

## **4.12 PUBLIC SERVICES**

This section includes an evaluation of potential impacts for identified public services that could result from implementation of the proposed projects. Public services include fire protection, law enforcement, libraries, and schools. Each subsection includes descriptions of existing facilities, service standards, and potential environmental impacts resulting from implementation of the proposed projects, and mitigation measures where appropriate. Section 4.13, Recreation, of this Environmental Impact Report (EIR) evaluates impacts associated with recreation, and Section 4.15, Utilities/Service Systems, evaluates impacts related to water supply, wastewater, and other utilities. The impact assessment provides an evaluation of potential adverse effects to public services based on criteria derived from the California Environmental Quality Act (CEQA) Guidelines in conjunction with actions proposed in Chapter 3, Project Description.

The Initial Study/Notice of Preparation prepared for this EIR determined that the projects would not result in impacts to schools, parks and other public facilities. Therefore, these issue areas will not be discussed further. The Initial Study/Notice of Preparation is included in Appendix A of this EIR.

### **4.12.1 Environmental Setting**

The project study areas are located in unincorporated Imperial County, southwest of the City of El Centro and just north of the U.S./Mexico border. The project study areas are located within the Imperial County Fire Department and Office of Emergency Services (ICFD/OES) and the Imperial County Sheriff Department's areas of service.

#### **4.12.1.1 Regulatory Setting**

This section identifies and summarizes State, and local laws, policies, and regulations that are applicable to the projects.

#### **State**

##### **Fire Codes and Guidelines**

The California Fire Code (Title 24, Part 9 of the California Code of Regulations) establishes regulations to safeguard against hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises. The Fire Code also establishes requirements intended to provide safety and assistance to firefighters and emergency responders during emergency operations. The provisions of the Fire Code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure throughout the State of California (CBSC 2010). The Fire Code includes regulations regarding fire-resistance-rated construction, fire protection systems such as alarm and sprinkler systems, fire services features such as fire apparatus access roads, means of egress, fire safety during construction and demolition, and wildland-urban interface areas.

#### **Local**

##### **Imperial County General Plan**

The Imperial County General Plan Seismic and Public Safety Element contains goals and objectives that relate to fire protection and law enforcement pertinent to the proposed projects.

General Plan Policies	Consistency with General Plan	Analysis
<p>Goal 1: Include public health and safety considerations in land use planning.</p> <p>Objective 1.8 Reduce fire hazards by the design of new developments.</p>	Consistent	<p>The project Conditional Use Permit Applications and site plans will be reviewed by the Imperial County Fire Department to ensure that all site facilities comply with state and local fire codes and fire safety features are met. Additionally, the project applicants have included site design measures into each of the projects to reduce the potential for fire hazards including on-site water tanks for the operations and maintenance (O&amp;M) buildings, and sufficient turnaround areas to allow clearance for fire trucks per fire department standards (70 feet by 70 feet, and 20 foot-wide access road).</p>
<p>Goal 2: Minimize potential hazards to public health, safety, and welfare and prevent the loss of life and damage to health and property resulting from both natural and human-related phenomena.</p> <p>Objective 2.5 Minimize injury, loss of life, and damage to property by implementing all state codes where applicable.</p>	Consistent	<p>See response above for discussion on how the project sites would implement all state and local fire codes and provide site design measures to reduce the potential for fire hazards.</p> <p>With regards to public safety and security, the project sites include perimeter security fencing with cameras, with controlled access gates, and enhanced security fencing where substation areas are located.</p>

### Imperial County Office of Emergency Services – Emergency Operations Plan

The Imperial County Fire Department (ICFD) is the local Office of Emergency Services in Imperial County. The OES Coordinator is the County Fire Chief, who is assisted by an Assistant OES Coordinator who maintains the OES program for the County of Imperial. The Fire Department acts as the lead agency for the Imperial County Operational Area (OA) and provides leadership in all phases of developing the emergency management organization, including public education, training, EOC operations, interagency coordination, and plan development.

The Imperial County Operational Area Emergency Operations Plan (EOP) provides a comprehensive, single source of guidance and procedures for the County to prepare for and respond to significant or catastrophic natural, environmental, or conflict-related risks that produce situations requiring coordinated response. The EOP is consistent with the requirements of the Standardized Emergency Management System (SEMS) as defined in Government Code Section 8607(a) and the U.S. Department of Homeland Security National Incident Management System (NIMS) for managing response to multi-agency and multi-jurisdictional emergencies.

### County Evacuation Plans

As mentioned above, the Imperial County Operational Area Emergency Operations Plan (EOP) provides guidance and procedures for the County to prepare for and respond to emergencies. The EOP designates the Sheriff's Department as having jurisdiction in an emergency involving evacuation within the unincorporated areas of the county and within contract cities.

#### 4.12.1.2 Existing Conditions

### Fire Protection Services

The project study areas are located within the ICFD/OES area of service. ICFD/OES currently has five fire stations serving the entire 4,500 square miles of unincorporated Imperial County. The stations are located

in the following areas: Station 1, Imperial; Station 2, Heber; Station 3, Seeley; Station 4, Imperial (under contract with the City of Imperial); and Station 4, Palo Verde. The ICFD/OES currently has a total staff of 59 personnel with 8 staff personnel, 31 full-time suppression personnel, and 20 reserve personnel. All county stations are staffed 24 hours a day and 7 days a week with at least three firefighters, except for Station 5, which has on-call personnel from 5:00PM to 8:00 AM. The ICFD/OES Emergency Units strive to maintain a response time of 1.5 minutes after receiving the initial tone for service. The closest fire station to the project study areas is Station 2 at 1078 Dogwood Road in Heber California. This station is approximately four miles northwest of Calexico Solar Farm 2 (CSF2(A) or (B)).

## **Police Protection Services**

Imperial County Sheriff's Department is responsible for police protection services in the unincorporated areas of Imperial County and the City of Holtville. The patrol function is divided between North County Patrol, South County Patrol, Palo Verde Patrol and Winterhaven Patrol. Deputies assigned to the Patrol Divisions are the "first responders" to a call for law enforcement service. The main patrol station is located in El Centro on McCabe Road. Sheriff substations are located in the communities of Brawley, Salton City, and Winterhaven, with resident deputies located in the unincorporated community of Palo Verde. Under an existing mutual aid agreement, additional law enforcement services would be provided if and when required by all of the cities within the county as well as with Border Patrol and the California Highway Patrol (CHP). The CHP provides traffic regulation enforcement, emergency accident management, and service and assistance on state roadways and other major roadways in the unincorporated portions of Imperial County.

### **4.12.2 Impacts and Mitigation Measures**

This section presents the significance criteria used for considering project-related land used compatibility impacts and consistency with applicable planning documents, the methodology employed for the evaluation, and mitigation requirements, if necessary.

#### **4.12.2.1 Thresholds of Significance**

Based on Appendix G of the CEQA Guidelines and the professional judgment of County staff and consultants, the County concludes that the projects would result in significant environmental impacts if it would result in 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; and
- Other public facilities.

As mentioned previously, it was determined through the preparation of an Initial Study that the projects would not result in impacts to schools, parks or other public facilities. Therefore, those issue areas will not be discussed further.

#### **4.12.2.2 Methodology**

Evaluation of potential fire and police service impacts of the proposed projects was based on consultation with the ICFD, Sheriff's Department and review of other development projects in the area.

### 4.12.2.3 Impact Analysis

IMPACT 4.12-1	Increased Demand on the ICFD. Implementation of the projects would result in the need for additional fire protection services during construction and operational activities.
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#### **MSSF1, CSF1(A), CSF1(B), CSF2(A), CSF2(B), OTF-Private Land, OTF-BLM Land**

The projects would result in an increase in demand for fire protection services over existing levels. Up to five operations and maintenance (O&M) buildings are contemplated and would include their own emergency power, fire suppression, and potable water systems. Additional auxiliary facilities would include lighting, grounding, backup uninterruptable power supply (UPS) systems and diesel power generators, fire and hazardous materials safety systems, security systems, chemical safety systems, and emergency response facilities. As discussed in the Conditional Use Permit (CUP) applications for the projects, fire protection measures are incorporated as part of project design features including portable carbon dioxide (CO<sub>2</sub>) fire extinguishers mounted outside inverter/electrical distribution containers on pads throughout the solar arrays. The facilities will maintain the required volume of water required for fire fighting, based on the number and sizes of structures located on the sites. As discussed in Chapter 3.0 Project Description, a 10,000-gallon on-site water storage tank would be provided for each of the O&M buildings constructed and are intended for the fire protection of the O&M buildings. The firewater storage tanks will be located within 150 feet of the O&M buildings. The O&M building would also have access to a wet-fire connection to provide sufficient fire protection. Both the access and service roads (along the perimeter of the project facilities) would have turnaround areas to allow clearance for fire trucks per fire department standards (70 feet by 70 feet, and 20 foot-wide access road). Additionally, fire protection for the solar arrays and the OTF-Private Land and OTF-BLM Land will be provided by vegetation management programs as part of project design measures. As such, the projects would not result in a need for fire facility expansion. Decommissioning of the projects at the end of its 40-year life would occur through implementation of a required Restoration Plan. These activities would not be anticipated to result in an increased need for fire protection services.

Imperial County requires payment of impact fees for new development projects. Fire Impact Fees are imposed pursuant to Ordinance 1418 §2 (2006), which was drafted in accordance with the County's TischlerBise Impact Fee Study. The ordinance has provisions for non-residential industrial projects based on square footage. The project applicant(s) will be required to pay the fire protection services' impact fees. Furthermore, a Fiscal Impact Analysis is being prepared for these projects, which would identify any additional special fees or conditions that would be required as part of the projects in order to ensure County fire services can be adequately maintained. These fees would be included in the Conditions of Approval for the CUPs. No new fire stations or facilities would be required to serve the projects. Impacts would therefore be **less than significant**.

#### **Mitigation Measure(s)**

No mitigation measures are required.

IMPACT 4.12-2	Increased Demand on the Imperial County Sheriff Department. Implementation of the projects would result in the need for additional police protection services during construction and operational activities.
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#### **MSSF1, CSF1(A), CSF1(B), CSF2(A), CSF2(B), OTF-Private Land, OTF-BLM Land**

The projects would result in an increase in demand for law enforcement protection services over existing levels. Emergency response times can vary due to the large patrol area of the County. Depending on the

location of the deputy, response times can range from approximately five minutes to one hour; however, emergency calls involving public safety would take priority.

The projects do not include a residential component; therefore, it would not result in a substantial addition of residents to the Sheriff Department's service area. The combined projects would be staffed with up to 30 full-time employees (up to six for each site) to maintain the facilities seven days a week during normal daylight hours. Typically, up to 15 staff would work during the day shift (sunrise to sunset), and the remainder during the night shifts and weekend. The perimeter of the project facilities would be secured with low voltage security fencing (i.e., for security cameras and sensors), with barbed wire, and no less than eight feet high along each public road. The fence is proposed to be a chain link fence with tan slats. Access to each of the site locations would be provided using a 20-foot minimum swinging or sliding gate. Additionally, controlled access gates would be maintained at entrances into the each of the project site locations. Emergency response personnel (County Fire and Border Patrol) would be provided with manual override capability in order to access the site facilities. Each of the substation areas would be secured by an eight-foot high enhanced security chain-link fence. Lastly, cameras would be utilized throughout the facility and equipped with remote monitoring capabilities to deter vandalism. With these features installed onsite, the security on the solar facilities would be adequate and would not require the addition of staff to the Sheriff's Department. As such, the projects would not result in a need for police facility expansion. Decommissioning of the projects at the end of its 40-year life would occur through implementation of a required Restoration Plan. These activities would not be anticipated to result in an increased need for police services.

Imperial County requires payment of impact fees for new development projects. Police services Impact Fees are imposed pursuant to Ordinance 1418 §2 (2006), which was drafted in accordance with the County's TischlerBise Impact Fee Study. The ordinance has provisions for non-residential industrial projects based on square footage. Furthermore, a Fiscal Impact Analysis is being prepared for these projects, which would identify any additional special fees or conditions that would be required as part of the projects in order ensure County police services can be adequately maintained. The project applicant(s) will be required to pay the police protection services' impact fees as a condition of project approvals. Impacts would therefore be **less than significant**.

**Mitigation Measure(s)**

No mitigation measures are required.

**4.12.3 Decommissioning/Restoration and Residual Impacts**

**Decommissioning/Restoration**

Decommissioning and restoration of the project study areas at the end of their 40-year life would occur and would not result in an increased need for fire and police protection services. These activities would be in the form of disassembling project components, and then restoring the sites to agricultural uses, both of which would not create an increase in demand for police or fire service beyond the level required for the proposed solar operations. Therefore, **no impact** is identified and no mitigation is required for this phase.

**Residual**

With payment of the development impact fees for fire and police protection services, project impacts would be **less than significant**. No mitigation is required, and no residual significant and unmitigated impacts would result.

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