



## 3.12 Public Services

This section includes an evaluation of potential impacts for identified public services that could result from implementation of the proposed VEGA 6 project and Ramon Substation expansion. Public services typically include fire protection, law enforcement, schools, and other public facilities such as parks, libraries, and post offices. Each subsection includes descriptions of existing facilities, service standards, and potential environmental impacts resulting from implementation of the proposed VEGA 6 project and Ramon Substation expansion, and mitigation measures where appropriate. Section 3.15, Utilities/Service Systems, of this EIR 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 CEQA Guidelines in conjunction with actions proposed in Chapter 2, Project Description.

The IS/NOP prepared for this EIR determined that the VEGA 6 project would not result in impacts on schools, parks and other public facilities (libraries and post offices). Therefore, these issue areas will not be discussed further and are included in Chapter 6, Effects Found Not Significant, of this EIR. The IS/NOP is included in Appendix A of this EIR.

### 3.12.1 Existing Conditions

#### VEGA 6

The VEGA 6 project site is located in unincorporated County, approximately 10 miles west from the City of Brawley approximately 5 miles southwest of the community of Westmorland. The VEGA 6 project site is located within the Imperial County Fire Department (ICFD)/Office of Energy Services (OES) and the Imperial County Sheriff Department’s areas of service.

#### *Fire Protection Services*

The project site is located within the ICFD/OES area of service. ICFD/OES currently has nine fire stations and six contracting agencies serving the entire 4,500 square miles of unincorporated Imperial County. The nine ICFD stations are located in the communities of Heber, Seeley, Ocotillo, Palo Verde, Niland, Winterhaven, Salton City, and the City of Imperial (ICFD 2019). Each of the county fire stations is staffed with a Captain, Firefighter, and Reserve Firefighter with the only exception being the Palo Verde station that is staffed with a Firefighter and Reserve Firefighter. Every fire station has a Type I engine as its primary apparatus. The City of Imperial and Heber stations also house a Ladder Truck along with the Type I engine. The Seeley and Heber stations also house Type III engines. The ICFD Emergency Units strive to respond immediately after receiving the initial tone for service. The actual response time would be determined by the area of response throughout the vast response area covered.

The closest fire station to the project is site is the Imperial station located at 2514 La Brucherie Road in Imperial, California. This station is located approximately 14 miles southeast of the project site.

#### *Police Protection Services*

Imperial County’s 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, East County Operations, and City of Holtville. 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 Applestill Road. Sheriff substations are located in the communities of Brawley, Niland, 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. The California Highway Patrol 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.

The closest sheriff's station to the project site is located at 220 Main St #207 in Brawley, California. This station is approximately 9 miles southeast of the project site.

## Ramon Substation Expansion

### *Fire Protection Services*

Fire protection services for the project site are provided by the Riverside County Fire Department (RCFD). Regionally, RCFD provides fire, emergency medical, and rescue services from 94 stations. RCFD serves over 2.5 million residents throughout 20 cities and all unincorporated portions of Riverside County. The Ramon Substation expansion area is located within the Battalion 10 response area. RCFD Station No. 35 located at 31920 Robert Road in Thousand Palms is the closest fire station and would provide initial response to the Ramon Substation expansion area. This station is approximately 1.7 miles west of the expansion area.

### *Police Protection Services*

The Riverside County Sheriff's Department provides community policing for the Ramon Substation expansion area. The sheriff station serving the expansion area is the Palm Desert Station, located at 73705 Gerald Ford Drive, approximately 2.3 miles south of the expansion area. In addition to community policing, other services provided by the Sheriff's Department include, but are not limited to, operating of the emergency 911 system, operating correctional facilities, performing traffic control, and providing crime prevention education.

## 3.12.2 Regulatory Setting

This section identifies and summarizes federal, state, and local laws, policies, and regulations that are applicable to the project.

### State

#### *Fire Codes and Guidelines*

The California Fire Code (Title 24, Part 9 of the CCR) 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. 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 VEGA 6 project. An analysis of the project’s consistency with the applicable goals and objectives of the Seismic and Public Safety Element is provided in Table 3.12-1.

**Table 3.12-1. Project Consistency with Applicable General Plan Seismic and Public Safety Element**

Applicable General Plan Policies	Consistency Determination	Analysis
<b><i>Seismic and Public Safety</i></b>		
Goal 1: Include public health and safety considerations in land use planning.	Consistent	The VEGA 6 project’s CUP application and site plan will be reviewed by the Imperial County Fire Department to ensure that the facility complies with state and local fire codes and fire safety features are met.
Objective 1.8: Reduce fire hazards by the design of new developments		
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.	Consistent	See response above for a discussion on how the VEGA 6 project would implement all state and local fire codes to reduce the potential for fire hazards. With regards to public safety and security, the VEGA 6 project would include 6-foot tall perimeter security fencing with barbed wire and a motion detection system and closed-circuit camera system. In addition, the points of ingress/egress would be accessed via locked gates that can be opened by any emergency responders.
Objective 2.5: Minimize injury, loss of life, and damage to property by implementing all state codes where applicable.		

Source: ICPDS 1997  
 CUP = conditional use permit

*Imperial County Office of Emergency Services – Multi-Hazard Mitigation Plan*

The ICFD is the local Office of Emergency services in Imperial County. Imperial County has developed the multi-jurisdictional hazard mitigation plan (MHMP) to create a safer community. The purpose of

the MHMP is to significantly reduce deaths, injuries, and other disaster losses caused by natural and human-caused hazards in Imperial County. The MHMP describes past and current hazard mitigation activities and outlines goals, strategies, and actions for reducing future disaster losses. The Imperial County MHMP is the representation of the County's commitment to reduce risks from natural and other hazards and serves as a guide for decision-makers as they commit resources to reducing the effects of natural and other hazards. The jurisdictions included in the MHMP include the cities of Brawley, Calexico, Calipatria, El Centro, Holtville, Imperial, and Westmoreland, the IID and the Imperial County Office of Education. The MHMP complies with all federal, state, and local laws guiding disaster management.

#### *Imperial County Emergency Operations Plan*

The Imperial County 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.

#### *Riverside County General Plan*

The Riverside County General Plan includes several policies related to public services that are enforced to minimize the potential impacts on the County's citizens, property, and economy.

#### **LAND USE ELEMENT**

- **LU 5.1** Ensure that development does not exceed the ability to adequately provide supporting infrastructure and services, such as libraries, recreational facilities, educational and day care centers transportation systems, and fire/police/medical services.
- **LU 5.2** Monitor the capacities of infrastructure and services in coordination with service providers, utilities, and outside agencies and jurisdictions to ensure that growth does not exceed acceptable levels of service.
- **LU 10.1** Require that new development contribute their fair share to fund infrastructure and public facilities such as police and fire facilities.

#### *Riverside County Ordinance No. 787 – Fire Code Standards*

Ordinance No. 787 is also known as the County's Uniform Fire Code adopts the most recent 2019 California Fire Code, California Code Regulations, Title 24, Part 9 to govern the safeguarding of life and property from fire, explosion hazards, and hazardous conditions and to regulate the issuance of permits and collection of fees.

### **3.12.3 Impacts and Mitigation Measures**

This section presents the significance criteria used for considering project impacts related to public services, the methodology employed for the evaluation, an impact evaluation, and mitigation requirements, if necessary.

#### **Thresholds of Significance**

Based on CEQA Guidelines Appendix G, project impacts related to public services are considered significant if the project 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
- Other Public Facilities

As mentioned previously, it was determined through the preparation of an IS/NOP that the VEGA 6 project would not result in impacts on schools, parks, or other public facilities. Therefore, those issue areas will not be discussed further and are included in Chapter 6, Effects Found Not Significant, of this EIR.

## Methodology

Evaluation of potential fire and police service impacts of the proposed VEGA 6 project was based on consultation with the ICFD, Sheriff's Department and review of other development projects in the area. Evaluation of potential fire and police service impacts of the proposed Ramon Substation expansion was based on consultation with the RCFD and Sheriff's Department.

## Impact Analysis

***Impact 3.12-1 Would the project 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 fire protection?***

### VEGA 6

The VEGA 6 project would result in a minor increase in demand for fire protection services over existing levels. No operation and maintenance (O&M) buildings are being proposed. Additional auxiliary facilities would include lighting, grounding, , fire and hazardous materials safety systems, security systems, chemical safety systems, and emergency response facilities. The VEGA 6 project also includes a BESS, located near the proposed substation. The BESS would consist of either lithium ion or flow batteries, capable of storing up to 160 MW. The batteries will either be housed in storage containers or buildings fitted with heating, ventilation, and air conditioning and fire suppression systems.

The VEGA 6 project site is located in the unincorporated area of Imperial County. According to the Seismic and Public Safety Element of the General Plan (County of Imperial 1997), the potential for a major fire in the unincorporated areas of the County is generally low. As discussed in Chapter 2, Project Description, primary access to the VEGA 6 project site would be located off SR 78, across the Westside Main Canal via county roadways (Garvey Road and Andre Road). Internal to the solar energy facility site, up to 30-foot-wide roads would be provided between the PV arrays, as well as around the perimeter of the solar energy facility site yet inside the perimeter security fence to provide access to all areas of the site for maintenance and emergency vehicles. Points of ingress/egress would

be accessed via locked gates that can be opened by any emergency responders. Although the proposed VEGA 6 project would be designed, constructed, and operated in accordance with applicable fire protection and other environmental, health, and safety requirements (e.g., CPUC safety standards), the project applicant will be required to consult and coordinate with the Fire Department to address any fire safety and service concerns (i.e., BESS) so that adequate service is maintained. While the VEGA 6 proposed project may result in an increase in demand for fire protection service, with installation of internal fire prevention systems and ICFD consultation, the VEGA 6 project would not result in an increase in demand that would, in turn, result in a substantial adverse physical impact associated with the provision of new or physically altered fire protection 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. Based on these considerations, the VEGA 6 project would not result in a need for fire facility expansion and a less than significant impact would occur.

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 will be required to pay the fire protection services' impact fees. These fees would be included in the Conditions of Approval for the CUP. No new fire stations or facilities would be required to serve the project. Impacts would therefore be less than significant.

#### *Ramon Substation Expansion*

The proposed Ramon Substation expansion would not require fire protection services during construction or operation and maintenance beyond response. The Ramon Substation expansion area would continue to be adequately supported by the existing fire protection services since the construction and operation of the substation expansion would not induce growth in the project area and the fire risk would not create the need for new or physically altered fire protection facilities. Operation and maintenance would not affect the ability of fire personnel to respond to fires. The proposed Ramon Substation expansion is not anticipated to result in the need for fire protection facilities, such as a new fire station or the expansion of existing facilities, and thus impacts would be less than significant.

#### Mitigation Measure(s)

No mitigation measures are required.

***Impact 3.12-2 Would the project 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 police protection?***

#### VEGA 6

The VEGA 6 project does not include a residential component; therefore, it would not result in a substantial addition of residents to the Sheriff Department's service area. Although the potential is low, the proposed VEGA 6 project may attract vandals or other security risks and the increase in construction related traffic could increase demand on law enforcement services. Six-foot high chain link fencing topped with barbed wire would be installed around the perimeter of the solar facility site



at the commencement of construction and site access would be limited to authorized site workers. Points of ingress/egress would be accessed via locked gates. In addition, a motion detection system and closed-circuit camera system may also be installed. The site would be remotely monitored 24 hours per day, 7 days per week. In addition, periodic on-site personnel visitations for security would occur during operations and maintenance of the proposed VEGA 6 project, thereby minimizing the need for police surveillance.

The proposed VEGA 6 project may result in a temporary increase in demand for law enforcement service due to the presence of construction equipment and material being stored on-site. With installation of the proposed security features on the project site, the proposed project would not result in an increase in demand that would, in turn, result in a substantial adverse physical impact associated with the provision of new or physically altered sheriff 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. As conditions of approval of the project, the project applicant will be required to participate in the Imperial County Public Benefit Program for the life of this CUP and shall at all times be a party to a public benefit agreement in a form acceptable to County Counsel in order to pay for all costs, benefits, and fees associated with the approved project, and the applicant will be required to reimburse the Sheriff's Department for any investigations regarding theft on the project site and related law enforcement. Approval of this public benefit agreement will be by the Board of Supervisors prior to the issuance of the first building permit. These potential impacts are less than significant.

*Ramon Substation Expansion*

The proposed Ramon Substation expansion would not require police services during construction or operation and maintenance beyond routine patrols and response. The proposed Ramon Substation expansion does not include a residential component; therefore, it would not result in a substantial addition of residents to the Riverside County Sheriff Department's service area. Construction and operation of the Ramon Substation expansion would not induce growth in the project area that would result in the permanent, and increased need of police protection services. The proposed Ramon Substation expansion is not anticipated to result in the need for law enforcement facilities, such as a new sheriff station or the expansion of existing facilities, and thus impacts would be less than significant.

Mitigation Measure(s)

No mitigation measures are required.

3.12.4 Decommissioning/Restoration and Residual Impacts

Decommissioning/Restoration

If at the end of the PPA term, no contract extension is available for a power purchaser, no other buyer of the energy emerges, or there is no further funding of the project, the project will be decommissioned and dismantled. Decommissioning and restoration of the project site would occur and would not result in an increased need for fire and police protection services. Decommissioning of the project would occur through implementation of a required Reclamation Plan. These activities would be in the form of disassembling project components, including the BESS, and then restoring the site to pre-project conditions, 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.