

3.1.8 Public Services

This section discusses potential impacts to public services, including fire protection, police protection, schools, and additional public services, resulting from implementation of the Campo Wind Project with Boulder Brush Facilities (Project). The analysis is based on review of technical data; the Environmental Impact Statement (EIS) prepared by the Bureau of Indian Affairs (BIA) for the Project (BIA 2019); applicable laws, regulations, and guidelines; and the following technical reports prepared for the Project:

- Boulder Brush Facilities Fire Protection Plan (FPP) (Appendix I)
- Boulder Brush Facilities Construction Fire Prevention Plan (CFPP) (Appendix A of Appendix I).
- Boulder Brush Facilities Technical Report for Fire Personnel (Appendix H of Appendix I).

For a detailed discussion regarding wildfire hazards, fire risk, and hazards associated with interference with emergency response resulting from implementation of the Project, refer to Section 2.9, Wildfire, of this Environmental Impact Report (EIR). A discussion regarding parks and recreational services can be found in Section 3.2.3, Parks and Recreation.

Comments received in response to the Notice of Preparation included concerns regarding availability of fire services, support for increased fire services, emergency vehicle access, solid waste management, and recycling during turbine disposal. These concerns are addressed in this section, and additional concerns regarding fire risk are addressed in Section 2.9. A copy of the Notice of Preparation and comment letters received in response to it are included in Appendix A of this EIR.

3.1.8.1 Existing Conditions

Fire Protection

The Project Site is located in east San Diego County, which includes terrain that is favorable to wildfire spread, including steep slopes, ravines, mountains, and valleys. The majority of Project components would be constructed in areas of San Diego County classified as a Very High Fire Hazard Severity Zone (FHSZ) by the California Department of Forestry and Fire Protection (CAL FIRE). There are some small portions within the central portion of the Boulder Brush Corridor that are classified as a High FHSZ (Appendix I). Fire hazard designations are based on topography, vegetation, and weather, among other factors, with more hazardous sites including steep terrain, unmaintained fuels/vegetation, and wildland/urban interface locations.

The Project Site is located in an area historically composed of fire-adapted vegetation communities, including chaparral, scrub, and oak woodlands, which are vegetation communities that experience occasional wildfire. These vegetation communities can burn in an extreme manner under the occasional severe fire weather conditions (dry and windy) that occur in the area. Based on the region's fuels, fire history, and expected fire behavior, severe fires may occur, with moderate- to severe-intensity fires expected to occur on the Project Site. The rocky terrain and open fuel beds on the Project Site result in the anticipated moderate-intensity fire behavior. With the anticipated growing population in wildland/urban interface areas, and the region's fire history, it can be anticipated that periodic wildfires would occur in the area. As such, the Project is expected to be vulnerable to recurring wildfire ignition and spread, and may be subject to nearby wildfire that could, under worst-case conditions, spread through the Project Site. Wildland fire from the north, south, east, and west is possible given the existence of undeveloped lands and ignition sources. The most significant wildfire threat is wind-driven wildfire from the northeast/east during Santa Ana conditions. This type of fire would also have the potential to produce embers and is subject to unstable wind patterns, resulting in eddies and wind/terrain-assisted fire running upside canyons and "chimneys."¹ The types of potential ignition sources that currently exist in the area include existing wind energy projects, off-road vehicles, electrical transmission lines, and machinery associated with rural residential, among other sources. Project components such as transformers, transmission lines, and wind turbines would introduce additional potential ignition sources (Appendix I).

Within the unincorporated region of San Diego County, fire and emergency medical services are provided by Fire Protection Districts, County Service Areas, and CAL FIRE. Collectively, there are more than 2,800 firefighters responsible for protecting the unincorporated region from fire. Generally, each agency is responsible for structural fire protection and wildland fire protection within its area of responsibility. However, mutual and automatic aid agreements enable non-lead fire agencies to respond to fire emergencies outside their district boundaries. Interdependencies that exist among the region's fire protection agencies are primarily voluntary, since no local governmental agency can exert authority over another.

The Boulder Brush Facilities are located within the San Diego County Fire Authority (SDCFA) area of responsibility. Emergency response for the Boulder Brush Facilities would be provided, initially, by the SDCFA and/or CAL FIRE from the co-located Fire Station 47 in Boulevard. The Boulevard Fire Station is located at 40080 Ribbonwood Road and is staffed with CAL FIRE and County of San Diego (County) volunteer firefighters. The Boulevard Fire Station is approximately 6.8 miles from the most remote portion of the Boulder Brush Corridor (high-voltage substation location). Fire Station 47 is covered by a single fire engine and paramedic ambulance. The engine is staffed by a Fire Captain and up to three firefighters, and the

¹ Steep valleys, chutes, drainages, and similar terrain are sometimes referred to as "chimneys."

ambulance is staffed by two paramedics. Fire personnel at the station work a typical shift of 72 hours on and 96 hours off, and the paramedic shift is 48 hours on and 96 hours off (Appendix I). Additionally, CAL FIRE jointly manages the McCain Valley Camp in association with the California Department of Corrections and Rehabilitation. Crew levels at the McCain Valley Camp fluctuate, and the response is typically for wildland fires, flood control, and community projects. This facility is located at 2550 McCain Valley Road, approximately 2.6 miles east/southeast of the Project Site (Appendix I). The applicable County fire codes for the Boulder Brush Facilities, and additional measures to directly address fire concerns associated with the Boulder Brush Facilities, are included in the Boulder Brush Facilities FPP, which is Appendix I of this EIR.

The Campo Wind Facilities would be located within the Campo Band of Diegueño Mission Indians Reservation (Reservation) Boundary. The Campo Reservation Fire Protection District (CRFPD) has the responsibility for fire service within the Reservation. CRFPD works with CAL FIRE, when needed, as a responding agency when ground support and air attack assistance are necessary for fire suppression. Through a statewide agreement and an annual statewide operating plan between the BIA Pacific Region and CAL FIRE, CAL FIRE is the primary wildland fire response agency for all federal Native American reservation land, except Hoopa and Tule River. The BIA Pacific Region additionally has an agreement with the Campo Band of Diegueño Mission Indians (Tribe) to provide wildland fire protection. Both the BIA and the Tribe have wildland protection responsibility, but CAL FIRE responsibility is primary in wildlands (AECOM 2012).

CRFPD is located on the Reservation and is staffed by 13 personnel, including one Fire Chief, one Operations Chief, one Prevention Chief, one District Clerk, and nine fire suppression personnel. The CRFPD is a full-time fire department that monitors fuel loads over the Reservation, and commits resources to reducing fire hazards through a fuel reduction program. CRFPD responds to wildland fires, building fires, and medical emergencies. CRFPD also serves La Posta, Manzanita, and Ewiiapaayp Reservations. The CRFPD fire station is located at 36210 Church Road, on the Reservation (CRFPD 2019).

Table 3.1.8-1, Primary Study Area Fire Resources, in this section, and Figure 1-11, Fire Stations, in Chapter 1, Project Description, Location, and Environmental Setting, outline the primary fire resources in the Project Vicinity. For more information on fire protection on the Project Site, and applicable fire protection laws, hazards, and regulations, refer to Section 2.9 and Appendix I of this EIR.

Police Protection

Police protection in the Project Vicinity is served by the County Sheriff's Department, California Highway Patrol, and U.S. Customs and Border Protection (CBP). Table 3.1.8-2, Project Area Police Protection, outlines the primary police protection resources in the Project Vicinity.

The County Sheriff's Department provides general patrol, traffic services, and investigative services to the unincorporated areas of the County and nine contract cities within the County, as well as on tribal reservations. The County Sheriff's Department includes approximately 5,010 sworn and professional employees, and is responsible for patrolling a service area of approximately 4,200 square miles (San Diego County Sheriff's Department 2014). The nearest Sheriff's office to the Project Site is located at 39919 Highway 94 in Boulevard, the Boulevard/Jacumba Office. This office, which is a satellite office to the Pine Valley substation, serves an area of more than 200 square miles and a population of more than 2,000 people (San Diego County Sheriff's Department 2018a). Typically, there are two Sheriff's deputies working 12-hour shifts out of the Boulevard Station, and a 20-minute response time is estimated, thus meeting response time goals outlined in the County General Plan (San Diego County Sheriff's Department 2018b). The next closest Sheriff's office substation to the Project Site is the Campo substation located at 378 Sheridan Road in Campo (approximately 4.4 miles west of the southwest corner of the Reservation). The Campo substation serves an unincorporated area of nearly 300 square miles with a population of approximately 3,000 people. The area includes the San Diego backcountry, and the communities of Campo, Potrero, Tecate, and Dulzura (San Diego County Sheriff's Department n.d.).

The California Highway Patrol separates the state into eight patrol divisions. The Project Site is located within California Highway Patrol's Border Division, which is headquartered in the Kearny Mesa community of the City of San Diego and maintains 12 area offices and approximately 1,280 employees. The closest California Highway Patrol offices to the Project Site are located in the Cities of El Cajon and El Centro (CHP 2018).

CBP also maintains a strong presence in southeastern San Diego County. The Boulevard CBP station, formerly a substation of the Campo CBP station, is located at 39701 Avenida de Robles Verdes. The Campo CBP station is located at 32355 Old Highway 80 in the unincorporated community of Pine Valley. The Boulevard CBP station is responsible for a patrol area of 500 square miles and two eastbound tactical checkpoints (CBP 2014). CBP officers at the Boulevard CBP station patrol east of Jewel Valley Road to the San Diego County border with Imperial County. The Campo CBP station serves from Campo, California, east to Boulevard, California (CBP 2014). The Project Site is located in the patrol area of the Boulevard CBP station.

Schools

Public schools and educational facilities are mandated by the California Department of Education and administered by the County Board of Education and the County Office of Education. The Mountain Empire Unified School District encompasses more than 660 square miles and serves the Project Site. The district includes four elementary schools, two middle schools, one high school, and an alternative education program (MEUSD n.d.).

Other Public Services

Other public services include hospitals and library services. There are no major hospitals located in southeastern San Diego County. The closest medical center is Kaiser Permanente Children's Hospital, located approximately 35 miles west of the Project Site, and the closest major hospital is Sharp Grossmont Hospital, approximately 50 miles west of the Project Site. Per the analysis in the EIS prepared for the Project under the National Environmental Policy Act (NEPA) (BIA 2019 Section 3.7.2), the El Centro Regional Medical Center, owned by the City of El Centro, is located approximately 50 miles east of the Project Site in Imperial County. The Southern Indian Health Clinic, through the Public Health Service, provides healthcare to the Tribe and six other tribes in the area. Emergency services are provided by Grossmont Hospital in El Cajon. A satellite clinic for Southern Indian Health is currently operating on Church Road. The Southern Indian Health Council Campo Clinic, which provides a comprehensive range of professional healthcare and social services to Tribal members, is located on the Reservation.

Several branch libraries of the County library system are located in the Mountain Empire subregion. The Boulevard County Library is located in the community of Boulevard at 39923 Ribbonwood Road, and is a self-service kiosk. Nearby branches of the County library system are the Jacumba branch (located 44605 Old Highway 80, approximately 5 miles northwest of the Project Site) and the Campo–Morena Village branch (located at 31466 Highway 49, approximately 30 miles west of the Project Site) (San Diego County Library 2018).

3.1.8.2 Regulatory Setting

Tribal Regulations

Under the Campo Lease, the following Tribal regulations and plans are not applicable to the Campo Wind Facilities, although they are described below for informational purposes.

Campo Band of Mission Indians Land Use Code

The Campo Band of Diegueño Mission Indians Land Use Code was adopted by the Tribe on June 15, 1992, and amended on June 1, 2011. The purpose of the Land Use Code is the promotion of

the health, safety, and general welfare of the residents of the Reservation (Campo Band of Mission Indians 2011). The Tribe is guided by the goals of protecting the natural and physical resources on the Reservation set forth in its Land Use Plan.

Campo Band of Mission Indians Land Use Plan

The Campo Band of Mission Indians Land Use Plan was originally adopted by the Tribe in June 1978, and most recently revised and adopted in December 2010. The purpose of the Land Use Plan is to ensure that future development within the Reservation occurs in an environmentally and culturally sustainable manner. In addition, it is important to the Tribe to achieve economic growth, job growth, and improved standard of living. The Land Use Plan is meant to help direct orderly and appropriate growth and change, and includes a Public Facilities and Services Element for Fire Services, which identifies the goals, objectives, policies, and standards of the Reservation (Campo Band of Mission Indians 2010).

Federal Regulations

There are no federal regulations, plans, or standards related to public services that are relevant to the Project.

State Regulations

There are no state regulations, plans, or standards related to public services that are relevant to the Project. For information on fire protection regulations, see Section 2.9.

Local Regulations

Local regulations are applicable to the Boulder Brush Boundary, which is on private land subject to the County's land use jurisdiction. Local regulations are not applicable to the Reservation.

County of San Diego General Plan

Updated (and adopted) in August 2011, the San Diego County General Plan guides future growth in the unincorporated areas of the County, and considers projected growth anticipated to occur within various communities. The County General Plan Land Use Element and Safety Element contain policies that address public services in the County. Policies relevant to the Project related to public services are listed below (County of San Diego 2011a, 2011b). For additional information on County General Plan consistency, see Section 3.1.6, Land Use and Planning, of this EIR.

Land Use Element

- **Policy LU-12.1 Concurrency of Infrastructure and Services with Development.** Require the provision of infrastructure, facilities, and services needed by new development prior to that development, either directly or through fees. Where appropriate, the construction of infrastructure and facilities may be phased to coincide with project phasing.
- **Policy LU-12.3 Infrastructure and Services Compatibility.** Provide public facilities and services that are sensitive to the environment with characteristics of the unincorporated communities. Encourage the collocation of infrastructure facilities, where appropriate.

Safety Element

- **Policy S-3.4 Service Availability.** Plan for development where fire and emergency services are available or planned.
- **Policy S-6.3 Funding Fire Protection Services.** Require development to contribute its fair share towards funding the provision of appropriate fire and emergency medical services as determined necessary to adequately serve the project.
- **Policy S-6.4 Fire Protection Services for Development.** Require that development demonstrate that fire services can be provided that meet the minimum travel times identified in Table S-1 (Travel Time Standards) (20 minutes in the semi-rural and rural land use designations).
- **Policy S-6.5 Concurrency of Fire Protection Services.** Ensure that fire protection staffing, facilities and equipment required to serve development are operating prior to, or in conjunction with, the development. Allow incremental growth to occur until a new facility can be supported by development.
- **Policy S-12.1 New Law Enforcement Facilities.** Coordinate new law enforcement facilities and services with new development in ways that sustain the provision of comprehensive services at levels consistent with substantially similar areas of the County.
- **Policy S-13.1 Sheriff Facility Locations.** Locate Sheriff facilities to best serve existing and planned development and the corresponding demand for services.
- **Policy S-14.1 Vehicular Access to Development.** Require development to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel, whenever feasible.

Mountain Empire Subregional Plan

The Mountain Empire Subregional Plan (a component of the County General Plan) establishes goals and policies to guide development within the areas of Tecate, Potrero, Boulevard, Campo/Lake

Morena, and Jacumba, which comprise the Mountain Empire subregion of southeastern San Diego County. The goals and policies of the Mountain Empire Subregional Plan are intended to be more specific than those of the County General Plan, since they consider the distinct history, character, and identity of Mountain Empire communities (County of San Diego 2016).

The following goal in the Mountain Empire Subregional Plan relates specifically to public services and the Boulder Brush Facilities under the County's jurisdiction (County of San Diego 2016):

- ***Public Facilities and Services Policy 4.*** Uses proposed for property adjacent to substations or transmission line rights-of-way should be reviewed for possible impacts to the power facilities and vice versa.

Boulevard Subregional Planning Area

The Boulevard Subregional Planning Area document (a component of the County General Plan) establishes goals and policies to guide development within the Boulevard portion of the Mountain Empire subregion. The policies that relate specifically to public services and the Boulder Brush Facilities under the County's jurisdiction are as follows (County of San Diego 2013):

- ***Policy S 1.1.1.*** Seek funding opportunities for year-round staffing of the CAL FIRE and Boulevard Fire and Rescue Department.
- ***Policy S 2.1.1.*** Seek funding opportunities and sponsors to secure emergency supplies and equipment, including emergency generators and adequate and safe fuel storage.

3.1.8.3 Analysis of Project Impacts and Determination of Significance

Guidelines for the Determination of Significance

Although the County as Lead Agency is analyzing the Project as a whole, the County's land use jurisdiction is limited to the Boulder Brush Facilities. BIA has jurisdiction over the Campo Wind Facilities and has prepared an EIS to evaluate Project effects under NEPA (BIA 2019). This analysis hereby adopts and incorporates by reference the EIS. In addition, this EIR section provides an analysis of Project impacts, both on the Reservation and on private lands, pursuant to the requirements of the California Environmental Quality Act and consistent with the County's own guidelines.

The County's Guidelines for Determining Significance do not include guidance on public services. For the purpose of this document, Appendix G of the California Environmental Quality Act

Guidelines (14 CCR 15000 et seq.) applies to the direct and indirect impact analysis, as well as the cumulative impact analysis. A significant impact would result if:

- The project results in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
 - Fire Protection.
 - Police Protection.
 - Schools.
 - Other Public Facilities.

Fire Protection

Project

Major Project components include an approximately 8.5-mile-long generation transmission (gen-tie) line, a high-voltage substation, a 500-kilovolt (kV) switchyard, 60 wind turbines, a 34.5 kV underground electrical collection system, a collector substation, temporary and permanent access roads, temporary and permanent meteorological towers, and an operations and maintenance (O&M) facility. The majority of the Project components would be constructed in areas classified as a Very High FHSZ by CAL FIRE (CAL FIRE 2007). Fire hazard designations are based on topography, vegetation, and weather, among other factors, with more hazardous sites including steep terrain, unmaintained fuels/vegetation, and wildland/urban interface locations. Construction and operation of the Project would be subject to the applicable FPP, as follows:

- The Boulder Brush Facilities FPP is Appendix I of this EIR and outlines the Project's effect on fire protection service levels and steps to mitigate fire risk.
- An FPP will be prepared to the satisfaction of the CRFPD for the Campo Wind Facilities.

A direct increase in demand for fire protection could occur on the Project Site during construction when there is increased activity; higher amounts of fuel sources on site; and a greater number of ignition sources, including from human activities. Potential ignition sources during construction-related activities include chain saws, wood chippers, grinders, torches, earth-moving equipment, and other vehicles that could create sparks, be a source of heat, or leak flammable materials that would increase the possibility of fire.

Fire risk associated with operation of the Project may result from the turbine operations inside the turbine nacelles, non-combustible electrical collection system operations, the O&M facility, and related infrastructure. Many of the components of the Project include fire-risk-reduction design features and code-mandated fire reduction features, including fuel modification zones around Project components. Design features and fire reduction features for Boulder Brush Facilities are described in the FPP, Appendix I to this EIR. Similar features for the Campo Wind Facilities will be provided in an FPP for the Campo Wind Facilities prepared to the satisfaction of the CRFPD. Fuel modification zones and roadways would be cleared and revegetated with fire-resistant vegetation consistent with CRFPD, SDCFA, and CAL FIRE standard defensible space practices.

The Project would include 10 to 12 full-time employees who would be present on the premises during normal business hours and would work out of the O&M facility on the Reservation. Temporary and permanent Project workers would be subject to fire training. Additionally, a health and safety plan would be developed to protect workers and the general public during construction, operations, and decommissioning of the Project. Occupational hazards that could occur during operations and maintenance of the Project would be minimized through adherence to safety standards and use of appropriate protective equipment. Further information regarding the risks of wildfire is provided in Section 2.9 of this EIR.

Emergency medical response is supplemented by fire protection because the first responders to emergency medical situations are sometimes fire response units. Within the SDCFA responsibility area, the County has a cooperative agreement with CAL FIRE to provide emergency services on rural and unincorporated areas of the County, as well as on the Reservation (Appendix I).

The Project proposes permanent staff, up to 12 personnel, on site during operation and maintenance activities. To calculate the emergency call service level, a conservative comparison was applied. Using half of the 24-hour equivalency of 12 people (i.e., 6) and the County fire agencies' estimate of 82 annual calls per 1,000 population (Appendix I), it is estimated that the Project's 6 daylight employees would generate up to 0.5 calls per year ($[82 \div 1,000] \times 6$). Emergency service requirements during operation are not expected to be significantly impacted with an increase of up to 0.5 calls per year for the Boulevard Fire Station, which currently responds to one call per day in its primary service area (Appendix I). Construction of the Project is expected to occur over approximately 14 months and employ a peak maximum of 561 construction workers, which would equate to an estimated 46 calls per year ($[82 \div 1,000] \times 561$) for the temporary construction period. During construction, a conservative estimate of 41 calls over a 14-month period is not expected to generate the need for a new fire facility, and implementation of the Boulder Brush Facilities CFPP (and a Campo Wind Facilities CFPP prepared to the satisfaction of the CRFPD) would lessen the risk of fire emergencies from construction accidents. Additionally, potential emergency calls during construction would be routed to CRFPD for any activity occurring on the Reservation.

With implementation of the FPPs and funding contributions to local fire and emergency response capabilities, as discussed below, the Project is not expected to cause a substantial decline in emergency response times or necessitate the need for new fire protection facilities. Therefore, no new or physically altered fire facilities would need to be constructed that might result in physical environmental impacts as a result of Project implementation. Therefore, the Project would not result in significant impacts related to the need for new or expanded fire protection services, and impacts would be **less than significant**.

Boulder Brush Facilities

Major components of the Boulder Brush Facilities under the County's land use jurisdiction include an approximately 3.5-mile Off-Reservation gen-tie line, a high-voltage substation, a 500 kV switchyard, and temporary and permanent access roads. The majority of the land within the Boulder Brush Corridor is classified as a Very High FHSZ by CAL FIRE (CAL FIRE 2007). Construction and operation of the Boulder Brush Facilities would be subject to the Boulder Brush Facilities FPP, provided as Appendix I to this EIR. The Boulder Brush Facilities would be un-staffed and result in nominal expected potential for calls, since workers would only be on site during periodic inspection or maintenance. Currently, Fire Station 47 is providing adequate response times per the County General Plan, and the Boulder Brush Facilities would not adversely impact response times. During construction of the Boulder Brush Facilities, which is anticipated to occur over approximately 14 months, a conservative estimate of 12 calls per year would potentially be generated. This is based on a peak maximum of 144 construction workers, which would equate to the estimated 12 calls per year ($[82 \div 1,000] \times 144$) for the temporary construction period for Boulder Brush Facilities. The addition of 0.5 calls per year (12 calls per year for the temporary construction period) to a rural fire station (Station 47 is within a short driving distance of the Project Site) that currently responds to approximately one call per day is considered less than significant and would not require the construction of additional fire station facilities based on that increase alone. As presented in the Boulder Brush Facilities FPP, the Boulder Brush Facilities would provide customized measures that address identified potential fire hazards for the Boulder Brush Facilities. The measures are independently established, but would work together to result in reduced fire threat and heightened fire protection (Appendix I).

With implementation of the Boulder Brush Facilities FPP, the Boulder Brush Facilities would contribute funds to local fire and emergency response capabilities, and ensure that fire protection services are able to meet the demand generated. As part of the Boulder Brush Facilities FPP (Appendix I), the Boulder Brush Facilities would also have a Fire Service Developer Agreement with the County, which would outline a fair-share funding agreement for fire services. Funding provided on behalf of the Boulder Brush Facilities would result in direct capital that can be used toward firefighting and emergency response, improvements, and additions such that SDCFA and

area firefighting agencies would be able to perform their duties into the future at levels consistent with the County General Plan.

The response time to the Boulder Brush Facilities from Station 47 would be within the acceptable time frame of 20 minutes designated in the County General Plan. Additionally, a site safety officer would be assigned to manage the Boulder Brush Facilities FPP, ensuring that training, fire prevention, fire suppression, and evacuation measures are implemented during the construction, operational, and decommissioning phases (Appendix I).

With implementation of the Boulder Brush Facilities FPP and funding contributions to local fire and emergency response capabilities (see Appendix I), the Boulder Brush Facilities are not expected to cause a substantial decline in emergency response times or necessitate the need for new fire protection facilities. Therefore, the Boulder Brush Facilities would not result in significant impacts related to the need for new or expanded fire protection services, and impacts would be **less than significant**.

Campo Wind Facilities

BIA has jurisdiction over the Campo Wind Facilities and has prepared an EIS to evaluate Project effects under NEPA (BIA 2019). Generally, the EIS analysis found that, with implementation of a CFPP and FPP prepared to the satisfaction of the CRFPD, the Campo Wind Facilities would not have significant adverse impacts with regard to the effect on fire services. The analysis and conclusions contained in the EIS are incorporated by reference in this analysis.

Major components of the Campo Wind Facilities include 60 wind turbines, a 34.5 kV underground electrical collection system, a 5-mile-long portion of the On-Reservation gen-tie line, temporary and permanent access roads, temporary and permanent meteorological towers, and an O&M facility. The majority of the Campo Wind Facilities would be constructed in areas classified as a Very High FHSZ by CAL FIRE (CAL FIRE 2007). Construction and operation of the Campo Wind Facilities would be subject to an FPP, which would address fire risk, prepared to the satisfaction of the CRFPD. During construction, anticipated to occur over approximately 14 months, a conservative estimate of 14 calls per year would potentially be generated. The CRFPD Fire Station is located within the boundaries of the Project Site. The addition of 0.5 calls per year (14 calls per year for the temporary construction period) to a rural fire station that currently responds to approximately one call per day is considered insignificant and would not require the construction of additional fire station facilities based on that increase alone. First response would be from the CRFPD, which would be capable of responding well below the County's 20-minute response time for the Campo Wind Facilities.

Fire risk associated with operations of the Campo Wind Facilities may result from the wind turbine nacelle operations, the non-combustible electrical collection system operations, the O&M facility, and related infrastructure. Many of the components of the Campo Wind Facilities include fire-risk-reduction design features and code-mandated fire reduction features, including fuel modification requirements. The FPP for the Campo Wind Facilities would provide customized measures that address identified potential fire hazards to the satisfaction of the CRFPD. Additionally, temporary and permanent workers would be subject to fire training, and a health and safety plan would be developed to protect workers and the general public during construction, operations, and decommissioning of the Campo Wind Facilities. Further information regarding the risks of wildfire is provided in Section 2.9 of this EIR.

As outlined in the EIS, the applicable Tribal fire codes and additional measures required for the Campo Wind Facilities directly address the fire concerns associated with the Campo Wind Facilities (BIA 2019). The Tribe enforces fire standards through its adoption of construction codes for all development on Tribal lands, including the International Building Code, National Electrical Code, and International Fire Code. All developers are expected to comply with these codes, as enforced by the Campo Environmental Protection Agency. All facilities would have an adequate level of fire protection. Any additional protection and prevention measures deemed necessary by the Tribe would be implemented by the Developer (Terra-Gen Development Company LLC) at the expense of the Developer.

With implementation of an FPP prepared to the satisfaction of the CRFPD and funding contributions to local fire and emergency response capabilities, the Campo Wind Facilities are not expected to cause a substantial decline in emergency response times or necessitate the need for new fire protection facilities. Therefore, the Campo Wind Facilities would not result in significant impacts related to the need for new or expanded fire protection services, and impacts would be **less than significant**.

Police Protection

Project

Police protection services for the Project would primarily be provided by the County Sheriff's Department office located approximately 1.9 miles east/southeast of the Project Site at 39919 Highway 94 in Boulevard. This office, which is a satellite office to the Pine Valley substation, serves an area of more than 200 square miles and a population of more than 2,000 (San Diego County Sheriff's Department 2018b). Table 3.1.8-2 outlines the primary police protection services in the Project Vicinity.

To limit public access during construction, temporary security fencing would be located around the temporary concrete batch plant, the temporary staging area with stockpiled materials, parking, construction trailer yards, and excavation areas. The fencing would be up to 8 feet tall, consisting of a 6-foot-high chain-link structure with an additional 2 feet of security wiring located at the top. When construction or use within a temporarily fenced area is complete, the fencing area would be removed. A permanent 8-foot-tall security fence would be installed around the perimeter of each the collector substation, high-voltage substation, O&M facility, and permanent meteorological tower locations. In addition, permanent fencing surrounding the 500 kV switchyard would be in accordance with San Diego Gas & Electric requirements. With these security measures in place, Project components are not anticipated to pose a substantial threat of danger to the local population, and are not expected to generate a significant number of police response calls. Additionally, operation of the Project would not introduce a new land use commonly associated with the need for police- or emergency-related calls, such as residential or commercial uses. Therefore, construction, operation, and decommissioning activities as a result of the Project are not anticipated to generate a need for new or expanded police services or facilities.

During construction, the Project would employ approximately 684 workers, with a daily maximum of 561 workers at the peak of construction and an average daily peak of 202 workers. Approximately 50 daily truck deliveries are estimated, depending on the specific stage of construction. It is not expected that these temporary construction workers would relocate to the area with their families, and they are not expected to induce substantial population growth in the Mountain Empire or Boulevard areas. It is anticipated that workers from San Diego to the west and Imperial Valley to the east would construct the Project. This temporary increase of workers in the area during construction, and a permanent increase of 10 to 12 employees during the operational phase, is not expected to substantially increase the number of police protection service calls such that new or expanded police facilities or staff would be required to maintain acceptable service ratios and response times. Currently, the County Sheriff's Department meets its response time goals and serves a population of more than 2,000 permanent residents (San Diego County Sheriff's Department 2018b). Because the permanent increase in population as a result of the Project is not considered substantial, and because the County Sheriff's Department is currently meeting response time goals, the impact on police protection services and associated facilities would be minimal, and the potential negative impacts of the Project such as increased response to wildfire, job injuries, and theft are not considered substantial.

The Project would not result in the need for additional police protection services or expanded facilities that might result in physical environmental impacts. Therefore, impacts related to police protection would be **less than significant**.

Boulder Brush Facilities

With security measures such as fencing in place (as discussed above), the Boulder Brush Facilities are not anticipated to pose a substantial threat of danger to the local population, and are not expected to generate a significant number of police response calls. Additionally, operations of the Boulder Brush Facilities would not introduce a new land use commonly associated with the need for police- or emergency-related calls. It is not expected that construction workers would relocate to the area with their families during the construction period. Therefore, construction, operation, and decommissioning of the Boulder Brush Facilities is not anticipated to generate a need for new or expanded police services or facilities.

The Boulder Brush Facilities would not result in the need for additional police protection services or expanded facilities that might result in physical environmental impacts. Therefore, impacts would be **less than significant**.

Campo Wind Facilities

The BIA has jurisdiction over the Campo Wind Facilities, and has prepared an EIS to evaluate Project effects under NEPA (BIA 2019). The EIS analysis found that the Campo Wind Facilities would not result in a significant increased demand on police services on the Reservation. Additionally, security at the Campo Wind Facilities would include patrols, fencing, and lighting. Therefore, the Campo Wind Facilities would not result in a substantial increase in need of the County Sheriff's department or Tribal security forces, and, thus, would have no adverse impacts on police resources.

The Campo Wind Facilities is not anticipated to pose a substantial threat of danger to the local population, and is not expected to generate a significant number of police response calls. Additionally, operation of the Campo Wind Facilities would not introduce a new land use commonly associated with the need for police- or emergency-related calls, such as residential or commercial uses. Therefore, construction, operation, and decommissioning of the Campo Wind Facilities are not anticipated to generate a need for new or expanded police services or facilities.

It is not expected that construction workers would relocate to the area due to the temporary 14-month construction period, and, therefore, would not induce substantial population growth. This temporary increase of workers in the area during construction and the permanent increase of 10 to 12 employees during the operational phase is not expected to substantially increase the number of police protection service calls such that new or expanded police facilities or staff would be required to maintain acceptable service ratios and response times.

The Campo Wind Facilities would not result in the need for additional police protection services or expanded facilities that might result in physical environmental impacts. Therefore, impacts would be **less than significant**.

Schools

Project

The demand for new or expanded school facilities and services is determined by permanent increases to the local population. Implementation of the Project would not directly cause an increase in residential population or a substantial increase in workforce population that would require new or expanded schools. Although the Project would result in a temporary increase of up to 561 workers per day during peak construction activities, due to the temporary 14-month period of construction, workers are not anticipated to temporarily relocate their families to the area and enroll their children in area schools. The Project proposes 10 to 12 on-site operational workers for the O&M facility on the Reservation. This number of permanent workers is not considered a substantial increase in population growth, and would not require the construction of a new school facility or expansion of existing school facilities. Therefore, no new school facilities would need to be constructed that might result in physical environmental impacts as a result of implementation of the Project. Therefore, impacts would be **less than significant**.

Boulder Brush Facilities

Implementation of the Boulder Brush Facilities would not directly cause an increase in residential population. Construction workers are not anticipated to temporarily relocate their families to the area or enroll their children in area schools. No operational workforce is proposed for the Boulder Brush Facilities, and thus, would not result in an increase in population growth and would not require the construction of new school facilities. Therefore, no new school facilities would need to be constructed that might result in physical environmental impacts as a result of implementation of the Boulder Brush Facilities. Therefore, impacts would be **less than significant**.

Campo Wind Facilities

The BIA has jurisdiction over the Campo Wind Facilities and has prepared an EIS to evaluate Project effects under NEPA (BIA 2019). The EIS analysis found that the Campo Wind Facilities would result in 10 to 12 full-time workers, which would not result in significant increased demand on educational resources or programs on or off the Reservation. Therefore, the Campo Wind Facilities would not result in a substantial increase in enrollment that would exceed the capacity of local schools or educational programs, and, thus, the Campo Wind Facilities would have no adverse impacts on school resources.

Implementation of the Campo Wind Facilities would not directly cause an increase in residential population or a substantial increase in workforce population that would require new or expanded schools. Temporary construction workers are not anticipated to relocate their families to the area or enroll their children in area schools, since construction would only last 14 months. As discussed above, 10 to 12 permanent workers is not considered a substantial increase in population, and those workers would not require the construction of a new school facility or expansion of existing school facilities. Therefore, no new or expanded school facilities would need to be constructed that might result in physical environmental impacts as a result of implementation of the Campo Wind Facilities. Therefore, impacts would be **less than significant**.

Other Public Services

Project

Other public services would include library services. During construction and decommissioning, the Project would result in a temporary increase of up to 561 workers per day during peak construction activities. During operations there would be a permanent increase of 10 to 12 workers at the O&M facility, which is not considered a substantial increase in workforce population. The temporary workers needed during construction activities are not expected to relocate their families to the area. The increase in permanent workers to the area is not substantial and is not expected to cause an increase in demand for other public services or facilities. No new public service facilities would need to be constructed that might result in physical environmental impacts as a result of implementation of the Project. Therefore, impacts would be **less than significant**.

Boulder Brush Facilities

The increase in temporary workers to the area is not expected to cause an indirect increase in demand for other public services or facilities. No new public service facilities would need to be constructed that might result in physical environmental impacts as a result of implementation of the Boulder Brush Facilities. Therefore, impacts would be **less than significant**.

Campo Wind Facilities

The BIA has jurisdiction over the Campo Wind Facilities and has prepared an EIS to evaluate impacts under NEPA (BIA 2019). The EIS analysis found that the Campo Wind Facilities would not result in significant increased demand on other public facilities. The analysis and conclusions contained in the EIS are incorporated by reference in this analysis.

The temporary workers needed during construction activities are not expected to relocate their families to the area. Additionally, the permanent increase in workers to the area as a result of the O&M facility on the Reservation would not be substantial and is not expected to result in an increase in demand for

other public services or facilities. No new public service facilities would need to be constructed that might result in physical environmental impacts as a result of implementation of the Campo Wind Facilities. Therefore, impacts would be **less than significant**.

3.1.8.4 Cumulative Impact Analysis

The geographic extent for the analysis of cumulative impacts associated with public services consists of the service area for each public service provider that would serve the Project. Generally speaking, the cumulative study area for public services encompasses southeastern San Diego County, since public services in the area have overlapping jurisdictions and would provide services for the Project and adjacent projects. The cumulative impact analysis for public services was conducted using the projects listed in Table 1-4, Cumulative – Reasonably Foreseeable, Approved, and Pending Projects (refer to Chapter 1 of this EIR).

For fire protection and emergency medical response, the cumulative study area would encompass the area under the jurisdiction of the SDCFA, and specifically the area within which Boulevard Fire Station 47 is responsible for responding. This service area determines the boundary for the cumulative analysis because SDCFA would respond to calls from the Project Site, in addition to existing or future calls within its service area, which could potentially result in cumulative impacts.

For police protection, the cumulative study area would encompass all of the area serviced by the County Sheriff's Boulevard office, which is approximately 200 square miles and includes the communities of Boulevard and Jacumba. Similar to fire protection and emergency response, the service area for the Boulevard Sheriff's station determines the boundary for the cumulative analysis regarding police protection, because this station would be the one to respond to a call from the Project Site, in addition to existing or future calls within its service area, which could potentially result in cumulative impacts.

Past development and population growth within southeastern San Diego has impacted the provision of public services and facilities. As the area becomes increasingly developed and the permanent population grows, increased demand is placed on the existing public service system, which can become overwhelmed. As discussed above, southeastern San Diego consists of several small, rural communities spread out over a wide geographic area that are generally served by local volunteer and state fire departments and County law enforcement agencies.

Fire Protection

The list of cumulative projects includes several other renewable energy projects and transmission projects that would contribute to incremental but small increases in residential or workforce population growth in the area, similar to the Project. None of these projects, including the Project, include any components that would cause a substantial permanent or temporary increase in

population. However, these projects would contribute to an increased need for fire protection services in the area due to the increase of human activity, ignition sources (such as electrical equipment), and combustible fuel in the area.

As discussed in Section 2.9 and the FPP prepared for the Boulder Brush Facilities (Appendix I), the projects located within the jurisdiction of the SDCFA, and specifically within the service area for Boulevard Fire Station 47, are also subject to the County Consolidated Fire Code and County fire regulations. This includes the preparation and adherence to a Fire Service Developer Agreement with the County, which would ensure that projects pay fair-share funding toward fire services. Funding provided by all cumulative projects would result in capital that could be used toward future firefighting and emergency response augments, improvements, and additions so that SDCFA and area firefighting agencies are able to perform their mission into the future at levels consistent with the General Plan. All new, approved, or reasonably foreseeable cumulative projects within the jurisdiction of the SDCFA would be required to pay fair-share funding toward fire services by entering into a Fire Services Developer Agreement. Therefore, fire protection impacts **would not be cumulatively considerable**.

Police Protection

The list of cumulative projects includes several other renewable energy projects and transmission projects that would contribute to incremental increases in population growth and temporary workforce in the area, similar to the Project. However, the cumulative projects would result in minimal demand for police protection services in the area, similar to the Project, and would not be considered cumulatively significant. Cumulative projects, including the other renewable energy and transmission projects, would not contribute substantially to cumulative impacts on police protection services, since these projects, similar to the Project, would not include permanent or temporary components that would cause substantial permanent or temporary increases in population.

Construction and decommissioning (where applicable) of the cumulative projects would be temporary. Of the employees required during construction and decommissioning of the Project, few are expected to temporarily relocate families to the area. Therefore, the temporary increase in population resulting from construction and decommissioning of the Project is not expected to substantially increase police service calls or require the construction of new or expanded facilities to maintain acceptable service ratios and response times. Construction of some of the cumulative projects, such as the other renewable energy development projects, could potentially overlap with the Project during certain phases. However, demands placed on local police services would be short term and intermittent, and would not require the construction of new or expansion of existing facilities.

Once operational, the Project would require a workforce population of 10 to 12 personnel, which is not considered a substantial growth in workforce population. The Project is not substantially growth-inducing regarding residential or workforce population increase, and would not necessitate the need for increased police protection facilities. Thus, the Project's contribution to police protection **would not be cumulatively considerable**.

Schools

The Project would not include a residential component or directly result in an increase in school-age children in the area and, therefore, would not directly impact schools. Construction schedules of cumulative projects, such as the other renewable energy development projects shown in Table 1-4 (in Chapter 1), could potentially overlap with the Project during certain phases. However, temporary construction workers are not expected to relocate their families to the area, and the operational on-site workforce population of 10 to 12 personnel is not considered a significant increase in population; therefore, the Project would not cause substantial increases in demand for schools in the area.

Once operational, the Project would require a minimal amount of workforce population and would not induce significant population growth. Therefore, the Project's indirect impacts would not result in the need for new or expanded school facilities during construction, operation, or decommissioning, and impacts **would not be cumulatively considerable**.

Other Public Services

During construction and operation of the Project, the local daily population would temporarily increase by up to a maximum of 561 workers during peak construction activities. The potential temporary increase in population in the area would be served by existing libraries, as described in Section 3.1.8.1, Existing Conditions.

Impacts to library services are considered when a project adds permanent residential population to an area. Library services in the area would not be directly impacted by the Project, since the Project would not induce significant residential population growth. Therefore, the Project's impacts relating to the expansion of existing or addition of new other public services **would not be cumulatively considerable**.

3.1.8.5 Significance of Impacts Prior to Mitigation

Project

The Project would not result in significant impacts related to fire services, police services, schools, or other public services. Therefore, impacts would be **less than significant**.

Boulder Brush Facilities

Impacts related to fire services, police services, schools, and other public services on private land would be **less than significant**.

Campo Wind Facilities

Impacts related to fire services, police services, schools, and other public services on the Reservation would be **less than significant**.

3.1.8.6 Conclusion

Fire Protection

Project

Although the local population would temporarily increase daily workers up to a maximum of 561 workers during peak construction activities, this increase is not expected to substantially increase the number of fire or emergency response service calls or require new or expanded fire facilities, as described in Section 3.1.8.3, Analysis of Project Impacts and Determination of Significance. Furthermore, the additional 10 to 12 workers for the O&M facility during the operational phase of the Project would not induce substantial population growth that would require new or expanded fire facilities. Therefore, Project impacts on fire protection services would be **less than significant**.

Boulder Brush Facilities

Construction and operation of the Project is not expected to substantially increase the number of fire or emergency response service calls or require new or expanded fire facilities. Therefore, impacts as a result of the Boulder Brush Facilities would be **less than significant**.

Campo Wind Facilities

Construction and operation of the Project is not expected to substantially increase the number of fire or emergency response service calls or require new or expanded fire facilities. Therefore, impacts as a result of the Campo Wind Facilities would be **less than significant**.

Police Protection

Project

Although the local population would temporarily increase daily workers up to a maximum of 561 workers during peak construction activities, this increase is not expected to substantially increase the

number of police protection service calls or require new or expanded police facilities, as described in Section 3.1.8.3. Furthermore, the additional 10 to 12 workers for the O&M facility during the operational phase of the Project would not induce substantial population growth to significantly impact police protection services or require the construction of new police protection facilities. Therefore, Project impacts on police protection services would be **less than significant**.

Boulder Brush Facilities

Construction and operation of the Project is not expected to substantially increase the number of police protection service calls or require new or expanded police facilities. Therefore, impacts as a result of the Boulder Brush Facilities would be **less than significant**.

Campo Wind Facilities

Construction and operation of the Project is not expected to substantially increase the number of police protection service calls or require new or expanded police facilities. Therefore, impacts as a result of the Campo Wind Facilities would be **less than significant**.

Schools

Project

The Project would not induce a significant temporary or permanent increase in population that would require new or expanded schools. Impacts of the Project would not result in the need for new school facilities or expansions of existing school facilities. Therefore, impacts would be **less than significant**.

Boulder Brush Facilities

Impacts as a result of the Project would not result in the need for new school facilities or expansion of existing school facilities. Therefore, impacts associated with the Boulder Brush Facilities would be **less than significant**.

Campo Wind Facilities

Impacts as a result of the Project would not result in the need for new school facilities or expansion of existing school facilities; therefore, impacts associated with the Campo Wind Facilities would be **less than significant**.

Other Public Services

Project

The increase in temporary construction workers and permanent O&M facility employees would not be substantial and is not expected to cause an indirect increase in demand for other public services, including library services. The Project would not result in the need for new or expanded other public services or facilities, and impacts would be **less than significant**.

Boulder Brush Facilities

Impacts as a result of the Project would not result in the need for new or expanded other public services or facilities. Therefore, impacts as a result of the Boulder Brush Facilities would be **less than significant**.

Campo Wind Facilities

Impacts as a result of the Project would not result in the need for new or expanded other public services or facilities. Therefore, impacts as a result of the Campo Wind Facilities would be **less than significant**.

**Table 3.1.8-1
Primary Study Area Fire Resources**

Station	Location	Distance to Project	Staffing	Apparatus
Campo Reservation Fire Protection Department	36210 Church Road, Campo	Located within the Reservation Boundary	13 personnel, including a Fire Chief, an Operations Chief, a Prevention Chief, a District Clerk, and nine fire suppression personnel ^a	Engines: one Type I, one Type III; one aerial ladder truck
CAL FIRE McCain Valley Prison Camp	2550 McCain Valley Road, Boulevard	Approximately 2.6 miles east/southeast of the Project Site	Crew levels at this camp fluctuate, and the response is typically for wildland fire, flood control, and community projects	Two emergency crew transport vehicles
SDCFA Boulevard Fire Station 47 ^b	40080 Ribbonwood Road, Boulevard	Approximately 3.7 miles east/southeast of the Project Site	Three full-time firefighters (CAL FIRE) and volunteers (varies); staff varies with a combination of CAL FIRE career fire fighters and SDCFA reserve fire fighters	Engines: one Type I, one Type III; one Type VI; one water tender
CAL FIRE Campo Fire Station 40 ^b	31577 Highway 94, Campo	Approximately 4.7 miles west/southwest of the Project Site	Varies	Two engines and one pickup truck

Sources:

^a CRFPD 2019.

^b SDCFA 2019.

CAL FIRE = California Department of Forestry and Fire Protection; SDCFA = San Diego County Fire Authority

**Table 3.1.8-2
Project Area Police Protection**

Station	Location	Distance to Project	Staffing
Boulevard/Jacumba Sheriff's Office	39919 Highway 94, Boulevard	Approximately 1.9 miles east/southeast of the Project Site	Approximately two Sheriff deputies working 12-hour shifts
Campo Sheriff's Office Substation	378 Sheridan Road, Campo	Approximately 4.4 miles west of the southwest corner of the Reservation	Varies – The area is patrolled by the Sheriff's Department with services including law enforcement, off-road enforcement, crime prevention, community advisory group, and senior volunteer patrol ^a
Boulevard U.S. Customs and Border Protection Station	39701 Avenida de Robles Verdes, Boulevard	Approximately 1.5 miles east/southeast of the Project Site	Varies
Campo U.S. Customs and Border Protection Station	32355 Old Highway 80, Pine Valley	Approximately 5.1 miles west of the Project Site	Varies – Agents at the Campo Station perform numerous Border Patrol duties, including enforcement operations on the border, anti-smuggling operations, intelligence gathering, and prosecution of criminal aliens and criminal alien removal programs ^b

Sources:

^a San Diego County Sheriff's Department n.d.

^b CBP 2014.