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Project Title:	Soda Mountain Solar
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Document Title:	Section 3-15 Public Services
Description:	This Section evaluates the direct, indirect and cumulative impacts the Project may have on public services and identifies any required Applicant-Proposed Measures (APM) and any required Mitigation Measures.
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3.15 PUBLIC SERVICES

This section describes the existing public services generally available in the vicinity of the project site and evaluates the environmental impacts to public services that may result directly or indirectly from the proposed project. The analysis in this section describes the applicable regulations, presents an overview of existing conditions, identifies the criteria used for determining the significance of environmental impacts, and lists applicant-proposed measures (APMs) that would be incorporated into the project to avoid or substantially lessen potentially significant impacts to the extent feasible. The analysis is based on a review of existing resources, technical data, and applicable laws, regulations, plans, and policies.

3.15.1 Regulatory Setting

3.15.1.1 Federal

DESERT RENEWABLE ENERGY CONSERVATION PLAN

In September 2016, the Bureau of Land Management (BLM) adopted the Desert Renewable Energy Conservation Plan (DRECP) Land Use Plan Amendment (LUPA) to the California Desert Conservation Area (CDCA) Plan, Bishop Resource Management Plan, and Bakersfield Resource Management Plan. The DRECP LUPA addresses solar, wind, geothermal energy generation, and transmission projects on 10.8 million acres of BLM-administered lands in the desert regions of southern California (BLM 2016).

The BLM DRECP LUPA establishes several land use classifications, including Development Focus Areas (DFAs), Variance Process Lands (VPLs), Recreation Management Areas, General Public Lands, and various conservation land use designations. In DFAs, renewable energy projects are incentivized and permitting is streamlined. Renewable energy projects may be implemented on VPLs, but they must first be evaluated under a variance process and then approved by the BLM to proceed through National Environmental Policy Act (NEPA) environmental review. BLM Conservation Areas include National Landscape Conservation System lands, Areas of Critical Environmental Concern (ACECs), and Wildlife Allocations. Recreation Management Areas are designated for recreation actions. This designation includes Extensive Recreation Management Areas, which entail management specifically to address recreation use and demand; and Special Recreation Management Areas, which are high-priority areas for recreation and have unique value and importance for recreation. General Public Lands are BLM-administered lands that do not have a specific land allocation or designation associated with energy development, conservation, or recreation. These lands are not needed to fulfill the DRECP biological conservation or renewable energy strategy. These areas are available to renewable energy applications but do not benefit from permit review streamlining or other incentives.

The majority of the project site is located on DRECP General Public Lands, and the gen-tie route is within an ACEC.

FEDERAL LAND POLICY & MANAGEMENT ACT OF 1976

The Federal Land Policy and Management Act of 1976, as amended, established public policy and guidelines for the BLM's multiple-use and sustained yield mandate to serve present and future generations.

The Federal Land Policy and Management Act specifically gives BLM law enforcement officers traditional police powers such as enforcing federal laws, carrying firearms, serving search warrants,

making arrests with or without a warrant, and conducting searches of places or people with or without a warrant in accordance with applicable laws and seizing evidence. BLM law enforcement officers enforce federal laws and do not have authority to enforce state laws without written authorization from a sheriff, other authorized state official or state law.

3.15.1.2 State

CALIFORNIA HEALTH AND SAFETY CODE

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

CALIFORNIA FIRE CODE

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

CALIFORNIA EDUCATION CODE

Maximum class sizes and penalties for districts that exceed the limits are outlined in the California Department of Education's California Education Code Sections 41376 and 41378:

- Kindergarten: Average class size not to exceed 31 students, with no class larger than 33 students.
- Grades 1 through 3: Average class size not to exceed 30 students, with no class larger than 32 students.
- Grades 4 through 8: In the current fiscal year, the average number of students per teacher not to exceed the greater of 29.9 (the statewide average number of students per teacher in 1964) or the district's average number of students per teacher in 1964.

CALIFORNIA FIRE PLAN

The 2018 Strategic California Fire Plan directs each California Department of Forestry and Fire Protection (CAL FIRE) unit to prepare a locally specific Fire Management Plan (CAL FIRE 2019). These documents assess the fire situation within each of CAL FIRE's 21 units and six contract counties and include stakeholder contributions and priorities, as well as identify strategic areas for pre-fire planning and fuels treatment. The unit plans are required to be updated annually with the Strategic California Fire Plan update in 2024.

While the project falls within the 2023/2024 Strategic Fire Plan for the San Bernardino Unit, the site is wholly on federal land, there are multiple regional, state, and local agreements and operating plans currently in use that provide for mutual aid between and among federal, state, and local fire agencies (CAL FIRE 2023). These mutual aid systems exist to ensure that adequate resources, facilities, and other supports are provided to jurisdictions whenever resources prove to be inadequate for a given incident.

3.15.1.3 Local

SAN BERNARDINO COUNTYWIDE PLAN

The Countywide Plan, adopted by the Board of Supervisors in 2020, encompasses Bernardino County's General Plan. The Countywide Plan contains 11 elements within the Policy Plan, the County Business Plan, and 35 Community Action Guides. The following policies applicable to the proposed project are quoted directly from the Countywide Plan (San Bernardino County 2024).

Land Use Element

The following policies are applicable to the proposed project:

- **Policy LU-1.2 Infill development.** We prefer new development to take place on existing vacant and underutilized lots where public services and infrastructure are available.
- **Policy LU-1.3 Fiscal sustainability.** When determining fiscal impacts, we consider initial capital investments, long-term operations and maintenance, desired levels of service for public facilities and services, capital reserves for replacement, and impacts to existing uses in incorporated and unincorporated areas.

Housing Element

The following policies are applicable to the proposed project:

- **Policy H-3.1. Public Services, amenities, and safety.** We support the provision of adequate and fiscally sustainable public services, infrastructure, open space, non-motorized transportation routes, and public safety for neighborhoods in the unincorporated area.

Natural Resources

The following policies are applicable to the proposed project:

- **Policy NR-3.9 Local parks, trails, and recreation.** We support the provision of local and community parks, trails, and recreational programs and facilities in unincorporated areas when a locally-approved funding and financing mechanism is established to pay for acquisition, construction, maintenance, and operations. We encourage unincorporated communities to apply for funding and cooperate with them in their funding applications for local trails that are identified in a non-motorized transportation plan that is accepted or adopted by the County. We also encourage, where feasible, local trails to be separated from vehicular traffic to improve the safety of trail users.

Safety Element

The following policies are applicable to the proposed project:

- **Policy PP-1.1 Law enforcement services.** The Sheriff's Department provides law enforcement services for unincorporated areas and distributes resources geographically while balancing levels of service and financial resources with continuously changing needs for personal and property protection.
- **Policy PP1.9 Periodic needs assessment.** The Sheriff's Department periodically assesses their facility, equipment, and staffing needs and use the assessment to allocate funding resources in the annual budget and capital improvement program.

- **Policy PP-3.1. Fire and emergency medical services.** We maintain a sufficient number and distribution of fire stations, up-to-date equipment, and fully-trained staff to respond effectively to emergencies.
- **Policy PP-3.3 Search and rescue.** We maintain up-to-date equipment and fully-trained staff to provide urban search and rescue and swift water rescue emergency response.
- **Policy PP-3.6 Concurrent protection services.** We require that fire department facilities, equipment, and staffing required to serve new development are operating prior to, or in conjunction with new development.
- **Policy PP-3.13 Period needs assessment.** We periodically assess our facility, equipment, and staffing needs and use the assessment to allocate funding resources in the annual budget and capital improvement program.

Health and Wellness Element

The following policies are applicable to the proposed project:

- **Policy HW-1.5 Partnerships and capacity building.** We leverage partnerships with other agencies and organizations to address health and wellness issues, and, as funding allows, assist in building the capacity of service providers and partner organizations to expand their service and effectiveness.
- **Policy HW-3.3 Public libraries.** We operate public libraries in unincorporated areas and contract cities/towns to provide programs and facilities that ensure equitable access to information and digital technology, provide places and activities for people to connect with other people, promote literacy and reading for pleasure for children and adults, and foster a culture of creativity, innovation, and collaboration. We invest in the modernization and expansion of public library facilities as adequate funding is available.
- **Policy HW-3.6 Multi-use facilities and integrated development.** We encourage those who build and/or operate community assets to accommodate multiple functions and programs. We encourage the development of new residential, commercial, and institutional uses and public facilities that incorporate one or more community assets.

3.15.2 Environmental Setting

3.15.2.1 Fire Protection

Fire protection services serving the project site are under the jurisdiction of the San Bernardino County Fire Protection District (SBCoFD). The SBCoFD has 50 active fire stations and over 1,000 employees. The department serves more than 60 communities/cities and all unincorporated areas of the County. From 2021 to 2022, the SBCoFD responded to over 130,000 calls for service (SBCoFD 2023a). The project site is located within Division 5 (North Desert), which consists of 10 fully staffed fire stations and three on-call fire stations (SBCoFD 2023b). Station No. 53 is the nearest station to the project site and is located at 72734 Baker Boulevard in Baker, approximately 13 miles from the Rasor Road access point to the project site (SBCoFD 2023b). The second closest station is Station No. 52, located in Newberry Springs on Interstate 15, approximately 30 miles southwest of the project site.

The SBCoFD does not currently have established performance standards; however, the San Bernardino Countywide Plan contains policies and programs related to fire protection services calling for the adoption of a Countywide Fire Protection Master Plan that would use National Fire Protection

Association (NFPA) Standards 1710 and 1720 as goals for creation of standards of cover (San Bernardino County 2016). For locations within 8 miles of a station (e.g., the North Array via the Blue Bell Mine Road access point), these standards call for a response time of fewer than 14 minutes for the arrival of the first company to 90% of incidents and a minimum of six personnel. For locations further than 8 miles from a station (e.g., the South and East arrays via the Razor Road access point), the standards do not specify a response time.

3.15.2.2 Law Enforcement

The project site is located within the service area of the San Bernardino County Sheriff's Department (SBCSD). The SBCSD has a staff of approximately 4,200 and has eight County and 14 contract patrol stations located throughout the County. The department's dispatch center takes in approximately 965,959 calls for service annually. The nearest sheriff's office to the project site is the Barstow Station located at 225 East Mountain View Road in Barstow, approximately 50 miles southwest of the site (SBCSD 2023). The SBCSD Barstow Station patrols an area of 9,200 square miles and serves a population of over 23,000. In 2022, the station employed 25 patrol deputies and had 21,594 calls for service (SBCSD 2022). A satellite substation to the Barstow Station is located in Baker, approximately 7 miles to the northeast of the project site. The Baker Substation is known as a "resident post" as deputies assigned to this substation live in housing provided by the County. Deputies serving the Barstow/Trona area also work regularly with the California Highway Patrol and BLM law enforcement rangers (SBCSD 2023).

Traffic collision investigations within unincorporated areas of the County are handled by the California Highway Patrol.

3.15.2.3 Schools

The project site is located within the Baker Valley Unified School District. The district operates three schools: elementary, junior high, and high school, all of which are located in Baker. There were a total of 124 students enrolled in the district during the 2022–2023 academic year (California Department of Education 2023a). Construction workers with school-age children also may reside in Barstow, which is served by the Barstow Unified School District. The district serves more than 6,300 students and operates 13 schools in the Barstow area (California Department of Education 2023b).

3.15.2.4 Other Public Facilities

The nearest hospital with an emergency room to the project site is Barstow Community Hospital located at 820 East Mountain View Street in Barstow. The Barstow Branch of the San Bernardino County Library is located at 304 East Buena Vista Street in Barstow.

3.15.3 Impact Analysis

3.15.3.1 Thresholds of Significance

The determinations of significance of project impacts are based on applicable policies, regulations, goals, and guidelines defined by the California Environmental Quality Act (CEQA) Guidelines, Appendix G. Specifically, the project would be considered to have a significant effect on public services if the effects exceed the significance criteria described below:

1. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the

construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- i. Fire protection
- ii. Police protection
- iii. Schools
- iv. Other public facilities.

Each of these thresholds is discussed under Section 3.15.3.2, Impact Assessment, below.

3.15.3.2 Impact Assessment

Impact PS-1: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services (Less than Significant):

i. Fire protection

Although it is not anticipated that the proposed project will increase the demand for fire protection services, the likelihood of a construction accident or emergency incident that would require fire protection services would increase during the construction portion of the project. This is due to increased activity at the project site (approximately 300 workers during peak construction activities), higher amounts of fuel on-site, and a greater number of ignition sources on-site. Throughout the project's construction phase, appropriate fire safety measures will be used to reduce the risk of an emergency, such as clearing, grubbing, and installing water tanks.

Operation and maintenance of the project would have the potential to introduce potential ignition sources such as transformers, capacitors, electric transmission lines (including the gen-tie line), substations, maintenance vehicles, and gas- or electric-powered machinery used for maintenance of the facilities. Additionally, the proposed inverters and solar panels may represent a potential ignition source. However, the potential for fire risk for these components is considered to be low. Fire management zones would be maintained around all structures and access roads. The battery energy storage system (BESS) would follow all applicable building and fire codes, including the NFPA's new Standard for Installation of Energy Storage Systems (NFPA 855). All battery components for the proposed energy storage component would be installed on concrete pads and contained within an enclosure to minimize the potential for sparks or ignition to occur. Further, all such enclosures would be equipped with a fire suppression system and heating, ventilation, and air conditioning (HVAC) system. The fire suppression system would include a fire detection and suppression control system that would be triggered automatically when the system senses imminent fire danger. If necessary, the safety system would use either a waterless evaporating fluid, a sustainable clean agent (not a hydrofluorocarbon clean agent), or an alternative suppression agent, such as an inert gas. Additionally, an approximately 22,500-gallon tank would be located near the operation and maintenance building to provide storage of fire suppression water. The tank would meet the minimum requirements for fire suppression water supply as stated in NFPA Standards 1142 and 13.

If the proposed project were to increase the demand for fire protection services, the existing fire resources in the area will be able to support these needs. Fire emergencies that may occur at the project site would be primarily responded to by Station 53 in Baker, approximately 13 miles from the Razor Road access point to the project site. Additional response would be available from Station 52 in Newberry Springs, approximately 30 miles southwest of the project site. Other fire protection services are available from mutual aid resources from throughout San Bernardino County and the state, when necessary. For these reasons, the impacts to fire protection services for the proposed project would be **less than significant**.

ii. Police protection

The project would implement security measures on the project site, such as installing fencing, signage, lighting, and security cameras. Security fencing would be installed surrounding each individual array field and extend to include the substation and BESS area. The fencing would meet National Electrical Safety Code requirements for protective arrangements in electric supply stations. Fencing would be up to 9 feet in height total, with an 8-foot-high chain-link perimeter fence and 1 foot of three strands of barbed wire along the top. The line posts and terminal posts of the fence would be buried up to 3.5 feet deep, and the distance between posts would not exceed 10 feet.

Lighting would be provided at the Razor Road site entrance, operation and maintenance building, substation, and switchyard. Exterior security lighting would be installed to provide safe access to project facilities as well as visual surveillance. Some portable lighting also could be required for essential nighttime maintenance activities. All lighting would be kept to the minimum required for safety and security; sensors, motion detectors, and switches would be used to keep lighting turned off when not required. All lights would be downward, shielded, and directed so as to minimize light exposure and comply with San Bernardino County's Light Trespass Ordinance, Chapter 83.07 of the San Bernardino County Code of Ordinances.

With these security measures implemented, the proposed project is not anticipated to pose a substantial danger to the local population and is not expected to generate a significant number of police response calls.

Construction of the project could increase the local population by up to 300 workers during peak construction activities. The majority of construction and operational employees are anticipated to reside locally or regionally, which would not create a new demand on police services. It is not anticipated that any workers who relocate to the area would 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.

Overall, the proposed project would not result in the need for additional police protective services or facilities, and therefore the impacts are **less than significant**.

iii. Schools

The proposed project does not include residential uses and would not result in a substantial permanent increase to the local population, thus potentially increasing the demand on the areas school systems. Although the proposed project could temporarily increase the local population by up to 300 workers during peak construction activities, it is not anticipated that these workers would permanently relocate their families to the area due to the temporary nature of this work.

Once construction is complete, the proposed project would not have any full-time personnel on-site, and the occasional operations and maintenance workers are not anticipated to relocate near the project site. For these reasons, impacts resulting from new school facilities or expansions of existing school facilities are considered **less than significant**.

v. Other public facilities?

Construction of the proposed project may temporarily increase the local population by up to 300 workers during peak construction activities. Although these workers could visit local healthcare facilities or libraries, any increase would be temporary and not result in the need for new or expanded facilities or services. Therefore, the impacts to other public services would be **less than significant**.

3.15.4 Mitigation Measures

No mitigation is required.

3.15.5 Cumulative Impacts

Impact C-PS-1: Would the impacts of the proposed project, in combination with other past, present, and reasonably foreseeable future projects, contribute to a cumulative impact related to public services? (Less than Significant)

The proposed project and cumulative projects do not include a residential component and would not result in a significant population increase. Any temporary increases in workforce populations that the proposed project and cumulative projects would cause would be small enough that the existing fire protection, police protection, public school system, and other public services could support the additional demand and new or expanded infrastructure would not be required. For these reasons, the proposed project in combination with cumulative projects would result in **less-than-significant** cumulative impacts to public services.

3.15.6 References Cited

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