2.7 Wildfire

This section of the Environmental Impact Report (EIR) discusses potential impacts related to wildfire resulting from construction, operation and decommissioning of the 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 studies 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 2023a):

- *Fire Protection Plan, Starlight Solar Project* (FPP) (SWCA Environmental Consultants 2024) (Appendix L of this EIR)
- *Draft Fire Services Agreement* (County of San Diego 2025) (Appendix P of this EIR)

This analysis is further supplemented by the following technical studies:

- *Starlight Solar Major Use Permit PDS2022-MUP-22-010 Preliminary Battery Energy Storage System NFPA 551 Fire Risk Assessment and Heat Flux Analysis* (Hiller 2025a) (Appendix O.1 of this EIR)
- *Starlight Solar Major Use Permit PDS2022-MUP-22-010 Preliminary Battery Energy Storage System IEC 60812 Failure Mode and Effects Analysis* (Hiller 2025b) (Appendix O.2 of this EIR)
- *Starlight Solar Major Use Permit PDS2022-MUP-22-010 Preliminary Balance of Plant NFPA 551 Fire Risk Assessment* (Hiller 2025c) (Appendix O.3 of this EIR)
- *Starlight Solar Major Use Permit PDS2022-MUP-22-010 Preliminary Balance of Plant IEC 60812 Failure Mode and Effects Analysis* (Hiller 2025d) (Appendix O.4 of this EIR)
- *Starlight Solar Major Use Permit PDS2022-MUP-22-010 Preliminary Balance of Plant Hazard Mitigation Analysis* (Hiller 2025e) (Appendix O.5 of this EIR)
- *Starlight Solar Major Use Permit PDS2022-MUP-22-010 Preliminary First Responders Guide* (Hiller 2026 ~~Hiller 2025f~~) (Appendix O.6 of this EIR)
- *Battery Energy Storage System Plume Study for Starlight Solar* (Hazard Dynamics 2026) (Appendix O.7 of this EIR)

Comments received in response to the Notice of Preparation (NOP) include concerns regarding the location of the project site in a high fire risk area and the potential wildfire risks posed by the project. These concerns are addressed in this section of the EIR, where applicable, and within the FPP (see 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 Comment, of this EIR.

2.7.1 Existing Conditions

2.7.1.1 Project Site Setting

The project site and surrounding area were historically a privately owned ranch; the land has been used for various activities, such as livestock grazing, manicured living compounds, developed areas, and open land. Beyond the private ranchland there is mixed land ownership, including federal land (Cleveland National Forest managed by the U.S. Forest Service and Campo Reservation managed by the Bureau of Indian Affairs), as well as the state preserve of Jacumba Wilderness.

Vegetation on the project site has been influenced by topography, climate, weather patterns, and past land use. The project site is predominantly flat with some hilly slopes and drainages; elevation ranges from 3,370 feet to 3,700 feet (see Appendix L). The climate is generally dry with limited precipitation throughout the year and warm temperatures. The area surrounding the project site has more diverse topography with drainages and steeply sloping mountainous terrain. Rattlesnake Mountain is a notable topographic feature to the south.

Vegetation on-site is mainly grass and shrub species, with areas of coastal live oak. Fuel loadings vary from moderate to heavy, depending on the species present, past activities conducted on-site, and recent weather patterns. Fire behavior modeling was conducted in February 2024 using the Interagency Fuels Treatment Decision Support System (IFTDSS) (see Appendix L; U.S. Department of the Interior 2024). IFTDSS is a web-based application that models fire behavior under a variety of weather conditions and possible fuels treatments for an area of interest or a landscape. IFTDSS uses the following data parameters: 1-hour, 10-hour, and 100-hour dead fuel moistures; herbaceous and woody live fuel moistures; and wind speed and direction. Fuel size classes (1-hour, 10-hour, and 100-hour) used for dead fuel moisture are based on the fuel size diameter and how long it takes for approximately 67% of the moisture content of the woody fuel to reach equilibrium with the environment. Live fuel moistures range from approximately 50% to 300%, depending on the stage of vegetative development. Approximately 42 acres of the project site are non-burnable (either developed or bare ground). Off-site vegetation surrounding the project site is very similar; there are areas of dense shrub and grass loadings, and considerable non-burnable developed acreage (approximately 707 acres within a 1-mile radius) (see Appendix L).

2.7.1.2 CAL FIRE Fire Hazard Severity Zones

The entire project site is within a California Department of Forestry and Fire Protection (CAL FIRE)–designated High Fire Hazard Severity Zone (FHSZ) due to the type of fuels, weather and wind patterns, topographic conditions, and fire history (CAL FIRE 2024; Figure 2.7-1 and Figure 2.7-2). Fires with grass and shrub as the main fuel types are known for faster rates of spread and are often driven by wind and topography, particularly when they align. Fires with these fuel types can have greater flame lengths and fireline intensities that prevent firefighting resources from directly engaging in suppression when there is heavy fuel loading (see Appendix L). Fire has always been a part of the landscape in the area, as these are fire-prone ecosystems composed primarily of chaparral and grass; fuels will readily burn when conditions are right and there is an ignition source. From 2000 to 2023, there were 33 fires within a 10-mile radius of the project site; the majority were small (<100 acres) (Table 2.7-1; see Figure 2.7-2).

Table 2.7-1. Fires Occurring from 2000 to 2023 within a 10-Mile Radius of the Project Site

Fire Year	Fire Name	Total Area Burned (acres)
2000	Border 6	74.56
2002	Manzanita 2	214.90
2003	Jewell	41.74
2003	Range	28.96
2004	Border 10	88.98
2004	La Posta	27.89
2004	Hi Pass	23.48
2004	Border 7	21.11
2005	Church	50.90
2005	Railroad	40.28

Fire Year	Fire Name	Total Area Burned (acres)
2005	Ribbonwood	35.56
2005	Miller	19.71
2005	Sand	10.63
2006	Unnamed fire	12
2008	Shockey	131.36
2008	Carrizo	46.81
2008	Border 15	20.18
2008	Carrizo	12.41
2011	Border 16	21.73
2012	Shockey	2,555.59
2012	Old 2	995.68
2012	Border 12	121.30
2012	Border 6	61.56
2012	La Posta	10.94
2013	Border	61.56
2013	Morena	1.43
2014	Jacumba	26.66
2017	Eclipse	142.91
2018	Recycle	248.38
2018	Church 2	11.05
2019	Crestwood	31.55
2022	Jewel	29.14
2023	Blackwood	37.40

Source: CAL FIRE 2025

2.7.1.3 Emergency Services and Response

The project site is accessible via Jewel Valley Road and additional emergency access would be provided via Tule Jim Lane. Jewel Valley Road is paved in certain segments and is otherwise a flat, well-maintained dirt road. Tule Jim Lane is also a well-maintained dirt road. Both roads are wide enough to accommodate two-way traffic for emergency vehicles and connect to Old Highway 80 in the community of Boulevard. Each site entrance would feature a manual swing gate and a sign with a lighted directory map and contact information. All entrance gates would feature a Knox Box to allow ease of access for emergency service providers.

The *San Diego County General Plan: A plan for growth, conservation, and sustainability* (General Plan) (County of San Diego 2011a) addresses fire station travel times in its Safety Element (County of San Diego 2021), which provides fire station travel time standards for each land use designation. The majority of the project site is designated as Rural Lands 80 (RL-80), which has a travel time requirement of greater than 20 minutes Element (County of San Diego 2021: Table S-3). The generation-tie line route and San Diego Gas and Electric Company (SDG&E) Boulevard substation are designated as Semi-Rural Residential (SR-10), which has a travel time requirement of 20 minutes.

The project site, within the San Diego County Fire Protection District (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 (Figure 2.7-3 and Figure 2.7-4). SDCFPD Boulevard Station 47 is 1 mile from the project site and within a 5-minute drive time. The CAL FIRE White Star Station and the Campo Reservation Fire Protection District Station are both within 10-minute drive times, at 1.6 and 4.3 miles, respectively, and CAL FIRE Jacumba Station 43 is 5 miles from the project site with a drive time of 15 minutes. Two additional fire stations—CAL FIRE Campo Station 40 and SDCFPD Lake Morena Station 42—are just outside the 15-minute drive time but are within the 20-minute standard for semi-rural settings. These stations are staffed for incident response with adequate apparatus and firefighting equipment. As discussed further in Appendix L, drive times were calculated using the ArcGIS Pro Generate Service Areas tool in the Network Analysis toolbox (Esri 2024).

2.7.2 Regulatory Setting

Many federal, state, and county regulations have been enacted to mitigate impacts from potential wildfires on the environment and the safety of both emergency service responders and the public. The regulations below are relevant to the project and the topics of wildfire and emergency services during development and implementation.

2.7.2.1 Federal Regulations

National Fire Protection Association Standard 855

National Fire Protection Association (NFPA) Standard 855, Standard for the Installation of Stationary Energy Storage Systems, was created to address increased use of new technologies in modern energy storage systems (ESSs) and the fire and life safety hazards associated with them. The NFPA standardizes criteria for fire protection of ESS installations based on the technology used in the ESS, environmental setting, size and separation of ESS installations, and the fire suppression and control systems in place. It also considers ventilation, detection, signage, listings, and emergency operations responding to ESS emergencies (NFPA 2023).

North American Electric Reliability Corporation Standards

In compliance with Section 215 of the Federal Power Act, North American Electric Reliability Corporation (NERC) developed mandatory and enforceable reliability standards such as emergency preparedness and operations; facilities design, connections, and maintenance; personnel performance, training, and qualifications; and protection and control. These standards ensure reliable energy production as well as safe operation and maintenance practices (NERC 2024).

National Fire Plan

The National Fire Plan was developed in 2000 to guide swift and organized response to severe wildland fires and their impacts to communities while ensuring sufficient firefighting capacity. The National Fire Plan addresses firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability. The National Fire Plan provides technical, financial, and resource guidance and support for wildland fire management across the United States (Forests and Rangelands 2024).

Federal Energy Regulatory Commission

The Federal Energy Regulatory Commission (FERC) requires utilities to adopt and maintain minimum clearance standards between vegetation and transmission voltage power lines. These clearances vary

depending on voltage. In most cases, the minimum clearances required in state regulations are greater than the federal requirement. In California, for example, the state has adopted General Order 95 rather than the NERC standards as the electric safety standard for the state. FERC standards are not discussed further.

National Electric Safety Code 2017

The National Electric Safety Code covers basic provisions related to electric supply stations, overhead electric supply and communication lines, and underground electric supply and communication lines. The code also contains work rules for construction, maintenance, and operational activities associated with electric supply and communication lines and equipment. The code, which must be adopted by states on an individual basis, is not applicable in the State of California. As stated previously, the State of California has adopted its own standard (General Order 95) rather than a general national standard. The National Electric Safety Code is not discussed further.

Institute of Electrical and Electronics Engineers Standard 516-2009

The Institute of Electrical and Electronics Engineers is a leading authority in setting standards for the electric power industry. Standard 516-2009, *Guide for Maintenance Methods on Energized Power Lines* (Institute of Electrical and Electronics Engineers 2009), establishes minimum vegetation-to-conductor clearances to maintain electrical integrity of the electrical system.

2.7.2.2 State Regulations

California Assembly Bill 337 and Senate Bill 63

Assembly Bill 337 required the State of California to identify very high FHSZs based on factors such as the type of fuels, weather and wind patterns, and topographic conditions. New structures in these designation areas require specific fire prevention modifications. Senate Bill 63 modified and expanded Assembly Bill 337.

California Building Code Chapter 7A

Chapter 7A of the California Building Code describes the building materials and construction methods required in the exterior design and construction of new buildings located in a CAL FIRE FHSZ.

California Fire Code

California Fire Code Section 503 specifies width, vertical clearance, grade and cross-slope, turnouts, dead-end road lengths, and surface material for fire apparatus roads. Section 503 also describes required marking for fire lane designation and restrictions on gates or other blocked access devices.

Section 508 includes fire protection water supply specifications include the water source(s), minimum water flow and water pressure, and fire hydrant and valve location and signing. If water tanks are used, there are multiple specifications for size, installation, and material in accordance with NFPA 22 standards.

Section 903.2 states that approved automatic sprinkler systems must be installed in all new buildings and meet NFPA 13 standards. Additionally, NFPA 855 has standards specific to the installation of ESSs, which includes fire detection and suppression systems.

Section 1205.5 addresses installation of ground-mounted photovoltaic (PV) arrays. It includes specifications on fire apparatus access roads, a perimeter fire apparatus access road, fuel modification within a designated zone, water supply, and identification of all equipment and structures.

California Public Resources Code

California Public Resources Code Section 4292 requires that a minimum firebreak of 10 feet in all directions from the outer circumference of a pole or tower be established around any pole that supports a switch, transformer, lightning arrester, line junction, or end or corner pole. All vegetation shall be cleared within the firebreak.

California Public Resources Code Section 4293 states that any person that owns, controls, operates, or maintains any electrical transmission or distribution line upon any mountainous land, in forest-covered land, or in grass-covered land and has primary responsibility for the fire protection of such area shall maintain a clearance of a certain distance, depending on line voltage. This section establishes the minimum vegetation clearance distances (between vegetation and energized conductors) required for overhead transmission line construction. Minimum clearances are as follows:

- A minimum radial clearance of 4 feet shall be established for any conductor of a line operating at 2,400 or more volts but less than 72,000 volts.
- A minimum radial clearance of 6 feet shall be established for any conductor of a line operating at 72,000 or more volts but less than 110,000 volts.
- A minimum radial clearance of 10 feet shall be established for any conductor of a line operating at 110,000 or more volts but less than 300,000 volts.
- A minimum radial clearance of 15 feet shall be established for any conductor of a line operating at 300,000 or more volts.

Specific requirements applicable to the construction and operation of the proposed project include those from the following sections in California Public Resources Code, Division 4, Chapter 6:

- Section 4427 – Operation of fire-causing equipment
- Section 4428 – Use of hydrocarbon-powered engines near forest, brush, or grass-covered lands without maintaining firefighting tools
- Section 4431 – Gasoline-powered saws and firefighting tools
- Section 4442 – Measures, requirements, and exemptions for spark arresters

2.7.2.3 Local Regulations

County of San Diego Consolidated Fire Code

The County of San Diego (County) in collaboration with the local fire protection districts, created the first Consolidated Fire Code (CFC) in 2001. The CFC incorporates local fire district fire codes as ratified by the Board of Supervisors into a single document, to promote consistency in fire code interpretation and enforcement for the protection of public health and safety. The 2023 CFC (County of San Diego 2023b) is the most recently adopted version and presents the current fire regulations approved by the Board of Supervisors on April 13, 2023, that apply in the various fire districts. The CFC includes permit requirements for the installation, alteration, or repair of new and existing fire protection systems, and penalties for violations of the code. It provides the minimum requirements for access, water supply and distribution, construction type, fire protection systems, and vegetation management. Additionally, the CFC regulates hazardous materials and provides associated measures to ensure that public health and safety are protected from incidents relating to hazardous substance releases.

San Diego County General Plan

The General Plan (County of San Diego 2011a) guides future growth in the unincorporated areas of San Diego County and considers projected growth anticipated to occur within various communities. The Land Use, Conservation and Open Space, and Safety Elements of the General Plan contain policies that address public services in the county.

New development requires demonstration of adequate fire services; this includes minimum staffing at a facility within an established maximum travel time to the development site. Required travel times are correlated to the different land use designations made by the County.

The following policies of the Land Use Element (County of San Diego 2011b) are applicable to the proposed project:

- **LU-6.10 Protection from Hazards.** Require that development be located and designed to protect property and residents from the risks of natural and man-induced hazards.
- **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.

The following policy of the Conservation and Open Space Element (County of San Diego 2011c) is applicable to the proposed project:

- **COS-14.11 Native Vegetation.** Require development to minimize the vegetation management of native vegetation while ensuring sufficient clearing is provided for fire control.

The following policies of the Safety Element (County of San Diego 2021) are applicable to the proposed project:

- **Policy S-1.7 Community Plan Updates.** A series of criteria for community plan updates that incorporate public safety components.
- **Policy S-2.1 Future Fire Protection Plans.** Future Fire Protection Plans shall evaluate evacuations in accordance with the evacuation standards adopted by the San Diego County Fire Protection District.
- **Policy S-2.2 Evacuation Impediments.** Advise, and where appropriate, require all new developments to help eliminate impediments to evacuation within existing community plan areas, where limited ingress/egress conditions could impede evacuation events.
- **Policy S-2.3 Community Plan Evacuation.** Identify community plan areas that have reduced or limited circulation access and develop an evacuation plan, including an Evacuation Traffic Management Plan and recommended improvements to ensure adequate evacuation capabilities. Community Evacuation Plans should be evaluated and revised to address changes in at-risk areas and populations to ensure effectiveness.
- **Policy S-4.1. Defensible Development.** Require development to be located, designed, and constructed to provide adequate defensibility and minimize the risk of structural loss and life safety resulting from wildland fires**.**
- **Policy 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.

- **Policy S-4.3. Minimize Flammable Vegetation.** Site and design development to minimize the likelihood of a wildfire spreading to structures by minimizing pockets or peninsulas, or islands of flammable vegetation within a development.
- **Policy S-4.4 Service Availability.** Plan for development where fire and emergency services are available or planned.
- **Policy S-4.5. Access Roads.** Require development to provide additional access roads where feasible to provide for safe access of emergency equipment and civilian evacuation concurrently. The width, surface, grade, radius, turnarounds, turnouts, bridge construction, vegetative management and brush clearance around roadways, and lengths of fire apparatus access roads shall meet the requirements of the State and San Diego County Consolidated Fire Codes. All requirements and any deviations will be at the discretion of the Fire Code Official.
- **Policy 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.
- **Policy S-4.7. Fire Resistant Construction.** Require all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes and establish and enforce reasonable and prudent standards that support retrofitting of existing structures in high fire hazard areas.
- **Policy S-6.4 Regional Evacuation Coordination.** Coordinate with State and Federal landowners regarding joint use and access agreements for roadways located on state and federal lands that can be used for evacuation purposes.
- **Policy S-7.1 Water Supply.** Ensure that water supply infrastructure adequately supports existing and future development and provides adequate water flow to combat structural and wildland fires. Water systems shall equal or exceed the California Fire Code, California Code of Regulations, or, where a municipal-type water supply is unavailable, the latest edition of National Fire Protection Association (NFPA) 1142, "Standard on Water Supplies for Suburban and Rural Fire Fighting."
- **Policy S-7.2: 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-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).

County of San Diego Multi-Jurisdictional Hazard Mitigation Plan

The federal Disaster Mitigation Act of 2000 requires all local governments to create a disaster plan to qualify for hazard mitigation funding; wildfires are one such natural disaster. This county-wide plan (County of San Diego 2023c) identifies risks from both natural and human-made disasters and discusses ways to minimize potential damage from them.

San Diego County Operational Area Emergency Operations Plan

The County Board of Supervisors approved the updated San Diego County Emergency Operations Plan in August of 2022 (County of San Diego 2022). The Emergency Operations Plan was developed to assist the

County and all cities in establishing relationships and communication among jurisdictions and agencies. The Emergency Operations Plan identifies implementation procedures for mutual aid and similar support during emergency situations such as wildfire. The Emergency Operations Plan also describes a comprehensive emergency management system that allows a planned response to emergency situations; using the Standardized Emergency Management System and the National Incident Management System, the Emergency Operations Plan is scalable to emergency situations of different complexity levels and sizes.

San Diego County Ordinance 68.401–68.406, Defensible Space for Fire Protection Ordinance

This ordinance addresses the accumulation of weeds, rubbish, and other materials on a private property found to create a fire hazard and be injurious to the health, safety, and general welfare of the public. The ordinance constitutes the presence of such weeds, rubbish, and other materials as a public nuisance, which must be abated in accordance with the provisions of this section. This ordinance is enforced in all County Service Areas and in the unincorporated areas of the County outside of a fire protection district. All fire protection districts have a combustible vegetation abatement program, and many fire protection districts have adopted and enforce the County's ordinance.

San Diego County Ordinance 96.1.005 and 96.1.202, Removal of Fire Hazards

The SCDFPD, in partnership with CAL FIRE, the federal Bureau of Land Management, and the U.S. Forest Service, is responsible for the enforcement of defensible space inspections. Inspectors from CAL FIRE are responsible for the initial inspection of properties to ensure an adequate defensible space has been created around structures. If violations of the program requirements are noted, inspectors provide a list of required corrective measures and provide a reasonable time frame to complete the task. If the violations still exist upon reinspection, the local fire inspector will forward a complaint to the County for further enforcement action.

San Diego County Required Fire Prevention in Project Design Standards

Following the October 2003 wildfires, the County incorporated a number of fire prevention strategies into the discretionary project review process for California Environmental Quality Act (CEQA) projects. One of the more significant changes is the requirement that the majority of discretionary permits (e.g., subdivision and use permits) in wildland-urban interface areas prepare an FPP for review and approval. An FPP is a technical report that considers the topography, geology, combustible vegetation (fuel types), climatic conditions and fire history of the project location. The plan addresses the following in terms of compliance with applicable codes and regulations including but not limited to water supply, primary and secondary access, travel time to the nearest fire station, structure setback from property lines, ignition-resistant building features, fire protection systems and equipment, impacts to existing emergency services, defensible space, and vegetation management.

2.7.3 Analysis of Project Effects and Determination as to Significance

2.7.3.1 Methodology

Guidelines for the Determination of Significance

For the purpose of this EIR, Appendix G of the State CEQA Guidelines (14 California Code of Regulations 15000 et seq.) applies to both the direct impact analysis and the cumulative impact analysis. A significant impact would result if the effects exceed the significance criteria described below:

- Substantially impair an adopted emergency response plan or emergency evacuation plan.
- Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.
- Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.
- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Additionally, the County's *Guidelines for Determining Significance and Report Format and Content Requirements: Wildland Fire and Fire Protection* (County of San Diego 2023a) applies to both the direct impact analysis and the cumulative impact analysis. An affirmative response to, or confirmation of, any one of the following guidelines will generally be considered a significant impact related to wildland fire and fire protection as a result of the project, in the absence of evidence to the contrary:

- The project cannot demonstrate compliance with all applicable fire codes.
- A comprehensive Fire Protection Plan has been accepted and the project is inconsistent with its recommendations.
- The project does not meet the emergency response objectives identified in the Safety Element of the County General Plan or offer feasible alternatives that achieve comparable emergency response objectives.

The County guidelines also require the preparation of an FPP for any project located in a CAL FIRE–designated High or Very High FHSZ. As the project site is in a High FHSZ, an FPP was prepared for the project (see Appendix L) and would be evaluated concurrently with this EIR. The FPP was accepted by the SDCFPD in February 2024; the project would adhere to the recommendations of the FPP and would comply with applicable fire codes. Therefore, the first two County guidelines listed above are not further discussed in this section. Potential impacts related to emergency response are addressed in the following section.

2.7.3.2 Emergency Response/Evacuation Plan

Guidelines for the Determination of Significance

This impact analysis considers the following guideline from the State CEQA Guidelines, Appendix G:

- Substantially impair an adopted emergency response plan or emergency evacuation plan.

In addition, this impact analysis considers the following County guideline:

- The project does not meet the emergency response objectives identified in the Safety Element of the County General Plan or offer feasible alternatives that achieve comparable emergency response objectives.

Analysis

The County Office of Emergency Services and the County Sheriff's Department have planned evacuation procedures based on the adopted General Plan and Emergency Operations Plan. The Emergency Operations Plan identifies implementation procedures for mutual aid and similar support during emergency situations such as wildfire. The Emergency Operations Plan also describes a comprehensive emergency management system that allows a planned response to emergency situations of different complexity levels and sizes. The Office of Emergency Services is responsible for notifying and alerting relevant agencies when a disaster occurs; coordinating the response efforts of all involved agencies; ensuring that resources are available and deployed during disasters; creating plans and procedures for disaster response and recovery; and developing and distributing preparedness materials to the public (County of San Diego 2025).

The project site is within locations designated RL-80 and SR-10 (County of San Diego 2011a). Policy S-7.3 of the Safety Element (County of San Diego 2021) requires that new development demonstrate that fire services can be provided within minimum travel times. The project site is classified as outlying (SR-10) with a travel time standard of 20 minutes and as desert/wilderness (RL-80) with a travel time standard greater than 20 minutes. The project site is within SDCFPD jurisdiction and 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 (Figure 2.7-3 and Figure 2.7-4). 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 (see Appendix L).

SDCFPD Boulevard Station 47 is 1 mile from the project site and within a 5-minute drive time. The CAL FIRE White Star Station and the Campo Reservation Fire Protection District Station are both within 10-minute drive times, at 1.6 and 4.3 miles, respectively, and CAL FIRE Jacumba Station 43 is 5 miles from the project site with a drive time of 15 minutes. Two additional fire stations—CAL FIRE Campo Station 40 and SDCFPD Lake Morena Station 42—are just outside the 15-minute drive time. 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 drive time and could provide emergency services in case additional firefighting resources are needed, as well as aerial support if needed. Therefore, the project meets the adequate firefighting resource requirements of the Safety Element of the General Plan (County of San Diego 2021).

Access to the project site would be provided via Jewel Valley Road. The site entrance would feature a manual swing gate and a sign with a lighted directory map and contact information. Additionally, emergency fire access would be provided via Tule Jim Lane which would feature a 24-foot gate. All entrance gates would feature fire authority–approved strobe light activation and a Knox Box key-operated switch to allow ease of access for emergency service providers. All internal access road surfaces within the project site would meet Class II road specifications, would be composed of decomposed granite (DG), and would be permeable to reduce fugitive dust and erosion in accordance with the County Code of Regulatory Ordinances (County Code) Section 87.428, Dust Control Measures, and San Diego Air Pollution Control District Rule 55, which regulates fugitive dust emissions from any commercial construction or demolition activity capable of generating fugitive dust emissions. All DG roads would be compacted and maintained in good condition.

During construction and decommissioning of the project, there would be personnel on-site and a potential increase in demand for emergency services. However, any increase in the regional population associated with project construction or decommissioning activities is expected to be temporary and minimal. Additionally, as part of **PDF-TR-1** (Traffic Control Plan [TCP]), the Applicant will establish procedures for coordinating with local emergency response agencies to ensure the dissemination of information regarding emergency response vehicle routes affected by construction and decommissioning activities. This would ensure that worker trips would not result in inadequate emergency access during construction or decommissioning. As such, the construction and decommission of the project would not impair the implementation of an adopted emergency response plan or emergency evacuation plan and would not result in a conflict with the Safety Element of the General Plan.

The proposed project would include a battery energy storage system (BESS) to store energy generated by the solar panel installations during operations. Phase I of the project would include a 17.4-megawatt (MW) BESS covering approximately 32,000 square feet, and Phase II would include a 200-MW BESS covering approximately 192,000 square feet. The BESS would consist of individual battery containers in cabinets, which would be double-loaded along a concrete foundation. Each BESS cabinet would have a 5-foot-wide access drive aisle. The entire BESS area would be fenced for security and to restrict access. Additional information regarding the specifications of the proposed BESS is provided in Chapter 1.0, Project Description, Location, and Environmental Setting.

As the installation and operation of the proposed BESS could result in the need for emergency response services in the area in the unlikely event of a battery fire. However, as the proposed project would be unoccupied and controlled remotely, the project would not contribute to congestion on roadways in the event that emergency responders need to access the project site. As such, operation of the project would not impair the implementation of the adopted Emergency Operations Plan and would not result in a conflict with the Safety Element of the General Plan.

Therefore, the project would result in a **less-than-significant impact** related to impairing implementation of an adopted emergency response plan or emergency evacuation plan or conflicts with the Safety Element of the General Plan.

2.7.3.3 Exacerbated Wildfire Risk

Guidelines for the Determination of Significance

This impact analysis considers the following guideline from the State CEQA Guidelines, Appendix G:

- Due to slope, prevailing winds, and other factors, exacerbates wildfire risks, and thereby exposes project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Analysis

The entire project site is within a CAL FIRE–designated High FHSZ. Fire has always been a part of the landscape in the area, as these are fire-prone ecosystems composed primarily of chaparral and grass. Fuels will readily burn when conditions are right and there is an ignition source. However, slope, prevailing winds, and other factors would not have a great influence on these potential sources of ignition. The project site is relatively flat. Prevailing winds in the area are moderate from the west-southwest; during Santa Ana wind events, winds can reach increased speeds and sustained gusts up to 30 or 40 miles per hour. Overall, the topography does not lend itself to increasing expected fire behavior—there is no significant terrain, and Santa Ana wind events are limited to certain times of the year when additional restrictions are put in place. Fires in flat terrain with fine fuels (grass and shrubs) are in large part wind-driven.

The project would increase human activities and the potential for ignitions during construction and decommissioning activities. These ignition sources may include mechanized equipment, vehicles, heavy equipment, and installation of electrical equipment. The project would remain generally unoccupied and would be operated remotely, which would limit the number of daily vehicle trips and also limit the introduction of ignition sources to the project site during operations. However, the project proposes the installation and operation of a BESS, which could increase the potential of a wildfire in the unlikely event of a battery fire during project operations.

The battery storage cabinets would be constructed on concrete pads, with the cabinets bolted to the pads. Each battery storage cabinet would be insulated, air-conditioned, and include fire suppression, with separate enclosures for the electronic controls, inverters, and rectifiers. There would be a built-in heat detection and fire protection system and an aerosol fire extinguishing system. The heat and fire detection system would be linked to an automatic inert gas suppression system within each cabinet. The cabinets would be situated to enable emergency response access but would not be walk-in containers; thus, the battery storage cabinets would be non-habitable structures per the state and local fire codes that would be in place at the time a building permit application is submitted to the County. With limited overhead power lines, the project would minimally affect suppression tactics taken by firefighting resources if a fire should start.

The BESS would be designed in accordance with applicable NFPA safety standards and would be compliant with the NFPA's Standard 855, which addresses the design, construction, installation, commissioning, operation, maintenance, and decommissioning of stationary ESSs. The system would also be designed in accordance with, and would satisfy all requirements of, the CFC and San Diego County Fire Department *Interim Fire Protection Guidelines for BESS Facilities*, as well as meet other applicable state and local requirements.

As the final selection of the lithium iron phosphate-based ESS technology remains in process, several preliminary studies (based upon an assumed technology) that are typically required for the completion of a CFC Section 1207.1.4, Hazard Mitigation Analysis, have been prepared for the proposed project and included in this EIR as the following appendices:

- Appendix O.1 Preliminary Battery Energy Storage System Fire Risk Assessment and Heat Flux Analysis (Hiller 2025a)
- Appendix O.2 Preliminary Battery Energy Storage System Failure Mode and Effects Analysis (Hiller 2025b)
- Appendix O.3 Preliminary Balance of Plant Fire Risk Assessment (Hiller 2025c)
- Appendix O.4 Preliminary Balance of Plant Failure Mode and Effects Analysis (Hiller 2025d)
- Appendix O.5 Preliminary Balance of Plant Hazard Mitigation Analysis (Hiller 2025e)
- Appendix O.6 Preliminary First Responders Guide (Hiller 2026 ~~Hiller 2025f~~)
- Appendix O.7 Battery Energy Storage System Plume Study (Hazard Dynamics 2026)

It should be noted that these preliminary analyses address the BESS, as well as the other components of the solar energy facility (referred to above as the "balance of plant"). These analyses will be finalized and updated when the BESS technology is selected and as part of the Construction Authorization Submittal.

Although the topography of the project site does not lend itself to increasing expected fire behavior, elevated weather conditions could increase the potential for an uncontrolled spread of wildfire during construction and decommissioning activities. Further, despite compliance with applicable standards, installation and operation of the proposed BESS could result in an increased potential of a wildfire in the unlikely event of

a battery fire. Therefore, the project would have a **potentially significant impact** related to exacerbated wildfire risk (**Impact WF-1**).

2.7.3.4 Infrastructure Contribution to Wildfire Risk

Guidelines for the Determination of Significance

This impact analysis considers the following guideline from the State CEQA Guidelines, Appendix G:

- Requires the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

Analysis

The project would construct extensive infrastructure associated with the solar facility, BESS, and substation interconnection. Design and construction of new structures within the project would meet all applicable standards and requirements of the 2023 CFC (County of San Diego 2023b), with special adherence to California Building Code requirements. However, as previously discussed, the project infrastructure would include a BESS, which could exacerbate fire risk in the unlikely event of a battery fire during installation or operations. Therefore, the project would result in a **potentially significant impact** related to the installation or maintenance of infrastructure that would exacerbate fire risk (**Impact WF-2**).

2.7.3.5 Exposure to Post-Fire Risk

Guidelines for the Determination of Significance

This impact analysis considers the following guideline from the State CEQA Guidelines, Appendix G:

- Exposes people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Analysis

The project site is located in the community of Boulevard, which is approximately 65 square miles and as of 2022 had a population of 1,673 (San Diego Association of Governments 2022). Surrounding land uses consist of single-family residences and vacant land.

The project site is predominately flat with some hilly slopes and drainages; steeper slopes and more substantial terrain are present outside the project site. As analyzed in Section 3.1.3, Geologic Hazards, Soils, and Paleontological Resources, the project site is not sited within a landslide-susceptible area. As noted in the *Preliminary Geotechnical Site Evaluation Report* (Bruin Geotechnical Services, Inc. 2022; see Appendix F), the project site is not within an area mapped for landslide hazards and is underlain by crystalline bedrock, which is not typically prone to substantial slope failure in areas that are not steeply sloped. Additionally, the grading plans for the project would comply with standards in the County Code Sections 87.101 through 87.905 (County Grading, Clearing, and Watercourses) addressing the stability, incline, and compaction of cuts and fills. During trenching and excavation, the project would be required to comply with Occupational Safety and Health Administration standards to protect slopes and prevent cave-ins and other hazards related to soil stability, such as landslides and rock falls.

The project would be generally unoccupied and operated remotely, and no habitable structures are proposed by the project. Furthermore, the project would be located in a generally low-density rural area, with few

structures or population centers nearby. Therefore, the project would have a **less-than-significant impact** related to exposing people or structures to significant risks, including downslope flooding, landslides, runoff, and post-fire slope instability.

2.7.4 Cumulative Impact Analysis

The cumulative analysis for wildfire impacts was performed using the projects listed in Table 1-4 in Chapter 1.0, Project Description, Location, and Environmental Setting. Cumulative projects in the area include several existing and proposed wind and solar renewable energy projects, and public facilities improvement projects, all located within the SDCFPD jurisdiction and the region surrounding Boulevard.

2.7.4.1 Cumulative, Emergency Response/Evacuation Plan

In addition to the proposed project, there are several other projects in the vicinity within SDCFPD jurisdiction at various stages of development. Each of these increases the potential for ignition not just during construction and maintenance, but continuously due to the installation of electrical equipment. The region is a fire-prone environment that readily burns if there is an ignition source. Multiple projects that could increase the potential for ignitions and which are situated at a distance from one another would increase the demand for firefighting resources and potentially increase drive times, should there be more than one ongoing fire. It is likely that the area will see continued increase in similar project development in the foreseeable future. Although the project would not introduce a new population to the project area or congest roadways, the project in combination with cumulative projects **would contribute to a cumulatively considerable impact** related to implementing the County's Emergency Operations Plan or the Safety Element of the General Plan (**Impact WF-CU-1**).

2.7.4.2 Cumulative, Exacerbated Wildfire Risk

As previously discussed, implementation of the project could increase the potential sources of ignition both during construction and maintenance activities and with the installation of electrical equipment. The project site is predominantly flat with limited rolling hills and drainages, making slope, wind, and other topographic features unlikely to exacerbate wildfire risks. However, notable geographic features, vegetation, and topography in the region and outside the project site, combined with high wind events, could result in increased fire behavior. There are multiple projects in the SDCFPD jurisdiction at various stages of development, making it likely that periods of construction and maintenance would overlap for projects in the analysis area. Being comparable in scope, these other projects would also increase potential sources of ignition in the project area. Thus, the project, in combination with cumulative projects, **would result in a cumulatively considerable impact** to wildfire risks (**Impact WF-CU-2**).

2.7.4.3 Cumulative, Infrastructure Contribution to Wildfire Risk

The project would include the construction of several primary components with accompanying utility structures. As previously discussed, operation of the BESS could result in an increase in the potential for wildfire ignitions in the unlikely event of a battery fire.

Other projects in the area are similar in nature, mostly solar and wind development projects, which also require accompanying utility structures and possibly BESS. Being comparable in scope, these other projects would also add infrastructure and electrical equipment to the project area, and some projects may also increase human activity in the project area. Thus, the project, in combination with cumulative projects, **would result in a cumulatively considerable impact** to wildfire risks from infrastructure (**Impact WF-CU-3**).

2.7.4.4 Cumulative, Exposure to Post-Fire Risks

The project would have a less-than-significant impact related to post-fire effects, due to the stable, relatively flat land that composes the site. Although there are notable geographic features in the region, the analysis area is not a landslide-susceptible area. In addition, the project would be generally unoccupied and operated remotely, and no habitable structures are proposed by the project. Fire behavior within each project site would be moderated by project design features and required compliance with local, state, and federal regulations related to flooding and slope stability. Thus, the project, in combination with cumulative projects, **would not result in a cumulatively considerable impact** related to the exposure of people or structures to significant risks, including flooding or landslides.

2.7.5 Significance of Impacts Prior to Mitigation

2.7.5.1 Emergency Response/Evacuation Plan

The project site is within SDCFPD jurisdiction and 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 (Figure 2.7-3 and Figure 2.7-4). During construction and decommissioning of the project, there would be personnel on-site and a potential increase in demand for emergency services. However, any increase in the regional population associated with project construction or decommissioning activities is expected to be temporary and minimal. Additionally, as part of **PDF-TR-1** (TCP), the Applicant will establish procedures for coordinating with local emergency response agencies to ensure the dissemination of information regarding emergency response vehicle routes affected by construction and decommissioning activities. This would ensure that worker trips would not result in inadequate emergency access during construction or decommissioning.

Although the proposed project includes a BESS that could result in an increased demand for emergency services in the area in the unlikely event of a battery fire, the project would be generally unoccupied and would not congest roadways such that response times would be delayed. Therefore, the project would result in a **less-than-significant impact** related to impairing implementation of an adopted emergency response or evacuation plan or conflicts with the Safety Element of the General Plan.

2.7.5.2 Exacerbated Wildfire Risk

The project would increase human activities and the potential for ignitions during construction and decommissioning activity. These ignition sources may include mechanized equipment, vehicles, heavy equipment, and installation of electrical equipment. Further, the project proposes the installation of a BESS, which could increase the potential of a wildfire in the unlikely event of a battery fire. Therefore, the project would have a **significant impact** related to exacerbated wildfire risk (**Impact WF-1**).

2.7.5.3 Infrastructure Contribution to Wildfire Risk

The project would include the construction of several primary components with accompanying utility structures. As previously discussed, construction and decommissioning activities could potentially increase fire risk at the project site. Further, BESS operation could result in an increase in the potential for wildfire ignition at the project site in the unlikely event of a battery fire. Therefore, the project would have a **significant impact** related to infrastructure that would exacerbate fire risk (**Impact WF-2**).

2.7.5.4 Exposure to Post-Fire Risks

As analyzed in Section 3.1.3, Geologic Hazards, Soils, and Paleontological Resources, the project site is not sited within a landslide-susceptible area. The project would also be generally unoccupied and operated remotely, and no habitable structures are proposed by the project. Therefore, the project would have a **less-than-significant impact** related to exposing people or structures to significant risks, including downslope flooding, landslides, runoff, and post-fire slope instability.

2.7.6 Mitigation Measures and Project Design Features

2.7.6.1 Mitigation Measures

Mitigation measures **M-WF-1** through **M-WF-6** would mitigate potential impacts under **Impact WF-1** and **WF-2** and **Impacts WF-CU-1** through **WF-CU-3** as follows.

M-WF-1 **Fire Protection Plan**. The following items ensure adequate fire mitigation, access, and safety:

1. Six 10,000-gallon water tanks shall be available on-site: one tank shall be at each of the two entrances and one tank shall be located by each battery energy storage system (BESS); the other two shall be spread strategically across the project site. Each tank shall be labeled "Fire Water: 10,000 gallons" with reflective paint. All tanks shall have fire department connections available and a minimum 250-gallon-per-minute flow.
2. Increased road width near water storage tanks shall accommodate filling without blocking the road.
3. A Knox Box shall be placed at every gated project entrance to allow emergency service resources to access the site.
4. A lighted map identifying equipment and structures shall be available at every project entrance.
5. The project has adequate emergency response according to land use designation, ensured with a Fire Services Agreement.
6. There shall be a built-in heat detection and fire protection system and a fire extinguishing system for each BESS in compliance with NFPA Standard 855. The heat and fire detection system shall be linked to an automatic inert gas suppression system within each cabinet. The cabinets shall also have an interior aerosol fire suppression system.
7. An internal perimeter road with an improved width of 24 feet, and internal roads improved to 20 feet and the capability to handle a weight of 75,000 pounds, designed to accommodate fire apparatuses with an inner turning radius of 28 feet, shall provide essential access infrastructure.

M-WF-2 **Fuel Modification Zones**. Fuel Modification Zones (FMZs) shall be implemented and maintained as follows:

1. An FMZ for each phase of the project shall be in place before any combustible material is brought on-site.

2. Designated areas shall be mowed, brushed, chipped, or otherwise reduced to a vegetation height of less than 6 inches. Material may remain on-site, as long as it is spread out to a depth of no more than 6 inches. Alternative methods of vegetation control include manual removal, herbicide application, prescribed herbivory, or installation of weed barriers in certain areas, such as beneath the PV modules.
3. A 30-foot FMZ around the perimeter ~~between~~ from the fence line ~~and~~ (including the internal perimeter road) shall reduce vegetation to less than 6 inches and be regularly maintained.
4. Vegetation shall be maintained to 10 feet on either side of every interior access road, ensuring minimum unobstructed vertical clearance of 13 feet and 6 inches.
5. A 100-foot FMZ around each BESS shall reduce vegetation to less than 6 inches in height and be regularly maintained.
6. A 30-foot FMZ around the collector substation pad shall reduce vegetation to less than 6 inches in height and be regularly maintained.
7. Vegetation under PV modules shall be maintained to a vertical height of no more than 6 inches.
8. If deemed necessary by County Fire, ~~Vegetation~~ vegetation within the ~~14~~ internal open space easements shall be ~~maintained to a vertical height of no more than 6 inches~~ selectively cleared by hand to the extent required by written order for the express purpose of reducing an identified fire hazard.

M-WF-3 **Battery Energy Storage System Measures**. The following measures shall be incorporated to reduce wildfire risk to the BESS and to reduce spread potential from a fire starting in the BESS:

1. Each BESS shall be constructed on concrete pads and enclosed.
2. Each unit shall be separated by a drive aisle for easy access.
3. Automatic internal heat detecting system shall be linked to an inert gas system.
4. Each BESS shall have an internal aerosol suppression system that is regularly tested and maintained.
5. A 100-foot FMZ will surround each BESS to further reduce risk of fire spread.

M-WF-4 **Construction Fire Protection Plan**. The following shall be implemented based on the FPP guidance (see Appendix L):

1. An FMZ for each phase of the project shall be in place before any combustible material is brought on-site.
2. Continual training in fire prevention, communication, and fire reporting shall be provided to all on-site personnel.
3. Smoking shall be limited to designated areas that are free of vegetation and combustible materials for a minimum 30-foot distance.
4. Two water tenders (at least 3,000 gallons each) shall remain on-site until project water supply tanks are installed.
5. Two water tank trucks (at least 300 gallons each) shall remain on-site during construction and shall be within 0.25 mile of active construction areas.

6. Daily fire risk briefings shall be held with all on-site personnel.
7. Hot work shall be done under supervision in an approved area.
8. All motors on-site shall be equipped with a spark arrestor by the manufacturer.
9. Evacuation routes shall be maintained and cleared; these routes shall never be used as parking spaces.
10. Spills of combustible, hazardous, or potentially dangerous materials shall be cleaned up immediately.
11. Electrical equipment shall be unplugged when not in use, and there shall be no "jerry rigging" of extension cords.
12. All extension cords shall be rated appropriately for the work and properly grounded.
13. All vehicles shall carry, at a minimum, an approved fire extinguisher and shovel.
14. All equipment and vehicles shall be properly maintained.
15. A cache of firefighting tools and water shall be at the main staging area or at another location approved by the Site Safety Officer.

M-WF-5 **Red Flag Warning Measures**. During Red Flag Warnings the following precautions shall be taken:

1. No hot work shall be conducted during Red Flag Warnings.
2. No vehicle shall be permitted to drive over vegetation; vehicles must remain on roads or areas that are devoid of flammable vegetation.
3. "Red Flag" signage shall be displayed at the project main gate and construction office on days when the warning is issued.

M-WF-6 **Fire Protection and Mitigation Agreement.** As a condition to providing service and pursuant to the Safety Element of the General Plan, the Applicant shall enter into a Fire Protection and Mitigation Agreement with the San Diego County Fire Protection District (SDCFPD) prior to approval of a Major Use Permit to make a fair share contribution toward local emergency response capabilities. The funding shall be used by the SDCFPD to mitigate risks of wildfires and to enhance fire suppression and emergency services capabilities for the proposed project and the southeast portion of CSA 135.

2.7.6.2 Project Design Features

The Applicant has identified and committed to including the following project design features as part of the project to alleviate adverse wildfire effects, to the extent feasible.

PDF-TR-1 **Traffic Control Plan.** Prior to obtaining a grading permit from the County of San Diego, the Applicant will implement a construction Traffic Control Plan (TCP) that includes the following measures:

1. Temporary traffic control devices in accordance with the California Department of Transportation's (Caltrans) California Manual on Uniform Traffic Control Device to identify locations/sections where construction is ongoing. This may include slow-moving-vehicle warning signs, signage to warn of merging trucks, barriers for separating construction and non-construction traffic, use of traffic control

flaggers, and any additional measures required for the sole convenience of safely passing non-construction traffic (including transit, bicyclists, and pedestrians) through and around construction areas.

2. Coordination with Caltrans to secure the necessary encroachment and trip permits necessary for specialized haul trucks. Also, any excessive height/length vehicles should use pilot car services to provide safe over-the-road operations and overhead height warnings, if necessary.
3. Notification of the California Highway Patrol, if necessary, to facilitate slowing freeway traffic to ensure safe access for motorists.
4. Coordination with Caltrans, California Highway Patrol, and County officials, including the Sheriff's department. For the State Highway System, Caltrans requires a TCP to be submitted to District 11's Transportation Permits Issuance Branch at least 30 days prior to the start of any construction.
5. Employment of a contract transport company that will be responsible for surveying the route to determine how turns on existing roads will be accomplished and ensuring that is reflected in the TCP.
6. Establishment of procedures for coordinating with local emergency response agencies to ensure dissemination of information regarding emergency response vehicle routes affected by construction activities.

2.7.7 Conclusion

2.7.7.1 Emergency Response/Evacuation Plan

The project site is within the SDCFPD jurisdiction. There is 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 capabilities. During construction and decommissioning of the project, there would be personnel on-site and a potential increase in demand for emergency services. However, any increase in the regional population associated with project construction or decommissioning activities would be temporary and minimal. Additionally, as part of **PDF-TR-1** (TCP), the Applicant will establish procedures for coordinating with local emergency response agencies to ensure the dissemination of information regarding emergency response vehicle routes affected by construction and decommissioning activities. This would ensure that worker trips would not result in inadequate emergency access during construction or decommissioning.

The proposed project includes a BESS, which could result in an increased demand for emergency services in the area in the unlikely event of a battery fire during operations. However, the project would remain generally unoccupied during operations and would be operated remotely. Therefore, the project would not increase congestion on roadways thereby slowing emergency response to the project site or surrounding areas. Further, the project would not interfere with the adopted Emergency Operations Plan.

Therefore, impacts related to emergency response, emergency evacuation, and Safety Element of the County General Plan conflicts would be **less than significant.**

2.7.7.2 Exacerbated Wildfire Risk

The project would increase human activities and the potential for ignitions during construction and decommissioning activity. These ignition sources may include mechanized equipment, vehicles, heavy

equipment, and installation of electrical equipment. Further, the project proposes installation of a BESS, which could potentially increase the potential of a wildfire in the unlikely event of a battery fire (**Impact WF-1**). However, the project would implement the following mitigation measures to reduce exacerbated wildfire risks.

M-WF-1 requires the implementation of numerous risk reduction measures to ensure adequate fire mitigation, internal project site access, and safety during construction, operation, and decommissioning activities. **M-WF-2** would require the implementation and maintenance of FMZs, which would reduce wildfire risks during project operations. **M-WF-3** requires the incorporation of safety measures that would reduce fire risk at the BESS and would reduce the spread potential from a fire starting in the BESS. **M-WF-4** requires the implementation of a Construction Fire Protection Plan, which would reduce wildfire ignition risk during construction and decommissioning activities. **M-WF-5** outlines precautions during elevated weather conditions to minimize the potential of uncontrolled spread of a wildfire. Lastly, **M-WF-6** requires the Applicant to enter into a Fire Protection and Mitigation Agreement with the SDCFPD to make a fair share contribution toward local emergency response capabilities (see Appendix P). These measures are consistent with the recommendations of the comprehensive FPP and applicable fire codes (see Appendix L). The FPP provides fire behavior modeling for on-site and off-site fuels, including under worst-case-scenario conditions. The results from the modeling would provide guidance for design and measures to lessen the threat of and hazards from ignitions and wildfires, including specifically during construction activities.

Therefore, implementation of mitigation measures **M-WF-1** through **M-WF-6** would reduce the risk of exacerbated wildfires to a **less-than-significant** level.

2.7.7.3 Infrastructure Contribution to Wildfire Risk

The project would include the construction of several primary components with accompanying utility structures. As previously discussed, construction and decommissioning activities would increase fire risk at the project site. Further, operation of the BESS could result in an increase in the potential for wildfire ignition in the unlikely event of a battery fire (**Impact WF-2**). However, the project would implement the mitigation measures **M-WF-1** through **M-WF-6**, identified in the FPP and described above, to reduce impacts associated with the installation or maintenance of infrastructure that would contribute to wildfire risk to a **less-than-significant** level.

2.7.7.4 Exposure to Post-Fire Risk

The project site is predominately flat with some hilly slopes and drainages, and it is not within an area mapped for landslide hazards. The project is required to comply with local, state, and federal regulations related to flooding and slope stability. In addition, the project would be generally unoccupied and operated remotely, and no habitable structures are proposed by the project. Therefore, the project would have a **less-than-significant impact** related to exposing people or structures to significant risks, including downslope flooding, landslides, runoff, and post-fire slope instability.

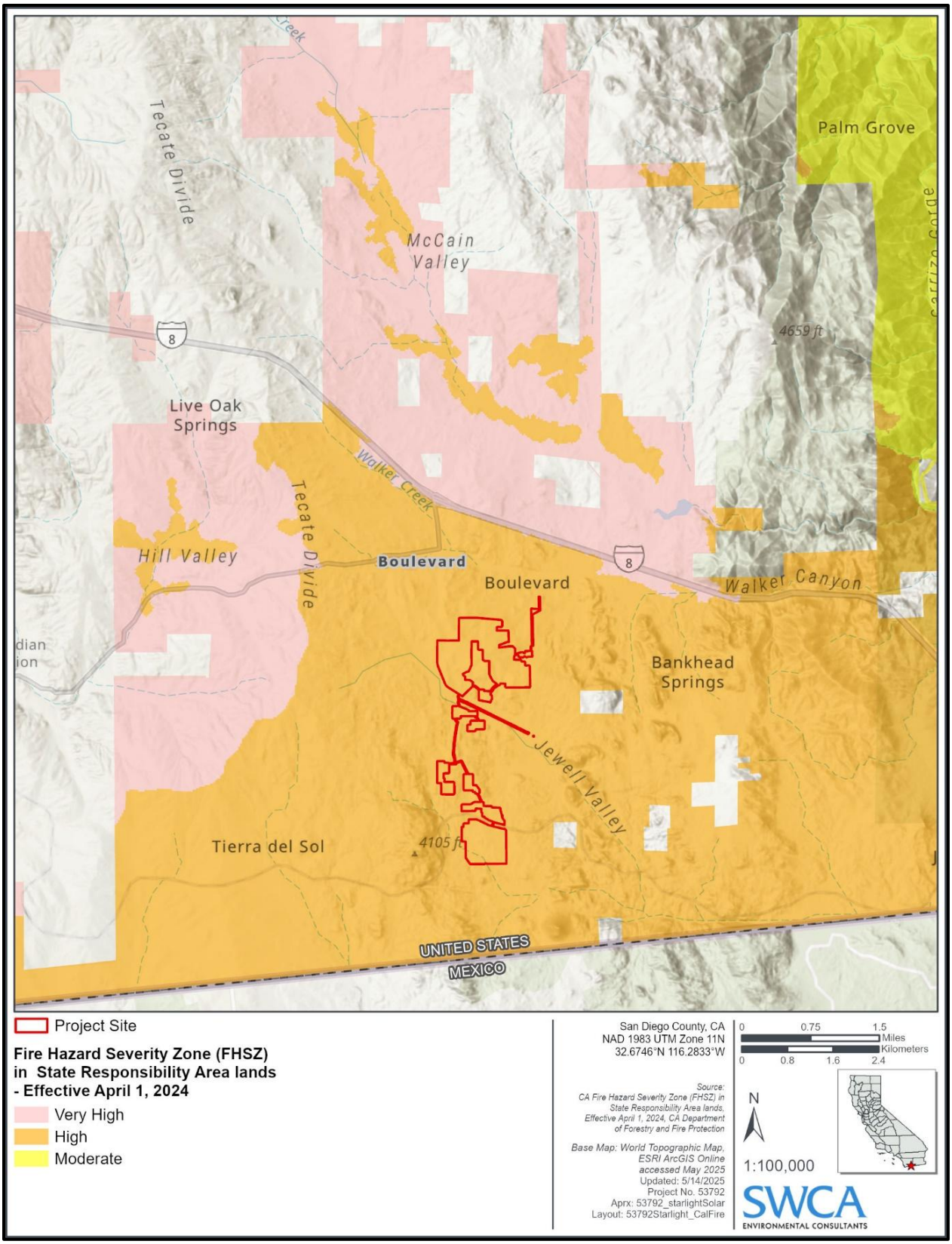

Figure 2.7-1. CAL FIRE–designated Fire Hazard Severity Zones in the Project Area

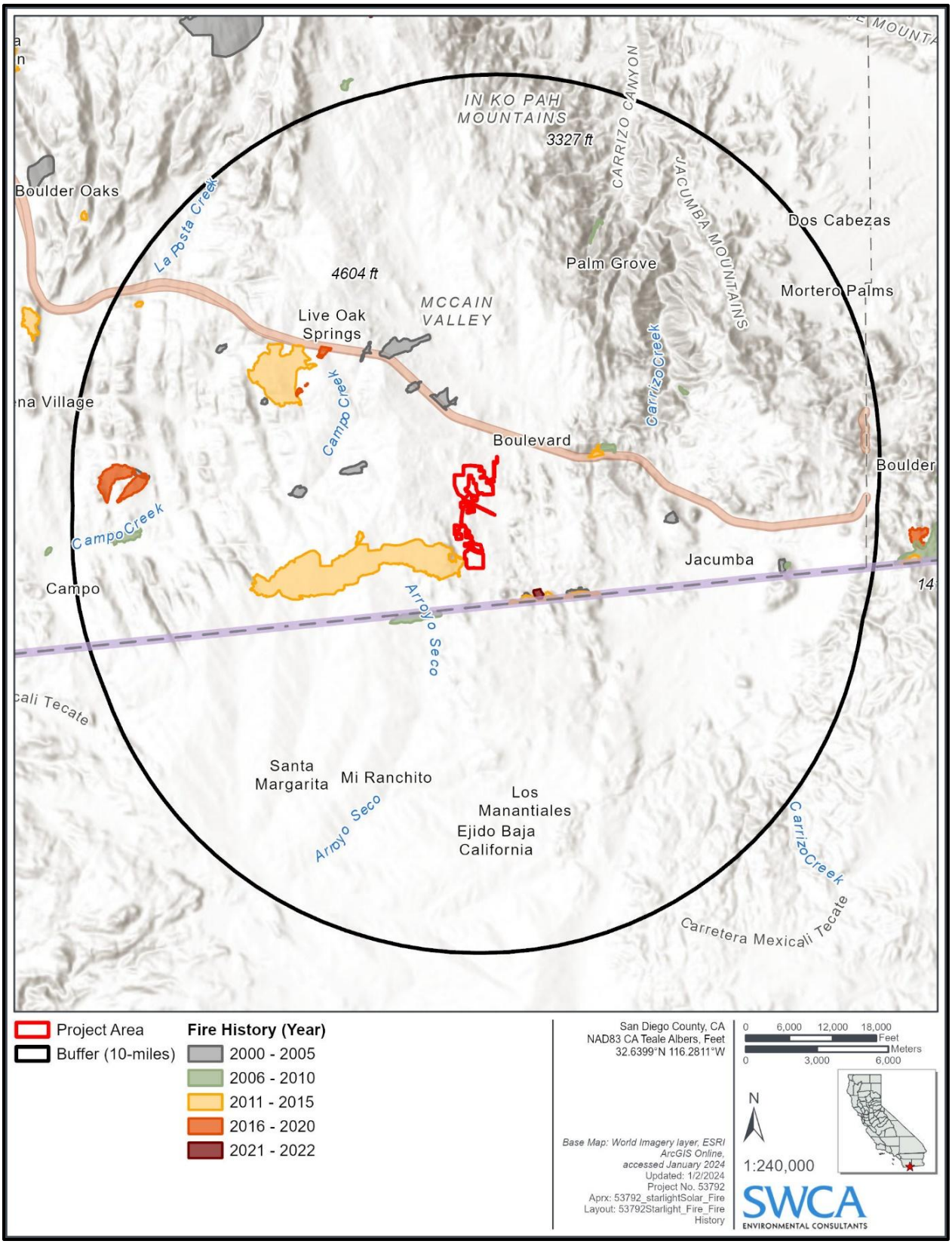

Figure 2.7-2. Fire History within 10 Miles of the Project Site

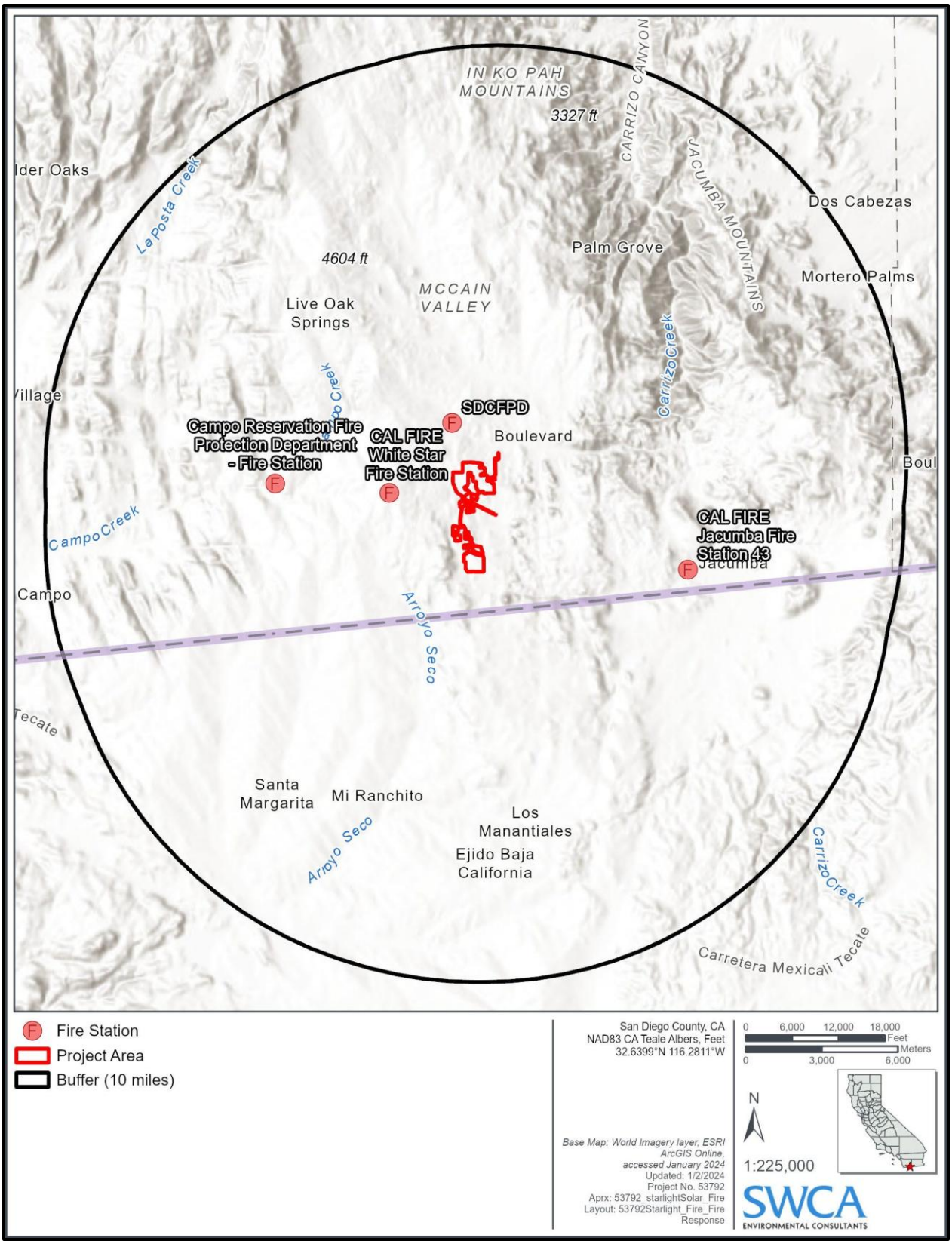

Figure 2.7-3. Fire Stations in the Project Vicinity

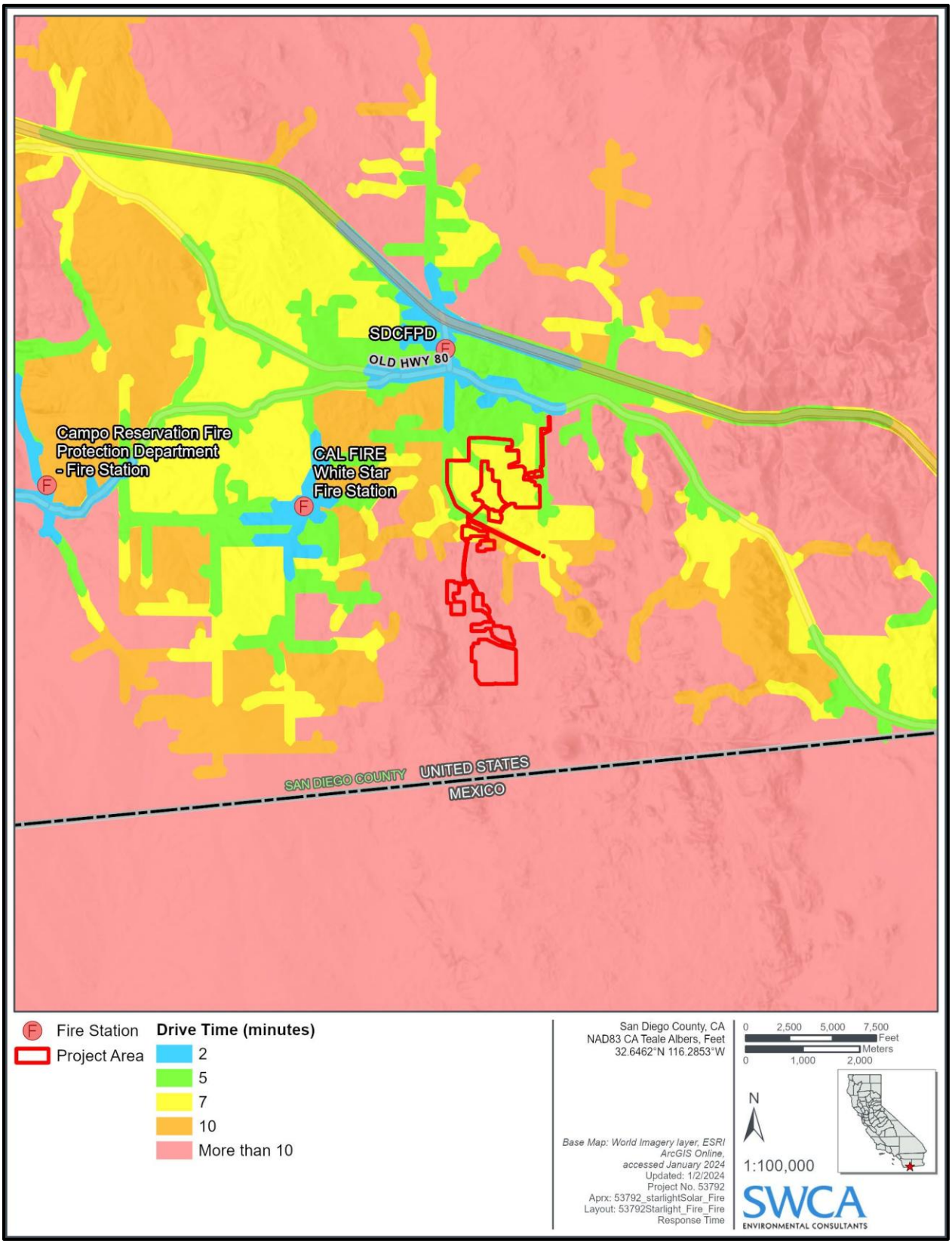

Figure 2.7-4. Fire Stations within a 10-minute Drive Time to the Project Area

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