

4.14 PUBLIC SERVICES

4.14.1 Existing Conditions

4.14.1.1 Fire Protection

There are six fire protection districts (FPD) within the boundaries of the County, including the Big Pine FPD, Bishop FPD, Independence FPD, Lone Pine FPD, Olancho Volunteer Fire Department, and Southern Inyo FPD (Inyo County 2001, as amended). The six FPDs have 127 active volunteers, but up to 170 are needed to effectively respond to the number of calls received (Inyo County Volunteer Firefighters 2014).

The FPDs respond to structure fires, wildland fires, medical emergencies, hazardous materials spills, and other emergencies (Inyo County Volunteer Firefighters 2014).

Additional fire protection services within the County include services provided by state and federal land management agencies on lands they manage. These agencies include CAL FIRE, NPS, USFS, and the BLM. These agencies also provide fire protection to areas outside of managed lands through cooperative fire protection agreements. Much of the County is located within FRAs, with LRAs scattered throughout the County. SRAs occur within the Owens Valley and the US 395 corridor. Refer to Section 4.8 for a summary of fire hazard ratings and responsibility designations for each of the SEDAs and the OVSA, and Figure 4.8-1 for the Fire Hazard Severity Zones in SRAs. The San Bernardino Unit of CAL FIRE operates two fire stations within Inyo County. One station is located in Bishop and one is located in Independence (CAL FIRE 2014).

4.14.1.2 Police Protection

Inyo County Sheriff's Department

Police protection services within Inyo County are provided by the Inyo County Sheriff's Department. The department headquarters are located in Independence with additional posts in Bishop, Lone Pine, Shoshone and Death Valley. The sheriff's department has special units including boat patrol, off-highway vehicle detail, and mounted patrol (ICSD 2014).

California Highway Patrol

The California Highway Patrol (CHP) is a statewide organization with responsibility for law enforcement for state highways and roads. Primary responsibilities of the CHP include traffic safety, service to the motoring public, and protection of state property. CHP services include law enforcement, traffic control, accident investigation, and the management of hazardous materials spill incidents. Inyo County is located within the Inland Division of the CHP. According to the CHP, the Inland Division faces the widest spectrum of traffic enforcement challenges, due to the large patrol area (CHP 2014). The Inland Division operates two fixed-wing aircraft and two helicopters. There is one CHP area office located within Inyo County. It is located at 469 South Main Street in Bishop (CHP 2014).

4.14.1.3 Schools

There are six school districts within Inyo County, including Big Pine Unified School District (USD), Bishop USD, Death Valley USD, Lone Pine USD, Owens Valley USD, and Round Valley Joint Elementary School District (JESD) (Inyo County Office of Education 2014).

Table 4.14-1 summarizes the enrollment for each of the school districts.

School District	2012-2013 Enrollment (number of students)	Schools			
		Elementary	Middle/ Junior	High	Other
Big Pine USD	195	0	0	0	1 (K-12)
Bishop USD	1,945	1	1	2	4
Death Valley USD	80	3	0	0	2
Lone Pine USD	380	1*	0	1	1
Owens Valley USD	40	1	0	1	0
Round Valley JESD	138	0	0	0	1 (K-8)
Total	2,778	6	1	4	9

Source: Inyo County Office of Education Schools Directory.

Available online at: http://www.inyo.k12.ca.us/docs/10-Inyo_Schools_Directory_2012-13_10102012123527.pdf.

JESD = Joint Elementary School District

USD = Unified School District

*Lo-Inyo Elementary School includes Lo-Inyo Middle School

4.14.1.4 Parks

Inyo County maintains parks and campgrounds for use by residents and visitors (Inyo County Parks and Recreation Department 2014). Parks operated by the County Parks and Recreation Department include seven parks located in Bishop, Big Pine, Independence, and Lone Pine. Bishop parks include the Millpond Recreation Area, Izaak Walton Park, and Starlight Park. Mendenhall Park is located in Big Pine, and Spainhower Park is located in Lone Pine. Dehy Park and Independence Park are located in Independence. The County Parks and Recreation Department operates lower elevation campgrounds readily accessible from US 395, including Diaz Lake, Portagee Joe, Independence Creek, Taboose Creek, Tinnemaha Creek, Millpond, Baker Creek, Pleasant Valley, Glacier View, Brown's Town, and Tecopa Park and Campground.

4.14.1.5 Other Public Facilities

There are two hospitals located in Inyo County. Northern Inyo Hospital is located in Bishop and Southern Inyo Hospital is located in Lone Pine. Northern Inyo Hospital is a 25-bed critical access, not-for-profit hospital providing 24-hour emergency care services (Northern Inyo Hospital 2014). Southern Inyo Hospital provides general medical and surgical care for inpatient, outpatient, and emergency room patients and provides 24-hour emergency care services (Southern Inyo Healthcare District 2014). Ambulance services for Southern Inyo Hospital are provided by the Lone Pine FPD, which operates three ambulances, and the Independence FPD

that operates two ambulances; both are staffed by volunteer emergency medical technicians and Lone Pine has a volunteer paramedic. Patients who require transfers are transported via ambulance, fixed-wing plane, or helicopter to the nearest and most medically appropriate facility. Lower-acuity cases are often transferred to North Inyo Hospital in Bishop, while high-acuity cases are generally sent to Washoe Medical Center in Reno, Nevada or Loma Linda University Medical Center, in Loma Linda, California (Southern Inyo Healthcare District 2014).

4.14.1.6 Regulatory Framework

State Regulations

California Code of Regulations Title 14

Under Title 14 of the CCR, CAL FIRE has the primary responsibility for implementing wildfire planning and protection for the SRAs. CAL FIRE has responsibility for the protection of over 31 million acres of California’s privately owned wildlands, and also provides emergency services within 36 of California’s 58 counties through local government contracts (CAL FIRE 2014). CAL FIRE’s services include responding to emergencies that may occur on a daily basis, including residential or commercial structure fires, automobile accidents, heart attacks, drowning victims, lost hikers, hazardous material spills on highways, train wrecks, floods, and earthquakes.

Senate Bill 50

Senate Bill 50 (passed in 1998) sets forth a state school facilities construction program that includes restrictions on a local jurisdiction’s ability to condition a project or mitigation of a project’s impacts on school facilities in excess of fees set forth in Education Code 17620. The provisions of Senate Bill 50 allow the state to offer funding to school districts to acquire school sites, construct new school facilities, and modernize existing school facilities. Senate Bill 50 also establishes a process for determining the amount of fees developers may be charged to mitigate the impact of development on school facilities resulting from increased enrollment. Under this legislation, a school district could charge fees above the statutory cap only under specified conditions, and then only up to the amount of funds that the district would be eligible to receive from the state. This program has been found by the legislature to constitute “full and complete school facilities mitigation.”

Local Regulations

Inyo County General Plan

Land Use Element

- Policy LU-1.16: Impacts of New Development on Infrastructure Improvements, Public Facilities, and Services. The impacts of discretionary projects shall be assessed as required by CEQA and appropriate, feasible, mitigation will be required at the time such projects are approved and as provided by law. Mitigation required for such projects may include the collection of fees to offset impacts to infrastructure, public facilities, and services.

- Goal LU-5: Provide adequate public facilities and services for the existing and/or future needs of communities and their surrounding environs, and to conserve natural and managed resources.
- Goal PSU-1: To ensure the timely development of public facilities and the maintenance of adequate service levels for these facilities to meet the needs of existing and future County residents.
- Policy PSU-1.1: Facilities and Services for New Development. The County shall ensure through the development review process that public facilities and services will be developed, operational, and available to serve new development. The County shall not approve new development where existing facilities are inadequate unless the applicant can demonstrate that all necessary public facilities will be installed or adequately financed and maintained (through fees or other means).
- Policy PSU-1.2: On-Site Infrastructure. The County shall require all new development, including major modifications to existing development, to construct necessary on-site infrastructure to serve the project in accordance with County standards.
- Goal PSU-2: To ensure that adequate facility and service standards are achieved and maintained through the use of equitable funding methods.
- Policy PSU-2.2: Fair Share of Costs. The County shall require that new development pays its fair share of the cost of developing new facilities and services and upgrading existing public facilities and services. Exceptions may be made when new development generates significant public benefits (e.g., low income housing) or when alternative sources of funding can be identified to offset foregone revenues.
- Goal PSU-8: To protect the residents of and visitors to Inyo County from injury and loss of life and to protect property from fires.
- Policy PSU-8.1: Fire Protection for New Development. Prior to the approval of development projects, the County shall determine the need for fire protection services. New development in unincorporated areas of the County shall not be approved unless adequate fire protection facilities can be provided.
- Policy PSU-8.2: Education. The County shall identify key fire loss problems and design appropriate fire safety education programs to reduce fire incidents and losses.
- Goal PSU-9: To provide adequate law enforcement services to deter crime and to meet the growing demand for services associated with increasing populations and commercial/industrial development in the County.
- Policy PSU-9.1: Law Enforcement Facilities. Within the County’s overall budgetary constraints, the County shall provide law enforcement facilities (including substation space, patrol, and other vehicles, necessary equipment, and support personnel) sufficient to maintain service standards.

- Policy PSU-9.3: Law Enforcement Support. The County shall work with federal law enforcement agencies to ensure appropriate coordination and maximum use of available resources for the protection of public safety in the County.
- Goal PSU-11: To ensure that adequate school facilities are available and appropriately located to meet the needs of Inyo County residents.
- Policy PSU-11.1: Provision of Facilities. The County shall continue to support local school districts in providing quality education facilities that will accommodate projected changes in student enrollment.
- Policy PSU-11.2: Planning for New Facilities. The County shall work cooperatively with local school districts in monitoring housing, population, and school enrollment trends and in planning future school facility needs, and shall assist the districts in identifying appropriate sites for new schools in the County.
- Policy PSU-11.6: Funding. The County and school districts should work closely to secure adequate funding for new school facilities. The County shall support the school districts' efforts to obtain appropriate funding methods such as school impact fees.

Public Safety Element

- Goal WF-1: Prevent wildfires and provide public safety from wildfire hazards.
- Policy WF-1.1: Fire Protection Agencies. Support expansion of fire protection agencies and volunteer fire departments, and continue to cooperate with federal, state, local agencies and private landowners to provide greater fire protection for the County.
- Policy WF-1.2: Limitations in Fire Hazard Zones. Discourage development within high fire hazard severity zones.
- Policy WF-1.3: Fuel Modification. Require fuel modification for structures within fire hazard zones.

4.14.2 Significance Thresholds

The thresholds for determining significance under CEQA are based on Appendix G of the State CEQA Guidelines. In this analysis, the proposed project would have significant or potentially significant impacts on public services if it would result in any of the following:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government 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:

1. Fire Protection
2. Police Protection
3. Schools
4. Parks
5. Other Public Facilities

4.14.3 Impact Analysis

The REGPA is designed to minimize impacts to the County’s ability to provide public services by constraining renewable energy development throughout the County in conjunction with the General Plan’s existing protection for such resources. Indirectly, individual future projects have the potential to impact the County’s public service resources.

The following impact analysis primarily focuses on utility scale solar energy facilities because those would likely result in the greatest influx of new people and/or people associated with the facility due the potential size and job opportunities associated with such facilities; however, the analysis also applies to the other proposed categories of solar energy facilities, including distributed generation and community scale facilities.

The proposed REGPA also includes provisions for development of small scale solar energy facilities. However, due to their small size (e.g., small array of ground- or roof-mounted PV panels), and location (on the building or the property it serves), these developments are currently allowed throughout the County within any zoning district under ICC Title 18, and require only electrical and building permits for development. As a result, these developments are not considered to result in impacts under CEQA, and would not typically require the CEQA analysis or associated mitigation measures described in this document.

The County routinely reviews all development proposals for environmental impacts. Therefore, all future solar energy projects would be evaluated on a project-specific basis to assess specific impacts to population and housing against the program level analysis contained in this PEIR. Applicable mitigation measures identified in this PEIR would be implemented for the individual project, as well as any additional mitigation or design measures identified in the population and housing analysis conducted for the project.

4.14.3.1 Fire Protection

Future solar development projects in the SEDAs would require fire protection services in the event of fire, hazardous materials incidents, medical emergencies, or other emergency situations. The SEDAs are generally located in more remote areas of the County, where provision of fire protection would take some time to be provided. Table 4.14-2 summarizes the FPDs in the County, as well as approximate distances and drive times to nearby SEDAs. In addition to the FPDs identified, additional fire protection services in the County include state and federal land management agencies on lands they manage, as well as CAL FIRE.

**Table 4.14-2
FIRE PROTECTION DISTRICTS IN RELATION TO THE
SOLAR ENERGY DEVELOPMENT AREAS**

Fire Protection District Station	Nearby SEDAs	Approximate Distance on Area Roads to SEDA (miles)	Approximate Drive Time¹ from Station to SEDA Boundary (minutes)
Big Pine FPD ² 181 North Main Street Big Pine, CA	Laws	20	22
Bishop FPD ² 209 West Line Street Bishop, CA	Laws	6	10
Independence FPD ² 200 South Jackson Street Independence, CA	Owens Lake	25	28
	Rose Valley	39	38
Lone Pine FPD ² 130 North Jackson Street Lone Pine, CA	Owens Lake	9	14
	Rose Valley	24	25
	Trona	93	102
	Pearsonville	62	61
Olancho Cartago Volunteer Fire Department ³ P.O. Box 64 Olancho, CA	Rose Valley	0.8	3
	Owens Lake	1	3
	Trona	85	88
	Pearsonville	39	36
Southern Inyo FPD 410 Tecopa Hot Springs Road Tecopa, CA	Charleston View	15	20
	Sandy Valley ⁴	39	107
	Chicago Valley	18	25

Source: Google Earth 2014

FPD = Fire Protection District

SEDA = Solar Energy Development Area

¹ Drive time is based on anticipated drive time for the distance indicated, and does not include preparation time for FPDs in response to a call.

² Located within Owens Valley Study Area (OVSA).

³ The Olancho Cartago Volunteer Fire Department does not have a physical station. Distance to nearest SEDA boundary is provided based on distance from the intersection of US 395 and State Route 190 in the community of Olancho.

⁴ Due to the proximity of the Inyo County portion of the community of Sandy Valley, located within the Sandy Valley SEDA to Clark County, the first responders for fire, medical, or law enforcement emergencies are from Nevada (Inyo County 2001)

Some of the SEDAs are located at distances that would require over an hour drive time to the SEDA boundary from the nearest fire stations. Depending on the location of future solar development projects within the SEDAs, drive time could be greater than that identified. Of the eight SEDAs, only three (Laws, Owens Lake, and Rose Valley) are located within an estimated 10-minute drive time from the nearest station. The Charleston View, Chicago Valley, and Pearsonville SEDAs have intermediate drive times of approximately 20, 25, and 36 minutes, respectively. Some of the more remote SEDAs have excessive estimated drive times from the nearest station, including the Trona SEDA, with an estimated 88-minute drive, and the Sandy Valley SEDA, with an estimated 107-minute drive from the nearest stations.

While future solar development projects within the SEDA are not expected to have a higher than average fire hazard in relation to other development projects, they would nonetheless introduce additional human activity to undeveloped areas, resulting in additional potential for fire protection and emergency service needs. Also, the remote locations of some of the SEDAs would result in the commitment of fire protection resources to a larger than average time commitment for emergency services response, thereby reducing resources available elsewhere during the response time.

The Sandy Valley SEDA has an expected drive time distance of approximately 107 minutes. A fire protection services response to the Sandy Valley SEDA would require approximately 3.5 hours drive time, round trip, in addition to the time needed at the site to address the emergency situation. Due to the proximity to Clark County, Nevada, the first responders for the California portion of the community of Sandy Valley (within the Sandy Valley SEDA) for fire, medical, or law enforcement emergencies are from Clark County. Based on the travel time for Inyo County fire protection providers to provide services to the Sandy Valley SEDA, and the lack of paved access to the existing community within the Sandy Valley SEDA from Inyo County (Inyo County 2001), first responders from Clark County would continue to provide services to the community of Sandy Valley and potentially future solar development projects within the SEDA.

The proposed REGPA includes a proposed Economic Development policy (Policy ED-4.4) which requires renewable energy solar facility development to provide the means to offset the costs to the County, including, but not limited to, the cost of infrastructure improvements and County services. This policy also indicates that economic impacts from renewable energy solar facility development identified by the County shall be offset. Additionally, existing General Plan polices already in place require the provision of public facilities and services to new development and the payment of fees for new development to offset impacts to existing services and infrastructure. Nonetheless, for the reasons described above, the commitment of fire protection resources to future solar development projects is a potentially significant impact, requiring mitigation.

4.14.3.2 Police Protection

Police protection service needs for future solar development projects could be associated with increased traffic along access routes to the project site. Construction of future solar development projects would generate activity at respective project sites, including trips to and from the project sites for hauling of project materials and the transport of construction workers to the site. This increased activity could result in an increase in vehicle accidents along the route to a project site. The need for law enforcement at future solar development project sites could also occur for incidents related to worker conflicts and potential vandalism and/or theft during construction and long-term operation of the projects. Table 4.14-3 summarizes the law enforcement station locations in the County, identifies nearby SEDAs, and lists approximate distances and drive times between the stations and SEDA boundaries. The approximate response times are estimated drive times from the nearest stations to the SEDA boundaries and therefore represent minimum expected drive times to future project sites in the SEDAs. Depending on the location of future projects within the SEDA, drive times could be longer than those identified in the table below.

Table 4.14-3 LAW ENFORCEMENT STATIONS IN RELATION TO THE SOLAR ENERGY DEVELOPMENT AREAS			
Station	Nearby SEDAs	Approximate Distance on Area Roads to SEDA (miles)	Approximate Drive Time¹ from Station to SEDA Boundary (minutes)
Inyo County Sheriff's Department			
Independence Substation ² 550 South Clay Street Independence, CA	Owens Lake	25	30
	Rose Valley	39	38
	Pearsonville	38	63
	Trona	108	116
Bishop Substation ² 301 West Line Street Bishop, CA	Laws	5	8
Shoshone Resident Post 15 California 127 Shosone, CA	Chicago Valley	7	13
	Charleston View	25	35
	Sandy Valley	50	131
Death Valley Resident Post Furnace Creek Ranch Death Valley, CA	Chicago Valley	64	71
	Charleston View	82	92
	Sandy Valley ³	104	164
California Highway Patrol			
CHP Bishop Office ² 469 South Main Street Bishop, CA	Laws	5	8

Sources: ICSD 2014; Google Earth 2014

CHP = California Highway Patrol

SEDA = Solar Energy Development Area

¹ Drive time is based only on anticipated drive time for the distance indicated, and does not include preparation time in response to a call or response from elsewhere in the County instead of the station.

² Within Owens Valley Study Area (OVSA)

³ Due to the proximity of the Inyo County portion of the community of Sandy Valley, located within the Sandy Valley SEDA to Clark County, the first responders for fire, medical, or law enforcement emergencies are from Nevada (Inyo County 2001)

While existing law enforcement is in place in the County, the ICSD and CHP provide services to a large area. Some of the SEDAs are located in isolated areas, particularly the Eastern Solar Energy Group (consisting of the Chicago Valley, Charleston View, and Sandy Valley SEDAs). The existing community within the Sandy Valley SEDA receives first responder service from Clark County, Nevada for emergency calls, including law enforcement. Based on the travel time for Inyo County emergency service providers to provide services to the Sandy Valley SEDA, and the lack of paved access to the existing community within the Sandy Valley SEDA from Inyo County (Inyo County 2001), first responders from Clark County would continue to provide services to the community of Sandy Valley and potentially future solar development projects within the SEDA.

The Trona SEDA is also located remotely from the nearest law enforcement station, at approximately 108 miles. While law enforcement responding to calls in the SEDAs would not necessarily be responding or travelling from the nearest substation, as officers may be out

patrolling portions of the vast County, it is expected that response times to several SEDAs would be excessive, and a round trip to a project site within some of the SEDAs and back to a substation would take a considerable amount of time, potentially removing law enforcement resources that are needed elsewhere in the County.

The REGPA includes a proposed Economic Element policy which requires renewable energy solar facility development to provide the means to offset the costs to the County for county services. Additional General Plan policies are also in place for offsetting the cost of providing services to new development, as listed in Section 4.14.1 above. Nonetheless, the need for law enforcement services for future solar development project sites in the SEDAs is a potentially significant impact, requiring mitigation.

4.14.3.3 Schools

Demand for new and/or expanded school facilities are directly associated with increases in local population. Future solar development projects are not expected to result in the construction of new housing, and thus, would not result in a direct increase in population or school-aged children in the County. As discussed in Section 4.13, temporary jobs are expected to be associated with the construction of future solar development projects; however, these jobs are largely expected to be filled by construction workers already living in the County, or by visiting workers that travel to the area for temporary construction employment. It is not expected that construction workers traveling from outside of the County to work on future solar development projects would relocate families with school-aged children during the term of their temporary work. Thus, construction of future solar development projects in the County would not be expected to result in an increase in school age children or result in impacts to the capacity of local schools.

Also as discussed in Section 4.13, long-term job generation associated with future solar energy development projects is expected to be low. Minor long-term employment needs are expected to be associated with the operation of future solar development projects and would include jobs associated with management, monitoring, and maintenance of the facilities. This relatively small, permanent workforce is likely to be composed, at least partially, by workers already residing in the County. Small numbers of long-term workers may relocate to the County on a permanent basis and bring families with school-aged children. Future solar development projects would be subject to the payment of school mitigation fees required by Senate Bill 50. As such, impacts to schools would be considered less than significant.

4.14.3.4 Parks

As discussed for school facilities above, future solar development projects are not expected to result in substantial direct or indirect population increases. Temporary jobs would be generated during construction of individual future solar development projects; however, these jobs are not expected to result in permanent population increases in the County. Small amounts of long-term jobs could be generated as a result of future solar development projects; however, any population increases associated with long-term jobs for future solar development projects is expected to be minor. These jobs may be filled by persons already residing in the County or small numbers of long-term workers may relocate to the County on a permanent basis to fill these positions. Regardless, the small amount of jobs generated from long-term operation of future solar

development projects is expected to result in a minimal increase in population, and thus, a minimal increase in the usage of local parks. Impacts would be less than significant, pursuant to ICC Title 21 and the REGPA policies.

4.14.3.5 Other Public Facilities

The project would not result in a noticeable increase in demand for emergency services at the hospitals located within the County. While there is potential for an accident requiring emergency hospital services to occur at the remote location of future solar development projects in the SEDAs, this potential is similar to other activities already occurring in the County at remote locations. Future solar development projects within the SEDAs would have temporary construction work forces at these remote sites, and thus, the potential need for emergency hospital services associated with construction work would be temporary and insignificant. Long-term activity at future solar development project sites would involve limited personnel presence at each site associated with maintenance, monitoring, and management of facilities. Medical emergencies requiring hospital services are expected to be minimal during the long-term operation of future solar development projects.

Medical emergencies requiring hospital services occurring within the Laws SEDA would likely utilize the Northern Inyo Hospital, while emergencies occurring in the Owens Lake and Rose Valley SEDAs would likely utilize the Southern Inyo Hospital. The other SEDAs are located at greater distances from the two Inyo County hospitals and would likely require the use of hospital services outside of the County during medical emergencies. Desert View Regional Medical Center in Pahrump, Nevada, is located approximately 20 miles (estimated 28-minute drive) from Chicago Valley SEDA, approximately 16 miles (estimated 39-minute drive) from the Charleston View SEDA, and approximately 44 miles (estimated 87-minute drive) from the Sandy Valley SEDA. Ridgecrest Regional Hospital is located in the City of Ridgecrest in Kern County, south of Inyo County. Ridgecrest Regional Hospital is approximately 27 miles (estimated 33-minute drive) from the Trona SEDA and approximately 21 miles (estimated 28-minute drive) from the Pearsonville SEDA. The need for hospital services is expected to be minimal, and the availability of hospitals both within and outside of the County would result in minimal impacts to hospital services associated with future solar projects. Impacts would be less than significant, pursuant to ICC Title 21 and the REGPA policies.

4.14.4 Level of Significance before Mitigation

Based on the analyses in Section 4.14.3, future utility scale, distributed generation, and community scale solar energy facility projects under the REGPA could result in potentially significant impacts related to fire and police protection. These impacts require mitigation to reduce them to the maximum extent feasible. Impacts associated with schools, parks, and other public facilities would be less than significant and no mitigation is required. Small scale projects are typically considered to result in no impacts under CEQA.

4.14.5 Mitigation Measures

Public services mitigation measures have been developed for solar energy development projects producing more than 20 MW of electricity for off-site use (utility scale) and would be

implemented to mitigate adverse impacts to public services. As previously mentioned, small scale solar energy projects are considered to result in no impacts under CEQA; however, all individual solar energy facility project applications (including small scale, community scale, and distributed generation) shall be reviewed by the County, and the need for implementation of the following mitigation measures shall be determined based on the professional judgment of a qualified county planner, pursuant to ICC Title 21 and State CEQA Guidelines. For example, community scale solar developments (i.e., roof- or ground-mounted PV panels for a specific community's use) may be determined by a qualified county planner to have no potential impact on public services and would not require an analysis of public safety and response times or implementation of the public services mitigation measures listed in this section. In such cases, the County shall document that no impacts to public services would occur and no mitigation measures are necessary in lieu of the analysis required in Mitigation Measure PUB-1.

If a proposed distributed generation or community scale solar development project is determined by the County to have the potential to impact geological resources and soils, then the following mitigation measures shall be implemented as determined necessary by the qualified county planner. The County will review future solar energy development proposals to determine if they meet the requirements of Section 15162 of the State CEQA Guidelines; projects that do not meet the requirements may require additional CEQA analysis prior to approval. Similar to proposed distributed generation and community scale solar energy projects, small scale solar project applications undergo County review, and implementation of additional CEQA review and/or mitigation measures shall be at the discretion of a qualified county planner.

As described above in Sections 4.6.3 and 4.6.4, implementation of solar energy projects under the REGPA could result in potentially significant impacts related to public services. Accordingly, the following mitigation measures are provided to address those issues, and include applicable BMPs and related information from REAT's Best Management Practices and Guidance Manual (REAT 2010). Implementation of these measures would reduce the severity of identified impacts to public services, and may reduce them to below a level of significance in most cases.

MM PUB-1: Analyze public safety and protection response times and staff levels for each utility scale project.

Site specific analysis of fire and police protection service response times and staffing levels shall be completed for proposed future solar development projects, as deemed appropriate by the County, at the cost of the project applicant, prior to final project design approval of each project. The analysis shall include a determination regarding a project's impact to fire and police protection services and outline feasible measures to maintain adequate response times for fire and police protection services.

MM PUB-2: Provide onsite security during the construction and long-term operation of the utility scale project.

For project sites associated with proposed future solar development projects that are determined through Mitigation Measure PUB-1 to have insufficient law enforcement protection services or significant impacts to law enforcement services, project proponents shall be required to provide

adequate, onsite private security for the duration of construction activities and during the long-term operation of the project to the satisfaction of the County. The actual size and configuration of the security detail shall be determined by the County during preparation of the Development Agreement for the future solar energy project.

MM PUB-3: Pay mitigation fees for public safety and protection services.

The County shall require project proponents to pay development mitigation fees for fire and police protection services, pursuant to ICC Title 21. Said fees shall be used to maintain proper staffing levels for fire and police protection services and to sustain adequate response times as required by the County.

4.14.6 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse public service impacts would result from implementation of the proposed project.

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