

4.15. PUBLIC SERVICES

This section includes the following discussion and analysis related to public services: existing physical and regulatory setting; methodology and criteria for evaluating impacts; and results of the impact assessment, including identification of potentially significant impacts and corresponding mitigation measures to avoid or substantially lessen such impacts to the extent feasible, as appropriate.

PEIR Scoping Comments

During the PEIR scoping process, the District received two letters containing a comment related to public services. The comments submitted are summarized below (see PEIR Scoping Report in Appendix A of this document).

Leadership Counsel for Justice and Accountability

The comment letter requested that the PEIR analyze threats to human health or the environment associated with any hazardous materials and solid waste generated by the construction and operation of the project, including the movement and disposal of these materials both on and off-site. The comments also requested an analysis of the potential for fires associated with energy storage and transmission.

Fresno County Fire Protection District (FCFPD)

The comments from FCFPD are contained in a letter that refers extensively to Resolution 2025-02 adopted by the FCFPD Board of Directors, which is attached to the comment letter. The comment letter states: “As set forth in Resolution 2025-02, the FCFPD has determined that there is both a direct impact and cumulative impact on emergency response capabilities of the FCFPD to respond to fire, rescue, and medical services emergencies posed by the operation of: 1) solar photovoltaic (PV) generating facilities, and 2) stand-alone energy storage facilities (“PV projects”). The comment letter requests that the project proponent(s) be required to enter into a Fire Services Agreement with FCFPD consistent with Resolution 2025-02. According to FCFPD Resolution 2025-02, due to a state-mandated property tax exclusion for new solar facilities, the solar PV projects would not provide additional property tax revenues that would support FCFPD fire, rescue and medical emergency services to the solar PV projects. According to FCFPD, this property tax exclusion for new solar facilities creates a need for fire services agreements between solar developers and FCFPD.¹

[Note: Fire hazard and protection is addressed in Section 4.14.3. *Environmental Impact Analysis* under Impact PS-1, and in Section 4.18. *Wildfire*.]

¹ In response, it is noted that the referenced property tax exclusion is due to sunset at the end of 2026. Thus, it is highly likely that VCIP solar facilities will be fully subject to property tax. This increased tax revenue would be substantial for each solar/BESS project and may be sufficient to cover the cost of increased fire protection service that FCFPD anticipates. {AM0014.1}

4.15.1. Environmental Setting

Fire Protection and Emergency Services

Fire protection and emergency medical services in the VCIP Plan Area are provided by FCFPD and California Department of Forestry and Fire Protection (CAL FIRE). These fire agencies are described below.

FCFPD has an emergency response staff of 39 personnel who are stationed at 15 full-time fire stations organized under seven battalions throughout Fresno County. The southern portion of the Plan Area lies within Battalion 14, including Fire Station 93 in Huron and Station 94 near Harris Ranch. The northern portion of the Plan Area is Battalion 15, including Station 95 in Tranquillity and Station 96 in Mendota. FCFPD provides a full range of emergency response services, which include structural and wildland fire suppression, response to hazardous materials incidents, search and rescue, and basic life support medical services, among other services. FCFPD would provide fire and emergency medical response services to the VCIP facilities. For medical emergencies, the nearest engine company is dispatched in conjunction with the private ambulance provider. FCFPD responds to over 14,000 incidents annually, of which approximately 8,000 or 68 percent are medical in nature (FCFPD 2025).

CAL FIRE has primary responsibility for the State Responsibility Area (SRA) in the foothill areas west of I-5. The nearest CAL FIRE stations that would serve the Plan Area are in Coalinga and Santa Nella. FCFPD has a contract with CAL FIRE for cooperative fire protection services (CAL FIRE 2024a). For a full discussion of CAL FIRE's responsibilities with respect to wildfire, see Section 4.18. *Wildfire*.

The Central California Emergency Medical Services Agency (CCEMSA) is responsible for medical emergencies and responses for Fresno, Madera, King, and Tulare counties. CCEMSA provides policies, protocols, and operation support for medical incidents in the counties and is responsible for emergency dispatch of ambulances (CCEMSA 2025).

Law Enforcement Services

The Fresno County Sheriff's Office (FCSO) provides law enforcement services to the unincorporated areas of Fresno County and several incorporated cities by contract. Sheriff's patrols are divided into four patrol areas, each commanded by a lieutenant who supervises field services from the area substation. The western area of Fresno County, including the entire Plan Area, is served by patrols dispatched from the Area 1 substation located in the City of San Joaquin (FCSO 2025).

The California Highway Patrol (CHP) handles traffic enforcement and vehicle accident investigations for the unincorporated areas of Fresno. The Plan Area is within the responsibility area of the CHP Coalinga office which is responsible for western Fresno and Kings counties (CHP 2025).

Schools

The VCIP Plan Area includes major portions of four school districts and small portions of four adjacent school districts, as described below.

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The Mendota Unified School District covers the northern third of the Plan Area. No District schools are located within the Plan Area and three schools are located within one mile of the Plan Area boundary, including: McCabe Elementary School, Mendota Junior High School, and Mendota High School.

The Golden Plains Unified School District (GPUSD) encompasses the central portion of the Plan Area. One GPUSD school – Cantua Creek Elementary School – is located within the plan Area on W. Clarkson Avenue in the community of Cantua Creek.

The Westside Elementary School District (WESD) is in the south-central portion of the Plan Area. WESD includes the Westside Elementary School located on W. Excelsior Avenue in the community of Westside.

The Coalinga/Huron Joint Unified School District (CHJUSD) covers the southern and southwestern portions of the Plan Area. CHJUSD includes three schools in the City of Huron including Huron Elementary, Huron Middle School, and Chestnut High School. These schools are located within one mile of the Plan Area but are not within the Plan Area. The CHJUSD operates five schools in the City of Coalinga, including three elementary schools, a middle school, and a high school. The Coalinga schools are located at least four miles west of the Plan Area boundary.

Four other school districts are partially located within the Plan Area but have no schools in or within one mile of the Plan Area. These districts include: Dos Palos Oro Loma Joint Unified School District to the northwest; Firebaugh-Las Deltas Joint Unified School District to the northeast; Burrel Union Elementary School District to the east; and Riverdale Joint Unified School District to the east (FCSS 2025).

Parks and Recreation

There are no city or county parks within the VCIP Plan Area, except for a portion of Rojas Pierce Park in Mendota which has not been annexed to the City and remains within the District's service area. The cities of Mendota and Huron also have public parks within one mile of the Plan Area.

There are two wildlife areas managed by the California Department of Fish and Wildlife within or adjacent to the Plan Area. The Pilibos Wildlife Area is located approximately 12 miles west of Mendota on a 128-acre site adjacent to the San Luis Canal. The wildlife area is managed specifically for scheduled dove hunts by permit (CDFW 2025a).

The Mendota Wildlife Area is an approximately 12,000-acre wildlife habitat management area located southeast of Mendota. Comprised largely of wetlands, the Wildlife Area provides habitat for numerous bird species and provides recreational opportunities in the form of bird watching and hunting of doves and ducks (CDFW 2025b). (See Section 4.4. *Biological Resources* for additional description of this and other wildlife areas in the region.)

In addition, BLM's Tumey Hills Recreation Area is located one mile west of the Plan Area off Panoche Road. Recreational activities at Tumey Hills include hiking, camping, wildlife viewing, and hunting.

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Other Public Facilities

The nearest public libraries are located outside the Plan Area in the cities of Mendota and San Joaquin, and the community of Tranquillity. The nearest community centers are located outside the Plan Area in Mendota and San Joaquin. The nearest major hospital (level-1 trauma center) is the Community Regional Medical Center in Fresno. Nearby medical clinics / urgent care centers are located in Mendota, Firebaugh, Coalinga and Avenal.

4.15.2. Regulatory Context

Federal

There are no federal laws, regulations, or policies pertaining to public services that are relevant to the VCIP.

State

California Fire Code

Similar to the International Fire Code (IFC), the California Fire Code (Fire Code) and the California Building Code (CBC) use a hazards classification system to determine the appropriate measures to incorporate to protect life and property. The Fire Code includes regulations regarding fire-resistance-rated construction, fire protection systems such as alarm and sprinkler systems, fire services features such as fire apparatus access roads, means of egress, fire safety during construction and demolition, and wildland-urban interface areas. Fire Code Section 4906 contains regulations for vegetation and fuel management to maintain clearances around structures. These requirements establish minimum standards to protect buildings located in Fire Hazard Severity Zones (FHSZs) within the SRA. Section 608 of the IFC has been adopted by the State of California and Fresno County to minimize risk of fire from stationary battery storage systems and to contain fire in the event of such an incident. Fresno County has adopted the Fire Code in its Ordinance Code as part of its building and construction regulations.

Fresno County

Fresno County General Plan

The Public Services and Facilities Element of the Fresno County General Plan (Fresno County 2024b) contains the following goals and policies related to public services that may be relevant to the VCIP:

Public Services and Facilities Element

G. Law Enforcement

- GOAL PF-G** To protect life and property by deterring crime and ensuring the prompt and efficient provision of law enforcement service and facility needs to meet the growing demand for police services associated with an increasing population.

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- Policy PF-G.2 Law Enforcement Staffing Standards**
The County shall strive to maintain a staffing ratio of two (2) sworn officers serving unincorporated residents per 1,000 residents served. (This count of officers includes all ranks of deputy sheriff personnel and excludes all support positions and all sworn officers serving county wide population interests such as bailiffs, and sworn officers serving contract cities and grant-specific populations).
- Policy PF-G.4 Law Enforcement Service Standards**
The County shall require development to pay its fair share of the costs for providing law enforcement facilities and equipment to maintain service standards.
- Policy PF-G.6 Safe Design Features**
The County shall promote the incorporation of safe design features (e.g., lighting, adequate view from streets into parks) into new development by providing the Sheriff Department the opportunity to review development proposals.

H. Fire Protection and Medical Services

- GOAL PF-H** To ensure the prompt and efficient provision of fire and emergency medical facility and service needs, to protect residents of and visitors to Fresno County from injury and loss of life, and to protect property from fire.
- Policy PF-H.2 Adequate Fire Protection Facilities**
Prior to the approval of a development project, the County shall determine the need for fire protection services. New development in unincorporated areas of the County shall not be approved until such time that fire protection facilities and services acceptable to the Public Works and Planning Director in consultation with the appropriate fire district are provided.
- Policy PF-H.5 Minimize Fire Hazard Risk**
The County shall require that new development be designed to maximize safety and minimize fire hazard risks to life and property.
- Policy PF-H.8 Minimum Response Times**
The County shall encourage local fire protection agencies in the county to maintain the following as minimum standards for average first alarm response times to emergency calls:
- a. 5 minutes in urban areas;
 - b. 15 minutes in suburban areas; and
 - c. 20 minutes in rural areas.

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Policy PF-H.9 Fair-Share Costs
The County shall require new development to develop or to pay its fair share of the costs to fund fire protection facilities that, at a minimum, maintain the service level standards in the preceding policies.

Policy PF-H.10 California Fire Code
The County shall ensure that all proposed developments are reviewed for compliance with fire safety standards by responsible local fire agencies per the California Fire Code and other State and local ordinances.

Fresno County Fire Code

The County Ordinance Code, at Section 15.10.010, adopts and incorporates by reference the 2022 CBC as the Fresno County Fire Code (Fresno County 2024i).

For a full description of federal, state, and local statutes, regulations, codes, and standards related to fire safety and wildfire prevention, see Section 4.18. *Wildfire*.

4.15.3. Environmental Impact Analysis

METHODOLOGY

Evaluation of potential project impacts related to public services was based on the likelihood of VCIP implementation to increase demand or otherwise affect public services to the extent of resulting in the need for construction of new or altered public services facilities.

SIGNIFICANCE CRITERIA

Based on Appendix G of the state CEQA Guidelines, the project would be considered to result in a significant impact related to public services if it would:

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 following public services:
 - a) Fire Protection.
 - b) Police Protection.
 - c) Schools.
 - d) Parks.
 - e) Other public facilities.

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4.15.3.1. DIRECT AND INDIRECT EFFECTS

Impact PS-1. Fire Protection Services

Implementation of the VCIP Energy Resource and Infrastructure Plans would result in an incremental increase in demand for fire protection services, and this increase could be substantial and thus could result in degradation of service levels potentially leading to the necessity to construct new or expanded facilities. (*Less-than-Significant Impact with Mitigation*)

Fire Hazards During Construction

During construction, equipment and materials can pose potential fire hazards. Construction of the solar facilities, energy storage facilities, substations, and gen-tie and transmission lines would involve use of heavy construction equipment, vehicles, generators, and hazardous materials (e.g., fuels, lubricating oils, and welding materials), which pose potential fire hazards. The risk of fire would be primarily related to refueling and operating vehicles and equipment off internal driveways where dry vegetation could be ignited. Welding activities also have the potential to result in the combustion of vegetation, as would smoking by construction workers.

As discussed in Chapter 2. *Project Description*, construction workers would receive training in fire safety and suppression to prevent fire and respond effectively in the unlikely event fire does break out.

Fire Hazards During Operation

During the operation of solar and energy storage facilities, equipment such as transformers, inverters, and substation equipment would involve the use of oils (e.g., dielectric or mineral oils and lubricants) and fuels, which would pose potential fire hazards. The battery storage facilities would also pose a potential fire hazard. Maintenance vehicles and panel washing trucks would travel among the solar arrays where low vegetation would be dry in summer and potentially combustible. Smoking by operational personnel would also pose a fire hazard.

The VCIP solar facilities would include several design and operational measures for fire prevention and suppression. Design measures include incorporation of County design standards for minimum driveway widths, ground clearance, and accessibility to all areas of the project. Fire prevention measures would include vegetation management to minimize the potential for grass fires. VCIP projects would be constructed in accordance with applicable state and local standards, including the Fresno County Fire Code, which would require fireproofing and protection for all equipment. Solar panels would be manufactured from fire-resistant materials, and the associated electrical equipment would be enclosed with fire-resistant material. Electrical equipment such as transformers and inverters would be placed on concrete foundation pads and housed in steel and concrete equipment enclosures, minimizing the risk of electrical sparks that could ignite vegetation in the event of equipment failure. All electrical equipment (including inverters) not located within a larger structure would be designed specifically for outdoor installation, and all electrical equipment would be subject to product safety standards. Vehicles and equipment would be required to be parked or stored away from vegetated areas. All construction and operations personnel would be trained in fire prevention and suppression measures, including the safe shut-down of electrical equipment during emergency incidents.

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Portable carbon dioxide (CO₂) fire extinguishers would be mounted at the inverter/transformer pads throughout the Project. Maintenance crews would regularly inspect facilities for reliability and safety.

The VCIP energy storage facilities would consist of prefabricated electrical enclosures containing battery banks and associated switchboards, inverters and transformers. All battery containers would be installed on concrete foundations designed to provide secondary containment. The enclosures would have appropriate fire suppression systems built to code. Each energy storage unit would be designed in compliance with Section 608 of the IFC, which has been adopted by the State of California as California Fire Code section 1207, which is also adopted as the Fresno County Fire Code, to minimize risk of fire from stationary storage battery systems and contain fire in the event of such an incident. Under California law, the battery enclosures also must comply with Article 480 of the Electrical Code requiring appropriate insulation and venting for these types of systems, further decreasing associated risk of fire from the battery enclosures. The battery storage facilities would be equipped with fire suppression systems, smoke detectors, and emergency stops. For a detailed discussion of fire safety issues related to BESS, see Section 4.9. *Hazards and Hazardous Materials*, under Impact HAZ-2. As discussed in that section, the regulatory framework to ensure BESS safety and emergency response has advanced significantly in recent years. Thus, implementation of existing laws, codes, standards, and industry standard practices at the project level would avoid or reduce to a less-than-significant level the potential health, safety, and environmental hazards associated with BESS operation.

The VCIP solar and energy storage facilities would be required to comply with the regulations of the National Fire Protection Association and the American Insurance Association. Prior to building permit approval by Fresno County, the FCFPD's Fire Prevention/Fire Code Enforcement Bureau would review the construction plans for each VCIP project to ensure compliance with all code requirements and standards, including minimum requirements for emergency vehicle access and fire breaks. (For detailed discussion, see "Fire Emergency Response" below.)

Upon completion of each solar and energy storage facility, the exposed soils beneath and around the solar arrays would be revegetated to prevent erosion and dust generation, and also to protect on-site soils for future reclamation upon decommissioning. The exposed areas would be planted with an approved seed mix containing only "low water use" and low-growing plant species. The vegetative cover would be kept low through mechanical means (or sheep grazing) which would reduce fuel load buildup and reduce the potential hazard from grass fires. For each potential VCIP solar and BESS project, a Vegetation and Soil Management Plan (VSMP) would be required as specified in Mitigation Measure AG-1a. Protection of Long-Term Agricultural Land Capability. The preparation and implementation of the VSMP throughout the operational life of the solar/BESS facilities would ensure that onsite vegetation would be installed and maintained in a manner that would minimize fire hazard.

The VCIP gen-tie and transmission lines would present potential fire ignition sources. However, design and construction of transmission facilities would be subject to the National Electric Safety Code (NESC). As the transmission lines would be designed to withstand strong winds, tower or conductor failure would be highly unlikely and is not reasonably foreseeable. By requiring vertical and horizontal separation between towers and lines from existing vegetation and crops (e.g., orchard trees), the vegetation clearance requirements under NERC Standard FAC-003 and its California equivalents would prevent this existing vegetation from becoming a potential ignition source. In addition, transmission lines would be subject to utility Fire Prevention Plans and Wildfire Mitigation Plans prepared pursuant to state law. The relatively few potential VCIP projects in the SRA

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west of I-5 would be subject to enhanced restrictions during fire seasons, as well as review of project plans by CAL FIRE.

Fire Emergency Response

Given the comprehensive fire prevention requirements, standards, and practices applicable to the VCIP projects, as described above, the frequency of calls for emergency fire service is expected to be low. If and when needed, fire protection and emergency medical services to the VCIP Plan Area would be provided by the FCFPD, with response provided from the nearest FCFPD stations in Tranquillity, Harris Ranch, and Mendota. Assistance would be provided as requested from other fire departments in the region that participate in automatic aid or mutual aid agreements. The proximity of County fire services and effective road network of the Plan Area would facilitate accessibility of emergency vehicles and result in favorable response times. Based on driving distances between the fire stations and nearby areas of the VCIP Plan Area, it is expected that the response times from these fire stations for any emergency call from the Plan Area would remain consistent with the 20-minute response time goal in the County General Plan. The VCIP projects located in the SRA west of I-5 would receive fire emergency response by CAL FIRE from its nearby station in Coalinga, and the FCFPD, with assistance as needed from the other fire departments in the region. (For further discussion of fire hazard in the SRA, see Section 4.18. *Wildfire.*)

FCFPD Resolution 2025-02, attached to FCFPD’s comment letter, states: “the entire west side of Fresno County lacks the resources to respond to fire, rescue, and medical services emergencies to the existing towns and energy facilities in an appropriate time. Lack of a central area station, crew, water tenders, and engines have been identified as needed by the [FCFPD].” In addition, Resolution 2025-02 states: “[fire] stations on the western side of the County are presently understaffed and under-equipped to handle emergency responses to the growing population of towns on the west side including Mendota, Tranquillity, San Joaquin, Coalinga, and others with current resources even with automatic mutual aid thus making it even more difficult to provide for these populations if personnel and equipment are responding to incidents at PV project sites.” Resolution 2025-02 also states that FCFPD “has determined that there is both a direct impact and cumulative impact on emergency response capabilities of the [FCFPD] to respond to fire, rescue, and medical services emergencies posed by the operation of the solar PV projects.” Finally, Resolution 2025-02 states that FCFPD “has determined that is necessary for solar PV projects to enter into an agreement with the [FCFPD] to provide payments to offset the direct and cumulative impact of solar PV projects on the [FCFPD].” To calculate the payments, “[T]he [FCFPD] staff has derived a methodology consisting of a formulas for PV project developer payments to ensure the funding of new facilities, apparatus and equipment, as well as enhancement of existing facilities.” (FCFPD 2024 – contained in the PEIR Scoping Report in Appendix A of this document.)

FCFPD Resolution 2025-02 also asserts that due to state-mandated property tax exclusion for new solar facilities under Revenue and Taxation Code section 73, the solar PV projects would not provide additional property tax revenues that would support FCFPD fire, rescue and medical emergency services to the solar PV projects. (In response, it is noted that the referenced property tax exclusion is due to sunset at the end of 2026, so that it is highly likely that VCIP solar facilities will be fully subject to property tax. This increased tax revenue would be substantial for each solar/BESS project and may be sufficient to cover the cost of increased fire protection service that FCFPD anticipates.)

Based on the comment letter from FCFPD generally asserting that the VCIP projects could result in an incremental increase in demand for fire protection services and that this increase could be substantial and thus could result in degradation of service levels, this PEIR concludes at a programmatic level that implementation {AM0014.1}

of proposed VCIP projects could lead to the need construct new or expanded facilities. Therefore, it is concluded that implementation of the VCIP Energy Resource and Infrastructure Plans would result in a *potentially significant impact* related to an increase in fire protection services that could necessitate the alteration or construction of fire stations or other infrastructure to combat fire.

Mitigation Measure PS-1: Fire Protection Mitigation.

Prior to the issuance of building permits for each solar and BESS project to be constructed under the VCIP, the project proponent and the FCFPD shall enter into an agreement regarding funding of FCFPD services, if applicable, in the absence of increased property tax revenues generated by the project sufficient to cover the demonstrated cost of providing service to the project. The amount of funding to be provided by each project, if any, shall be supported by a financial analysis which establishes the requisite nexus and provides substantial evidence that the calculated funding amount bears a reasonable relationship (i.e., is roughly proportional) to the cost of FCFPD services to be provided to the project.

Significance After Mitigation: Less-than-significant impact.

Impact PS-2. Law Enforcement and Security

Implementation of the VCIP Energy Resource and Infrastructure Plans would result in an incremental increase in demand for law enforcement services; however, this increase is expected to be insubstantial and therefore would not degrade service levels or result in the need for new or altered law enforcement facilities. (No Impact)

Law enforcement services to the VCIP Plan Area are provided by the Fresno County Sheriff's Office and the CHP. During construction and decommissioning of the solar, energy storage, substations, and gen-tie and transmission lines, police services may be required due to possible theft of construction equipment and/or vandalism, although private security would be engaged to monitor the work sites during construction. Experience on previous solar construction projects in the District indicates that the presence of on-site security staff virtually eliminates the incidence of theft and vandalism at the sites (Biller 2025).

Slow moving trucks could result in temporary congestion near the project entrances and could pose a safety hazard due to abrupt changes in the speed of traffic flow, or due to slow turning movements across on-coming lanes of traffic. Construction of gen-tie and transmission lines may require temporary partial closure of roadways, especially where transmission lines are strung over public roadways. Any temporary traffic disruptions would involve coordination with the Sheriff's Office and/or CHP. The temporary traffic hazards associated with VCIP project construction and decommissioning are discussed in Section 4.15. *Transportation*, under Impact TR-4. Any potential traffic hazard impacts would be avoided or substantially reduced through implementation of the traffic control measures set forth in Mitigation Measure TR-1. The required traffic management measures would minimize use of the Fresno County Sheriff's Office and CHP resources.

Once each potential VCIP project is completed and operational, calls for service from the solar and energy storage facilities would be expected to be infrequent, primarily due to the comprehensive security measures

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included in the design and operation of the solar and energy storage projects, described as follows. The perimeter of each project phase would be securely fenced and gated to prevent unauthorized access. Electronic surveillance equipment such as infrared security cameras and motion detectors would be installed around each solar facility. These project security features would be intended to act as a deterrent to crimes such as theft and vandalism and would be operationally integrated with the services of a private security company. Video feeds from the surveillance equipment would be transmitted in real time to the off-site security contractor for monitoring. If the surveillance system detects a breach, a security representative would be dispatched to the site. Experience with existing solar facilities in the District indicates that the presence of on-site security staff during all off hours (evenings and weekends) virtually eliminates the incidence of theft and vandalism at the facilities (Biller 2025).

Overall demand for law enforcement services would be very low during construction, operation, and decommissioning of VCIP facilities. Since implementation of the VCIP Energy Resource and Infrastructure Plans would not result in a substantial increase in demand for law enforcement services, there would be *no impact* in terms of necessitating new or physically altered Sheriff's Office or CHP facilities to maintain adequate service levels.

Mitigation Measures: No mitigation is required.

Impact PS-3. Schools, Parks, and Other Public Facilities

Implementation of the VCIP Energy Resource and Infrastructure Plans would result in no demand for schools, parks, or other public facilities, and therefore would not degrade service levels or result in the need for new or altered schools, parks, or other public facilities. (No Impact)

Schools

The VCIP energy resource and infrastructure projects would not include or require housing components. The construction and decommissioning phases of each project would be temporary and most workers would reside within commuting distance, while the few who would come from outside the area would find temporary accommodation nearby during the work week. It is not expected that any construction workers would relocate to the area with their families, and thus the VCIP projects would not result in an increased school-aged population who would create a need for new or expanded school facilities. During operations, typical solar and energy storage projects would employ about ten permanent operational staff, plus a daily average of ten additional workers who would visit the facilities periodically for maintenance and repair. These permanent staff are expected to be drawn from existing communities in the region. The collection substations, gen-tie lines and connector transmission lines would require no permanent staff for operations. In summary, the construction, operation, and decommissioning of the VCIP facilities would not result in increased housing or population in the region, and thus would have *no impact* on schools. However, each solar project would pay a school mitigation fee, as mandated by state law for all commercial development.

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Parks

Demand for parks and recreation is mainly generated by residential development. Construction of VCIP facilities would involve no permanent staff, and the few permanent staff involved in facility operations would be unlikely to seek out recreational activities in the area before, during, or after working hours. Moreover, permanent staff would be drawn from the surrounding communities and would not be new residents to those communities. As such, VCIP implementation would not increase demand for parks and recreational facilities and would have *no impact* in terms of necessitating new or expanded parks facilities.

Other Public Facilities

The VCIP projects would generate no demand for social services, courts, libraries, or other public services. On rare occasions, the use of medical facilities may be needed in the event of work injuries, but such incidents would be readily accommodated at existing facilities. As such, VCIP implementation would have *no impact* in terms of necessitating new or expanded facilities to maintain adequate service levels for these other public services.

Mitigation Measures: No mitigation is required.

4.15.3.2. TRANSMISSION CORRIDORS OUTSIDE THE VCIP

The transmission corridors for delivery of solar generation from VCIP projects to urban electricity markets in northern and southern California have been identified at a conceptual level in this PEIR to allow a very general discussion of environmental impacts associated with transmission line development in these corridors for informational purposes. These transmission delivery corridors extend far beyond the District's boundaries and are not part of the proposed VCIP. Planning and approval of these outside transmission lines are under the jurisdiction of the state and federal energy regulatory agencies (e.g., CPUC, WAPA), public utilities (e.g., PG&E, SCE), and cities and counties traversed by the transmission corridors. The following discussion provides an overview of potential impacts of the outside transmission lines with respect to public services and is included for information purposes only.

Fire Protection and Emergency Services

During construction of the outside transmission lines, equipment and materials can pose potential fire hazards. Construction would involve use of heavy construction equipment, vehicles, generators, and hazardous materials (e.g., fuels, lubricating oils, and welding materials), which pose potential fire hazards. The risk of fire would be primarily related to refueling and operating vehicles and equipment in areas where dry vegetation could be ignited. Welding activities also have the potential to result in the combustion of vegetation, as would smoking by construction workers. Transmission line construction workers would receive training in fire safety and suppression to prevent fire and respond effectively in the unlikely event fire does break out.

Transmission line operation would present potential fire ignition sources particularly in the remote mountain areas. However, design and construction of transmission facilities would be subject to the NESC. As the transmission lines would be designed to withstand strong winds, tower or conductor failure would be highly

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unlikely and is not reasonably foreseeable. By requiring vertical and horizontal separation between towers and lines from existing vegetation and crops (e.g., orchard trees), the vegetation clearance requirements under NERC Standard FAC-003 and its California equivalents would prevent this existing vegetation from becoming potential ignition sources. In addition, transmission lines would be subject to utility Fire Prevention Plans and Wildfire Mitigation Plans prepared pursuant to state law. Compliance with all applicable codes, standards, and required fire safety measures during construction and operation of the outside transmission lines, as required, would provide a high degree of protection from wildfire risk.

Fire hazard mapping by CAL FIRE shows that approximately half of the outside transmission corridors are in the SRA, with the remainder in the Local Responsibility Areas (LRAs) of the affected counties. Within the valley floor areas that comprise the LRAs, fire hazard mapping by CAL FIRE shows the lands traversed by the outside transmission lines as “unzoned,” indicating low fire hazard. Fires initiated in or near the transmission corridors in the valley areas are expected to be infrequent and county fire departments with primary responsibility for the LRAs would readily respond to any such incidents with no discernible effect on overall service levels.

Approximately half of the outside transmission corridors pass through rugged terrain within the SRA where CAL Fire has primary responsibility for responding to fire emergencies. Fire prevention measures in these remote areas include vegetation management to maintain minimum clearance requirements, and by enhanced restrictions placed on activities during fire seasons, especially during Red Flag Warnings of Fire Weather Watch advisories by the National Weather Service. All equipment and machinery would be equipped with spark arresters.

The risk of fire ignitions associated with the outside transmission corridors would be substantially reduced by the fire safety measures required to be incorporated into the design, construction, and maintenance of the outside transmission lines. Thus, the additional burden on firefighting agencies due to potential fires initiated by the outside transmission lines would not be substantial and would not necessitate new or altered facilities to maintain service levels or performance objectives.

Law Enforcement and Security

Construction of the outside transmission lines may require police assistance with temporary road closures when transmission lines are being strung over public roads. However, the overall demand for law enforcement services would be low and would not result in the need for new or altered police facilities.

Schools

Construction of the outside transmission lines would involve relatively small crews that would be constantly moving as transmission line installation progresses over hundreds of miles. Some crew members would be drawn from surrounding communities, and some would come from outside the area and seek temporary accommodation during the work week. Given the transient nature of the work, the construction of the outside transmission lines would not involve permanent relocation of families who would bring new school-aged children to the project area. During operations, the transmission lines would be unstaffed except for occasional visits by workers conducting inspections or maintenance. As such, the outside transmission lines would not result in the need for new or expanded schools.

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Parks

Demand for parks and recreation is mainly generated by residential development. The outside transmission lines would involve small mobile crews during construction, and no staff during operation. As such, the outside transmission lines would not increase demand for parks and recreational facilities and would not result in the need for new or expanded parks or recreation facilities.

Other Public Facilities

The outside transmission lines would generate no demand for social services, courts, libraries, or other public services, and may on rare occasions require the use of medical facilities in the event of work injuries. As such, the outside transmission lines would not result in the need for new or expanded facilities to maintain adequate service levels for these other public services.

4.15.3.3. CUMULATIVE IMPACTS

Fire Protection and Emergency Services

As shown in the cumulative projects list in Table 4.0-2, most of the pending, approved, and completed projects consist of large-scale solar, energy storage or other clean energy and electrical facilities, along with their associated substations and gen-tie lines. As discussed for the VCIP projects under Impact PS-1, the potential for fire at these facilities is substantially reduced by the numerous laws, regulations, codes, standards, and protocols that would be incorporated into the design, construction, and operation of these facilities for the purposes of fire prevention, protection, and suppression. However, largely due to Revenue and Taxation Code section 73, which exempts solar/BESS facilities and prevents a rise in property taxes that would support FCFPD's services, FCFPD commented that it anticipates a direct impact and a cumulative impact on emergency response capabilities of the FCFPD due to the demands on fire service resulting from solar and BESS development in Fresno County (FCFPD 2024). As noted above, however, this property tax exclusion will expire at the end of 2026, before the proposed VCIP and several cumulative solar and BESS projects would likely be implemented. The other cumulative projects in the unincorporated area include three small commercial centers and four agricultural processing facilities, all of which would be constructed in accordance with the Fresno County Fire Code. The potential for fire incidents at these cumulative projects is low, and any emergency calls would be readily handled by the four nearby FCFPD stations distributed throughout western Fresno County, in addition to the CAL FIRE station in Coalinga.

The remaining cumulative projects in Table 4.0-2 consist of six urban development projects for residential, commercial, and industrial uses in the City of Lemoore. These projects would be constructed in accordance with the Lemoore Fire Code and served by the Lemoore Fire Department, and would not place additional demand on FCFPD, except in rare instances of requests for mutual aid (Lemoore 2020, 2021, 2022a, 2022b, 2023a, 2023b).

As discussed in Section 4.18.3.2, the risk of fire ignitions associated with the outside transmission corridors is substantially reduced to a less-than-significant level by the fire safety measures required to be incorporated into the design, construction, and maintenance of the outside transmission lines. Thus, the additional burden on firefighting agencies due to potential fires initiated by the outside transmission lines would be relatively low {AM0014.1}

and not cumulatively considerable. Cumulative development in the vicinity of the outside transmission lines would largely consist of very low density rural residential development as allowed in rural areas under the applicable counties' general plans. Cumulative development on the valley floor segments of the transmission corridor would be subject to low fire risk and would have a low demand for fire protection services. Cumulative development in the rugged mountain terrain traversed by half of the transmission corridors would be located in the SRA where the mapped fire hazard ranges from moderate to high in most areas, and is very high in the San Gabriel Mountains to the northwest of the Vincent Substation. The rural development in these fire risk areas would be subject to strict vegetation management standards under California Fire Code Section 4906, which requires minimum setback distances of vegetation to combustible structures, the use of fire-resistant vegetation, and restrictions on planting of trees and shrubs. In addition, seven CAL FIRE stations are located in the vicinity of the SRA traversed by the outside transmission corridors, as well as ten counties with their own fire departments. Given that the fire risk along the outside transmission corridors would be spread among various fire protection agencies, the cumulative additional demand on any one agency would not be substantial and would not necessitate new or altered facilities to maintain service levels or performance objectives; as such it would not be cumulatively considerable.

Cumulative demand for fire protection service upon the FCFPD, CAL FIRE, or any of the other affected county fire departments may be sufficient to create the need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. Therefore, the potential cumulative impacts *would be significant*, and the contribution from implementation of the VCIP Energy Resource and Infrastructure Plans *would be cumulatively considerable*. However, the cumulative contribution from VCIP implementation would be mitigated by implementation of MM PS-1 [Fire Protection Mitigation], and it is anticipated that other cumulative projects in Fresno County would be subject to similar mitigation measures.

Law Enforcement and Security Services

As discussed above, most of the cumulative projects consist of large-scale solar, energy storage or other clean energy and electrical facilities, along with their associated substations and gen-tie lines. As discussed for the VCIP projects under Impact PS-2, these projects use comprehensive security features including perimeter fencing, video surveillance, and security patrols. During construction, police assistance is occasionally needed with road closures and traffic control. Therefore, the potential demand for law enforcement service from these facilities is low, on an individual project and cumulative basis. As such, these projects would not result in substantial degradation of service levels for the Fresno County Sheriff's Office or CHP. The other cumulative projects in the unincorporated area include four agricultural processing facilities, all of which would have low demand for law enforcement services. Cumulative projects also include three small commercial centers, two of which would be on I-5 and the third at the junction of SR-198 and SR-269. These commercial centers could be subject to calls for shoplifting, vandalism, and other criminal incidents. However, these centers would be relatively small, and the overall cumulative demand for law enforcement services would be low. Thus, demand from these commercial projects would not combine with the low demand from the energy and agriculture related projects to result in a substantial degradation in service levels or performance objectives of the Fresno County Sheriff's Office or CHP.

The remaining cumulative projects in Table 4.0-2 consist of six urban development projects for residential, commercial, and industrial uses in the City of Lemoore. The demand for law enforcement service by these projects would be met by the Lemoore Police Department and would not place additional demand on the Fresno County Sheriff's Office or CHP (Lemoore 2020, 2021, 2022a, 2022b, 2023a, 2023b).

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As discussed in Section 4.18.3.2, construction of the outside transmission lines would require occasional assistance from law enforcement for temporary road closures when transmission lines are strung over public roads, or with other temporary needs for traffic control. Operation of the transmission lines would require no law enforcement services. The rural residential development that would be allowed in the general vicinity of the outside transmission lines would also place a low demand on police services, which would be spread over ten counties traversed by the transmission corridors.

Cumulative demand for law enforcement services upon the Fresno County Sheriff's Office, CHP, or any of the other affected county sheriff's departments would not be substantial and would not create the need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. Therefore, the cumulative impact *would be less than significant*, and the contribution from implementation of the VCIP Energy Resource and Infrastructure Plans *would not be considerable*.

Schools

Most of the cumulative projects consist of large-scale solar and energy storage facilities, associated substations, gen-tie and transmission lines, agricultural processing facilities, and commercial and industrial development. None of these projects would include new housing or population that would include school-aged children. In the City of Lemoore, there are four approved residential projects with a total of over 1,461 housing units, which would generate a total of 866 new students (Lemoore 2020, 2022a, 2022b, 2023). To cover the costs of providing additional school facilities to serve these students, each project will be required to pay impact fees as required under the Education Code and Government Code. Payment of fees authorized by statute is deemed "full and complete" mitigation for school impacts (Government Code, section 65996).

The construction of the outside transmission lines would temporarily involve relatively small work crews, and transmission line operation would involve periodic visits by inspection and maintenance personnel. The rural residential development that would be allowed in the general vicinity of the outside transmission lines would also generate few school-aged children, which would be spread over ten counties traversed by the transmission corridors. Since the outside transmission lines would not include new housing, they would have no impact on schools, and the contribution from the outside transmission lines to any cumulative impact to schools would not be considerable.

In summary, the cumulative impact to schools would be *less than significant*, and the contribution from implementation of the VCIP Energy Resource and Infrastructure Plans to any cumulative impact *would not be considerable*.

Parks

Most of the cumulative projects are non-residential and would have no impact on parks. In the City of Lemoore, there are four approved residential projects that would increase the City's population by approximately 4,529 persons. Based on the City's ordinance requirement of 5 acres of parkland per thousand residents, approximately 23 acres of new parkland would be required for these projects, or payment of fees in lieu of new parkland dedication (Lemoore 2020, 2022a, 2022b, 2023). Since all four of these projects will be required to comply with the City's parkland mitigation requirement, impacts to parks would be less than significant, both on an individual project and cumulative basis.

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As discussed above, the outside transmission lines would not include new housing, and therefore would have no impact related to demand for additional parks.

The cumulative impacts to parks would be *less than significant*, and the contribution from implementation of the VCIP Energy Resource and Infrastructure Plans to any cumulative impact *would not be considerable*.

Other Public Services

The types of other public services commonly affected by development projects include social services, courts, hospitals, and libraries. Cumulative projects consist mainly of clean energy facilities and other non-residential uses. These facilities would result in no permanent increases in population or employment, and therefore, would not result in increased demand for these other public services.

Construction of the residential projects approved in the City of Lemoore would generate demand for other public services. However, the small increase in demand from these projects would not require construction of additional facilities (Lemoore 2020, 2022a, 2022b, 2023). As such, the cumulative projects would not collectively result in the need for new or expanded public facilities which would result in adverse physical environmental impacts. Therefore, there would be *no cumulative impact* associated with these other public services, and the contribution from implementation of the VCIP Energy Resource and Infrastructure Plans to any cumulative impact *would not be considerable*.

4.15.4. References – Public Services

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