwood Road, approximately 1.93 miles north of the project site. The Boulevard Station has an area of responsibility of approximately 10 linear border miles and an area of 500 square miles. This station is responsible for two eastbound tactical checkpoints (CBP 2020).

### Schools

Public schools and educational facilities are administered by the San Diego County Board of Education and San Diego County Office of Education. The Mountain Empire Unified School District serves the project area and includes one early childhood education school, four elementary schools, two middle schools, one senior high school, and one alternative education high school. The closest elementary school is Clover Flat Elementary, 0.86 mile north of the project site, which had a total of 183 students in the 2020 to 2021 school year (EdData 2025). The closest middle school is Camp Lockett Middle School, 10.6 miles west of the project site, which had a total of 135 students in the 2020 to 2021 school year (EdData 2025). Mountain Empire High School, the only high school in the district, is 12.82 miles northwest of the project site and had a total of 460 students in the 2020 to 2021 school year (EdData 2025).

### 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 medical center is University of California San Diego Health in the city of Chula Vista, approximately 39 miles west of the project site.

The San Diego County Library System has multiple branches in the Mountain Empire Subregion. The Jacumba Branch is the closest branch to the project site, located at 44605 U.S. Route 80 (Old Highway 80) and 5.5 miles east of the project site. There is also a self-service library kiosk at 39923 Ribbonwood Road in Boulevard, approximately 1.3 miles north of the project site.

## **3.1.8.2 Regulatory Setting**

### Federal Regulations

There are no relevant federal regulations for public services.

## State Regulations

### California Health and Safety Code

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code, which includes regulations concerning building standards (as also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State Fire Marshal enforces these regulations and building standards in all state-owned buildings, state-occupied buildings, and state institutions throughout California.

### California Fire Code

The California Fire Code (24 California Code of Regulations Chapter 9) contains regulations consistent with nationally recognized and accepted practices for safeguarding life and property from the hazards of fire and explosion; dangerous conditions arising from the storage, handling, and use of hazardous materials and devices; and hazardous conditions in the use or occupancy of buildings or premises. The California Fire Code also contains provisions to assist emergency response personnel.

## Local Regulations

### San Diego County General Plan

Updated (and adopted) in August 2011, the *San Diego County General Plan: A Plan for Growth, Conservation, and Sustainability* (General Plan) guides future growth in the unincorporated areas of San Diego County and considers projected growth anticipated to occur within various communities (County of San Diego 2011a). The General Plan Land Use and Safety Elements contain policies that address public services in the county.

### *Land Use Element*

The following policies apply to the proposed project (County of San Diego 2011b):

- **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.
- **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*

The following policies apply to the proposed project (County of San Diego 2021):

- **S-4.2 Development in Hillsides and Canyons.** Require development located in wildland areas, near ridgelines, top of slopes, saddles, or other areas where the terrain or topography affects its susceptibility to wildfires to be located and designed to account for topography and reduce the increased risk from fires. Density reduction may be necessary to reduce fire hazards if the location and design of the development cannot reduce the threat effectively.

- **S-4.4 Service Availability.** Plan for development where fire and emergency services are available or planned.
- **S-4.6 Fire Protection Plans.** Ensure that development located within fire hazard areas implement measures in a Fire Protection Plan that reduce the risk of structural and human loss due to wildfire.
- **S-6.2 Fire Service Provider Agreements.** Encourage agreements between fire service providers to improve fire protection and to maximize service levels in a fair, efficient, and cost-effective manner.
- **S-7.3 Fire Protection Services for Development.** Require that new development demonstrate that adequate fire services can be provided that meet the minimum staffing of personnel and that meet the minimum travel times identified in Table S-3 (Travel Time Standards from Closest Fire Station).
- **S-7.4 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.
- **S-14.1 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.
- **S-15.1 Sheriff Facility Locations.** Locate Sheriff facilities to best serve existing and planned development and the corresponding demand for services.
- **S-16.1 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, San Diego County General Plan* (Mountain Empire Subregional Plan) (County of San Diego 2016) establishes goals and policies to guide development within the areas of Jacumba, Tecate, Potrero, Boulevard, and Campo/Lake Morena, which together compose the Mountain Empire Subregion of southeastern San Diego County. The goals and policies of the Mountain Empire 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 policy in the Mountain Empire Subregional Plan, in Chapter 5, Public Facilities and Services, relates specifically to public services and the proposed project (County of San Diego 2016):

- **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.

### Boulevard Subregional Plan

The *Boulevard Subregional Planning Area, Mountain Empire Subregional Plan* (Boulevard Subregional Plan) (County of San Diego 2013) provides specific policy guidance for over 55,000 acres, which includes the communities of Boulevard, Live Oak Springs, and Tierra del Sol. The Boulevard Subregional Plan has been reviewed related to the focus of this section of the EIR.

The following policies in the Boulevard Subregional Plan relate specifically to public services and the proposed project (County of San Diego 2013):

- **Policy LU 5.1.1.** Seek funding and promote efforts to provide the necessary facilities, infrastructure, and equipment to support the Boulevard Fire and Rescue Department.
- **Policy COS 2.1.1** Seek funding opportunities to acquire a site and construct a multi-purpose community center for Boulevard.

### **3.1.8.3      *Analysis of Project Effects and Determination as to Significance***

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

The County does not have guidance for determining significance to public services beyond using the checklist questions in the State California Environmental Quality Act (CEQA) Guidelines, Appendix G. Therefore, for the purposes of this EIR, Appendix G, Issue XV.a of the State CEQA Guidelines is used to assess the project's direct, indirect, and cumulative impacts.

A significant impact would result if the effects exceed the significance criteria described below:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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
  - Parks
  - Other public facilities

As stated previously, an assessment of parks and recreation facilities is provided in Section 3.2, Effects Found Not Significant as Part of the Initial Study. The remaining issue areas are discussed below.

#### **Analysis**

##### **Fire Protection**

During construction, the likelihood of a construction accident or emergency incident that would require fire protection services at the project site may increase. This is due to increased activity at the project site (up to 210 workers per day during the peak construction period), higher amounts of fuel on-site, and a greater number of ignition sources on-site. Throughout the project's construction phase, appropriate fire safety measures would be used to reduce the risk of an emergency, such as clearing and grubbing and installing water tanks. The project would also be required to participate in Fire Service Agreements with the San Diego County Fire Authority (SDCFA), as mandated by the County. This funding would help maintain or improve fire service ratios and response times in the area.

During operation of the project, the site would be mostly unoccupied with the exception of occasional maintenance and inspections. Fire management zones would be maintained around all structures and access roads. The battery energy storage system (BESS) would follow all applicable building and fire codes, including the National Fire Protection Association's (NFPA) new Standard for Installation of Energy Storage Systems (NFPA 855). More information regarding fire hazards can be found in Section 3.1.5, Hazards and Hazardous Materials.

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

The project is located within different land use designations according to the Land Use Map appendix of the General Plan (County of San Diego 2011a). The proposed generation-tie (gen-tie) line and substation are in semi-rural residential land (Semi-Rural Residential [SR-10]) for some of the northern portion of the project; the remaining project footprint is in rural lands (Rural Lands 80 [RL-80]). As stated in County General Plan Safety Element Policy S-7.3, fire protection services must be provided that meet the minimum travel time standards identified in Table S-3 of the Safety Element (County of San Diego 2021), which are based on the Regional Category and/or land use designations. According to Table S-3 of the Safety Element, the project is classified as outlying (SR-10) with a travel time requirement of 20 minutes or less, and as desert/wilderness (RL-80) with a travel time requirement that allows more than 20 minutes. Multiple fire stations—CAL FIRE, SDCFPD, and the Bureau of Indian Affairs Campo Reservation—are within the 20-minute travel time standard for SR-10 and thus also meet the requirement for RL-80. SDCFPD Boulevard Station 47 is 1 mile from the project and within a 5-minute drive time. Coverage of the entire project area from Station 47 includes 83 acres under 5-minute response, 287 acres under 10 minutes, 145 acres under 20 minutes, and the remaining 54 acres outside the 20-minute response time frame. SDCFPD confirmed that SDCFPD fire services in the area would be able to support the project, as noted in Form PDS-399F, appended to the *Fire Protection Plan for the Starlight Solar Project* (see Appendix L). Therefore, the project meets travel time standards as outlined in Table S-3 of the Safety Element.

In addition to SDCFPD, the CAL FIRE White Star Station and the Campo Reservation Fire Protection District Station are both within 10-minute travel times, at 1.6 and 4.3 miles, respectively, and CAL FIRE Jacumba Station 43 is 5 miles from the project, with a travel time of 15 minutes. These stations adequately provide services to the gen-tie line and substation within the 20-minute travel time. Two additional fire stations—CAL FIRE Campo Station 40 and SDCFPD Lake Morena Station 42—are just outside the 15-minute travel time. These stations adequately serve the southern portion of the project with a desert/wilderness designation and a travel time greater than 20 minutes. These stations are staffed for incident response with adequate apparatus and firefighting equipment. Additional SDCFPD, CAL FIRE, and U.S. Forest Service fire stations are in the vicinity beyond the 20-minute travel time and could provide emergency services in case additional firefighting resources are needed, as well as aerial support if needed (see Appendix L).

For these reasons, the project would not result in the need for new or physically altered fire protection facilities. Therefore, there would not be adverse physical impacts associated with the provision of new or physically altered fire facilities and impacts would be **less than significant**.

### **Police Services**

Construction of the project could increase the local population by up to 210 workers per day during the peak construction period of Phase II. Decommissioning of the project would also temporarily increase the number of workers on-site. The majority of construction and operational employees are anticipated to reside locally or regionally, commuting to the project site. Due to the temporary nature of construction and decommissioning, employees are not anticipated to relocate to the area and increase the local population, thus resulting in the need for additional police services. There would be no full-time employees on-site during operation. As previously discussed, there are two law enforcement stations within 2 miles of the project.

The project would be fenced along the entire facility boundary for security. The fencing would meet National Electrical Safety Code requirements for protective arrangements in electric supply stations. Fencing would be up to 7 feet in total height, with a 6-foot-high chain-link perimeter fence and 1 foot of three strands of barbed wire along the top. Signage in Spanish and English for electrical safety would be

placed along the perimeter of the solar facility on the fence, warning the public of the high voltage and the need to keep out. Low-level shielded light-emitting diode (LED) lights would be installed at all site access driveway entrances, inverters, substation, and BESS facilities. These lights would only be used if motion is detected. With these security measures implemented, the project would not be anticipated to pose a substantial danger to the local population nor generate a significant number of police response calls.

For these reasons, the project would not result in the need for additional police protective services or new or physically altered police facilities. Therefore, there would not be adverse physical impacts associated with the provision of new or physically altered police facilities and impacts would be **less than significant**.

### Schools

The project does not include a residential component and would not result in a substantial permanent increase to the local population. Although the project could temporarily increase the local population by up to 210 workers per day during the peak construction period, it is not anticipated that these workers would permanently relocate their families to the area due to the temporary nature of this work. Once construction is complete, the project would not have any full-time personnel on-site, and the occasional operations and maintenance workers are not anticipated to relocate near the project site. For these reasons, the project would not increase the demand for school services in the area. Therefore, impacts resulting from new school facilities or expansions of existing school facilities would be **less than significant**.

### Other Public Services

Construction of the project would temporarily increase the local population by up to 210 workers per day during the peak construction period. It is possible that these workers would visit local healthcare facilities or libraries; however, any increase would be temporary and not result in the need for new or expanded facilities or services. Therefore, the potential for environmental effects related to the provision of other public service facilities would be **less than significant**.

#### **3.1.8.4 Cumulative Impact Analysis**

The cumulative study area for public services generally includes southeastern San Diego County, where overlapping jurisdictions would provide services to the project and the nearby projects in the cumulative scenario. The cumulative impact analysis for public services was performed using the projects listed in Table 1-4 in Chapter 1.0, Project Description, Location, and Environmental Setting.

Southeastern San Diego County comprises several small, rural communities dispersed across a vast geographic region. These communities are typically served by local volunteer and state fire departments as well as County law enforcement agencies. As the area continues to develop and the permanent population increases, the existing public service system faces heightened demand, which can affect the delivery of public services and facilities.

#### **Cumulative, Fire Protection**

The list of cumulative projects includes several existing and proposed wind and solar renewable energy projects, and public facilities improvement projects. These projects could increase the need for fire protection services in the area due to the rise in human activity, combustible materials, and ignition sources.

As previously discussed, the project would comply with the minimum travel times specified in Table S-3 of the Safety Element of the General Plan for fire protection services. The project would also participate in a Fire Service Agreement with the SDCFA, as mandated by the County. As such, any additional equipment

or personnel needed to service the project could be accommodated within the current capacity of fire service facilities in the surrounding area.

The construction phase of the proposed project may overlap with construction of other projects in the area. This overlap could temporarily increase the number of construction workers in the area, thereby raising the demand for fire protection services related to fire emergency response calls, potentially impacting service ratios or response times. However, the projects on the cumulative list would also participate in Fire Service Agreements with the SDCFA. These agreements ensure that each project contributes fair share funding to enhance the existing fire emergency response capabilities of the SDCFA. This funding would help maintain or improve fire service ratios and response times in the area and would address any increase in demand for fire protection services as a result of the cumulative projects.

Furthermore, the project and other and other development in the cumulative study area would not result in substantial permanent increases in population. Therefore, the impacts of the project, in addition to other past, present, and future projects **would not contribute to a cumulatively considerable impact** associated with the provision of new or physically altered fire facilities.

### Cumulative, Police Services

The list of cumulative projects includes several existing and proposed wind and solar renewable energy projects, and public facilities improvement projects. These projects may contribute to temporary population growth in the area, which would minimally increase demand for law enforcement services.

As previously discussed, project construction could temporarily increase the local population by up to 210 workers per day during the peak construction period, and there would be no full-time employees on-site during operation. The majority of construction employees are anticipated to reside locally or regionally, commuting to the project site. Therefore, it is unlikely that any workers would relocate to the area and new or expanded police facilities or staff would not be required to maintain acceptable service ratios and response times. Additionally, the project site would be secured during construction, operation, and decommissioning.

The construction phase of the proposed project may overlap with construction of other projects in the area. However, the cumulative projects, like the proposed project, would not substantially impact law enforcement services, as they do not involve permanent or temporary housing components that would lead to direct increases in population. As such, the demands generated by the cumulative projects for local law enforcement services would be short-term and intermittent and would not require the construction or expansion of facilities.

As such, the project and other and other development in the cumulative study area would not result in substantial permanent increases in population and would not substantially increase demand for law enforcement services. Therefore, the impacts of the project, in addition to other past, present, and future projects **would not contribute to a cumulatively considerable impact** to police protection services.

### Cumulative, Schools

The list of cumulative projects includes several existing and proposed wind and solar renewable energy projects, and public facilities improvement projects. None of these projects include a residential component or would directly result in an increase in school-age children in the area.

As previously discussed, project construction could temporarily increase the local population by up to 210 workers per day during the peak construction period, and there would be no full-time employees on-site during operation. The majority of construction employees are anticipated to reside locally or regionally,

commuting to the project site. Therefore, it is unlikely that any workers would relocate to the area with their families and that the number of school-age children in the area would increase.

The construction phase of the proposed project may overlap with construction of other projects in the area. However, the cumulative projects, like the proposed project, would not directly impact schools or result in an increase in school-age children in the area, and would not require the construction or expansion of facilities.

As such, the project and other development in the cumulative study area would not result in substantial permanent increases in population. Therefore, the impacts of the project, in addition to other past, present, and future projects **would not contribute to a cumulatively considerable impact** to schools.

### Cumulative, Other Public Services

The list of cumulative projects includes several existing and proposed wind and solar renewable energy projects, and public facilities improvement projects. These projects may contribute to temporary population growth in the area, which would minimally increase demand for other public services, including libraries and healthcare facilities, in the area.

As previously discussed, project construction could temporarily increase the local population by up to 210 workers per day during the peak construction period, and there would be no full-time employees on-site during operation. The majority of construction employees are anticipated to reside locally or regionally, commuting to the project site. Therefore, it is unlikely that any workers would relocate to the area with their families and that demand on other public services in the area, including libraries and healthcare facilities, would increase.

The construction phase of the proposed project may overlap with construction of other projects in the area. However, the cumulative projects, like the proposed project, would not substantially impact other public services, as they do not involve permanent or temporary housing components that would lead to direct increases in population. As such, the demands generated by the cumulative projects for other public services would be short-term and intermittent and would not require the construction or expansion of facilities.

As such, the project and other development in the cumulative study area would not result in substantial permanent increases in population. Therefore, the impacts of the project, in addition to other past, present, and future projects, **would not contribute to a cumulatively considerable impact** to other public services, such as libraries and healthcare facilities.

### **3.1.8.5 Conclusion**

#### Fire Protection

The project, within the SDCFPD jurisdiction, has one fire station within a 5-minute drive time, two stations within a 10-minute drive time, and an additional station within a 15-minute drive time, providing adequate firefighting resources in compliance with the Safety Element of the General Plan (County of San Diego 2021). The project would have a completed and approved County of San Diego PDS-399F Form showing requested provisions in a Fire Services Agreement that would ensure adequate fire response time, water supply, and Fuel Modification Zones are part of the project. Impacts would be **less than significant**.

#### Police Services

The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities. Impacts would be **less than significant**.

### Schools

The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities. Impacts would be **less than significant**.

### Other Public Services

The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered local healthcare facilities or libraries. Impacts would be **less than significant**.