From: Alanna Bender
To: LUEG, PDS.PlanningCommission
Subject: [External] Planning Commission Hearing for Boulevard
Date: Wednesday, June 10, 2026 4:06:57 PM

Hello,
My name is Alanna Gray and I am a resident of Boulevard, CA. I am writing in response to the notice of the Planning Commission hearing on June 12, 2026. I am respectfully asking for a postponement of the hearing in order to have time to review and prepare for the Planning Commission meeting as the Final EIR and BESS Plume Study was released only 11 days before the scheduled Planning Commission hearing.
Thank you,

Alanna Gray
39211 Hwy 94
Boulevard, CA 91905

From: Chantaia Soleil
To: LUEG, PDS.PlanningCommission
Subject: [External] Request for 60-Day Continuance of the Starlight Solar Project Hearing
Date: Monday, June 8, 2026 11:42:07 PM

Dear San Diego County Planning Department,

I respectfully request a 60-day continuance of the Starlight Solar Project hearing currently scheduled for June 12, 2026.

The Final Environmental Impact Report (FEIR) and Battery Energy Storage System (BESS) Plume Study were only made publicly available on June 1, leaving residents and stakeholders with insufficient time to review these highly technical documents before the hearing.

Given that this project includes one of the largest battery storage facilities proposed in California, and that the findings directly relate to human health, human safety, emergency response, and potential impacts to our community, it is reasonable and necessary to allow the public adequate time to thoroughly review the information and seek expert input.

A 60-day extension would support meaningful public participation and help ensure that decisions affecting the safety and well-being of our community are made with the benefit of a complete and informed review.

Thank you for your consideration.

Sincerely,

Chanti Holroyd

Boulevard Community

From: CLINT BIGHAM
To: LUEG, PDS.PlanningCommission
Subject: [External] Solar Projects
Date: Wednesday, June 10, 2026 7:48:41 PM

Dear San Diego County Planning Department,
I respectfully request a 60-day continuance of the Starlight Solar Project hearing currently scheduled for June 12, 2026.

The Final Environmental Impact Report (FEIR) and Battery Energy Storage System (BESS) Plume Study were only made publicly available on June 1, leaving residents and stakeholders with insufficient time to review these highly technical documents before the hearing.
Given that this project includes one of the largest battery storage facilities proposed in California, and that the findings directly relate to human health, human safety, emergency response, and potential impacts to our community, it is reasonable and necessary to allow the public adequate time to thoroughly review the information and seek expert input.
A 60-day extension would support meaningful public participation and help ensure that decisions affecting the safety and well-being of our community are made with the benefit of a complete and informed review.

Thank you for your consideration.

Sincerely,

Clint Bigham

Sent from my iPhone

From:	David Veit
To:	LUEG, PDS.PlanningCommission
Subject:	[External] Request for 60-Day Continuance of the Starlight Solar Project Hearing
Date:	Sunday, June 7, 2026 12:26:30 AM

Dear San Diego County Planning Department,

I respectfully request a 60-day continuance of the Starlight Solar Project hearing currently scheduled for June 12, 2026.

The Final Environmental Impact Report (FEIR) and Battery Energy Storage System (BESS) Plume Study were only made publicly available on June 1, leaving residents and stakeholders with insufficient time to review these highly technical documents before the hearing.

Given that this project includes one of the largest battery storage facilities proposed in California, and that the findings directly relate to human health, human safety, emergency response, and potential impacts to our community, it is reasonable and necessary to allow the public adequate time to thoroughly review the information and seek expert input.

A 60-day extension would support meaningful public participation and help ensure that decisions affecting the safety and well-being of our community are made with the benefit of a complete and informed review.

Thank you for your consideration.

Sincerely,

David Veit
Principal Photographer
(619) 847-8880

David Veit Photography
8674 Somerset Avenue
San Diego, CA 92123

www.VeitPhotography.com

"David Veit Photography" on Social Media
(Facebook, Twitter & Yelp!)

From:	David McMannus
To:	LUEG, PDS.PlanningCommission
Subject:	[External] Starlight Solar Project hearing
Date:	Monday, June 8, 2026 8:24:51 AM

Dear San Diego County Planning Commission,

Please consider delaying the Starlight Solar Project hearing. The results of the Final Environmental Impact Report were only made available to the public on June 1st. The hearing is scheduled for June 12th. The residents of the area impacted haven't had time to review the documents, let alone gather together to discuss these things. We also need to review the Battery Energy Storage System Plume Study. Parts of the Boulevard area don't even have cell phone coverage. There are dead zones throughout the area. Many people don't have computers or Internet access, and we haven't needed to organize for anything until now. That's one of the reasons they call us an "Unorganized Community of San Diego County". We aren't a town or a city, with a Mayor or a town council. We need time to get word out throughout our community.

I realize that wealthy corporations and large organizations control our world, and that our community is small and therefore has little control over anything, but we should at least be able to speak ours minds regarding what happens to our community, and we need to know exactly what is happening and what it's going to do to us in order to give our opinions. Please give us that time.

Thank you all for giving consideration to our needs. We appreciate the work you are doing.

David and Sam McMannus
davidmcmannus@yahoo.com

From: Dustin Valentine
To: LUEG, PDS.PlanningCommission
Subject: [External] Request for 60-Day Continuance of the Starlight Solar Project Hearing
Date: Monday, June 8, 2026 11:03:29 PM

Dear San Diego County Planning Department,

I am writing to respectfully request a 60-day continuance of the Starlight Solar Project hearing currently scheduled for June 12, 2026.

As a Boulevard community member, I am deeply concerned that the Final Environmental Impact Report and the Battery Energy Storage System Plume Study were only released on June 1, 2026. These are highly technical and important documents, and our residents, local leaders, first responders, and community stakeholders need a meaningful opportunity to review them carefully before any major decision is made.

This project has serious implications for public health, human safety, emergency response planning, fire risk, livestock, wildlife, schools, homes, and the broader infrastructure of our rural community. It is not reasonable to expect residents to fully understand and respond to these materials in such a short window of time, especially when the findings may directly affect the safety and well-being of families living in Boulevard.

A 60-day postponement would allow the public to consult with experts, better understand the newly released studies, and provide more informed input. When issues of human safety and community protection are involved, a complete and thoughtful review process is essential.

I strongly urge the County to grant this continuance so that Boulevard residents are given a fair and meaningful opportunity to participate in this process.

Thank you for your consideration.

Sincerely,
Dustin Valentine

From: JAMES FREEBURN
To: LUEG, PDS.PlanningCommission
Subject: [External] Request for 60 day extension Starlight Solar Sarsten
Date: Sunday, June 7, 2026 11:05:21 AM

We need 60 more days to evaluate and request appropriate consideration for local needs as this project moves forward. It is complex.

I am a resident out here and we want to be heard in this process. We respect all stakeholders and want to be completely included in an intelligent and safe path forward.

Thank you!

Jim Freeburn
1585 Jewel Valley Rd
Boulevard Ca 91905

Sent from my iPhone

From: Jonah Henry
To: LUEG, PDS.PlanningCommission
Subject: [External] Support for Starlight Solar project
Date: Tuesday, June 9, 2026 8:01:56 AM

Good morning Chair Ashman, Vice Chair Edwards, and Commissioners Pallinger, Calvo, Weber, Sudberry, and Sabellico,

My name is Jonah Henry and I am a volunteer organizer with the Sunrise Movement. We are a youth-led organization that is fighting to stop the climate crisis and develop a more equitable economy.

I strongly support the Starlight Solar project and I urge the Planning Commission to recommend that the County Board of Supervisors approve the project's Major Use Permit (MUP) without delay. This project will reduce electricity prices, increase grid reliability, and allow SDG&E to reduce its reliance on the gas-fired power plants that are changing our climate and releasing toxic air pollution into fenceline communities throughout southern California. These large-scale solar and battery storage facilities are the only chance we have as a species to preserve our planet for future generations.

Thank you for considering my comment.

Sincerely,
Jonah Henry (he/him)

From: Lemoine Fernandez
To: LUEG, PDS.PlanningCommission
Subject: [External] Starlight Solar Project
Date: Monday, June 8, 2026 6:24:50 PM

Commissioners: Ronald Anderson, Chair
Michael Edwards, Vice Chair
David Pallinger
Yolanda Calvo
Molly Weber
Colton Sudbury
Kevin Sabellico

My name is Lemoine Fernandez and I live at 2039 Jewel Valley Road, Boulevard, CA 91905 in Eastern San Diego County, very close to the Mexican border. I voted in this month's election in San Diego County. I am very concerned about the Starlight Solar Battery Project proposed for my neighborhood.

Every person in Boulevard depends on well water from our underground aquifer which extends into Mexico. It is our only source of water. We know from previous California experience (notably in Escondido and Moss Landing) that battery storage projects will cause fires. We don't know when, but as they age and the cells deteriorate fire will happen. Lithium battery fires can only be addressed with toxic chemicals, not water. These chemicals, plus battery leakage, will seep into ground water, poisoning our aquifer which we share with Mexico.

Additionally there is a toxic plume generated by burning batteries. Boulevard is a very windy place. Wind direction and speed varies constantly by time of day or night and seasonally. The toxic plume from the Starlight Solar Battery Project could easily reach Imperial County, Alpine, El Cajon, La Mesa and even downtown San Diego, as well as Anza-Borrego Desert State Park and Mexico. More time is needed to study the effects of a toxic plume generated by the Starlight Solar Battery Project and attempts to put out a battery fire. Our local Cal Fire Station is not prepared to fight a chemical/industrial BESS fire—lacking equipment, safety gear and training. The local McCain Valley Conservation Camp which trained incarcerated wild fire fighters was closed in 2020.

We know from the recent Border 6 Fire that fire cannot be contained by border walls. This project is so close to the border in high, dry desert country prone to wild fires, that any fire at the proposed Starlight Solar Battery Project site would likely cross into Mexico. Has Mexico been advised of this projects impacts?

I hope you will consider local citizens concerns about safety and the future impacts of the proposed Starlight Solar Battery Project on our lives.

Respectfully,
Lemonine Fernandez
2039 Jewel Valley Road
Boulevard, CA 91905

From: Madeleine Hamann
To: LUEG, PDS.PlanningCommission
Subject: [External] Request for 60-Day Continuance of the Starlight Solar Project Hearing
Date: Sunday, June 7, 2026 11:58:17 AM

Dear San Diego County Planning Department,

I respectfully request a 60-day continuance of the Starlight Solar Project hearing currently scheduled for June 12, 2026.

The Final Environmental Impact Report (FEIR) and Battery Energy Storage System (BESS) Plume Study were only made publicly available on June 1, leaving residents and stakeholders with insufficient time to review these highly technical documents before the hearing.

Given that this project includes one of the largest battery storage facilities proposed in California, and that the findings directly relate to human health, human safety, emergency response, and potential impacts to our community, it is reasonable and necessary to allow the public adequate time to thoroughly review the information and seek expert input.

A 60-day extension would support meaningful public participation and help ensure that decisions affecting the safety and well-being of our community are made with the benefit of a complete and informed review.

Thank you for your consideration.

Sincerely,

Maddie Hamann
Boulevard Resident
Co-founder of PACHA bread

Madeleine Hamann, PhD
Scientist, Artist, Entrepreneur
614-290-6738

From: Murshida Kadre
To: LUEG, PDS.PlanningCommission
Subject: [External] Request for 60-Day Continuance of the Starlight Solar Project Hearing
Date: Tuesday, June 9, 2026 1:18:15 PM

Regarding: Request for 60-Day Continuance of the Starlight Solar Project Hearing

Dear San Diego County Planning Department,

I respectfully request a 60-day continuance of the Starlight Solar Project hearing currently scheduled for June 12, 2026.

I have been informed that the Final Environmental Impact Report (FEIR) and Battery Energy Storage System (BESS) Plume Study were only made publicly available on June 1, leaving residents and stakeholders with insufficient time to review these highly technical documents before the hearing.

Given that this project includes one of the largest battery storage facilities proposed in California, and that the findings directly relate to human health, human safety, emergency response, and potential impacts to our community, it is reasonable and necessary to allow the public adequate time to thoroughly review the information and seek expert input.

The community of Boulevard, CA recommends a 60-day extension, which would support meaningful public participation and help ensure that decisions affecting the safety and well-being of our community are made with the benefit of a complete and informed review.

Thank you for your consideration.

Sincerely,

Rudi M. Kadre
Boulevard Resident

From:	Mason Smith
To:	LUEG, PDS.PlanningCommission
Subject:	[External] Subject: Request for 60-Day Continuance of the Starlight Solar Project Hearing
Date:	Sunday, June 7, 2026 12:21:42 AM

Dear San Diego County Planning Department,

I respectfully request a 60-day continuance of the Starlight Solar Project hearing currently scheduled for June 12, 2026.

The Final Environmental Impact Report (FEIR) and Battery Energy Storage System (BESS) Plume Study were only made publicly available on June 1, leaving residents and stakeholders with insufficient time to review these highly technical documents before the hearing.

Given that this project includes one of the largest battery storage facilities proposed in California, and that the findings directly relate to human health, human safety, emergency response, and potential impacts to our community, it is reasonable and necessary to allow the public adequate time to thoroughly review the information and seek expert input.

A 60-day extension would support meaningful public participation and help ensure that decisions affecting the safety and well-being of our community are made with the benefit of a complete and informed review.

Thank you for your consideration.

Sincerely,

Mason Smith

Boulevard Resident

From: Miles Maeda
To: LUEG, PDS.PlanningCommission
Subject: [External] Request for 60-Day Continuance of the Starlight Solar Project Hearing
Date: Monday, June 8, 2026 1:01:48 PM

Dear San Diego County Planning Department,

I am writing as a resident of Boulevard to respectfully request a 60-day continuance of the Starlight Solar Project hearing scheduled for Friday June 12, 2026.

The Final Environmental Impact Report (FEIR) and Battery Energy Storage System (BESS) Plume Study were not released to the public until June 1, just eleven days before the scheduled vote. For documents of this technical complexity, with findings that bear directly on human health, public safety, emergency response capacity, and the broader well-being of our community, eleven days is simply not adequate time for residents to read, consult with experts, and form an informed response.

This project includes one of the largest proposed battery storage facilities in the state of California. The potential impacts to our families, homes, schools, first responders, livestock, wildlife, and local infrastructure deserve serious and unhurried consideration. A 60-day extension is a modest request given what is at stake, and it would allow for the kind of meaningful public participation that responsible decision-making requires.

I respectfully urge the Planning Commission to grant this continuance.

Thank you for your time and consideration.

Sincerely,
Miles Maeda
Resident, Boulevard, CA

From: Murphy Smith
To: LUEG, PDS.PlanningCommission
Subject: [External] Opposition to Starlight Solar NOISE VIOLATIONS
Date: Monday, June 8, 2026 5:26:28 PM

Dear Commissioners,

My name is Murphy Smith, but my friends call me Murf, so please call me Murf. I am a resident of Boulevard CA 91905, and I am writing in opposition to the Starlight Solar Project.

I am a musician and freelance sound engineer and have been dedicated to working with sound for over two decades. This has required that I relentlessly study acoustics and the science of sound to stay competitive in my field, and it has given me a perspective and background with which I have been examining the noise study within the Starlight Solar DEIR.

Before working through my concerns, I would like to preface with San Diego County General Plan, Chapter 8, Goal N-5 which it specifies is to "locate noise generating industrial facilities at the *maximum practical distance* from residential zones." This is a crucial county goal to keep in mind when considering placing a project like this in a rural residential zone.

The two main concerns I will focus on are two inaccurate facts stated within the noise study. I will be referring to these as lies, as they are pieces of information that can be refuted with documented evidence. There is a little lie, and a very big lie, and I will start with the little lie to prepare for the big one.

The first lie is the one dBF associates gives about wind speed. They state that when they conducted the noise study on June 8, 2022 that the wind speed was 1 to 4 mph during approximately 5 hour window they were here. Any resident of Boulevard would immediately question that, and the fact that this region has one of the largest concentrations of wind turbine farms is a testament of consistently higher wind speeds. Thankfully, there are weather history data services and the actual facts are available. After consulting Visual Crossing, a weather data service that is trusted by Fortune 500 companies and global organizations, I found that the noise study wind data was indeed false. During the hours between 11 am and 4pm on that day, per hour, the wind speed was 5.8 mph, 6.4 mph, 6.6 mph, 7.6 mph, 4.5 mph and 6.4 mph; the entire period had wind gust speeds in the double digits, up to 21 mph. This is much different than what is alleged in the noise study, and the only time it comes close is the 3pm window, but the noise study still chose to understate the data.

One might think that this is insignificant but that could not be farther from the

truth. Given that one of the most significant pre-existing noise sources at the proposed site is wind, gathering this data should have been treated with significant care. Wind noise levels are a significant component of how to get the CNEL, which is the pre-existing noise level in the area, and is a vital part of the noise study and determines how the noise considerations of the project are to continue. Also, because the noise study is primarily done with modeling software the measured real world data must be accurate to produce an accurate result. Cadna/A is the modeling software used in the noise study, and this software has inputs for wind data as parameters for building the models. Inputting inaccurate data will lead to skewed data. By choosing to use inaccurate data, dBf associates has abandoned their scientific objectivity to serve the industrial solar industry, and that choice provides perspective on the next lie they chose to tell as well.

The next lie is even more significant. The data is about pile drivers, which are likely the most significant noise sources during the construction phase. They chose to use 75 dBa at 10 meters (approximately 33 feet) as the representative data for their modeling. This number came from a study from DEFRA, a study from the UK from two decades ago. This study acquired this number for what they called "mini-piling rigs", which are a widely diverse category of equipment, and even included handheld rigs, which obviously produce much lower noise levels than the equipment used in this project. In fact, the Bauer RG21T, which the DEIR states is likely to be the model used for the project, did not even go into production until 2013, almost a decade after the DEFRA study. This modern equipment is much more powerful, with higher torque and force capability, which brings with it increased noise levels. On their website, Bauer explicitly states the "RG21T is our most powerful pile-driver" which leads one to believe it will certainly not be quieter than less powerful equipment from 20 years ago.

This matter is further complicated by the fact that dBf associates seem to know that the 75 dBa metric they provide is not accurate as within this same DEIR they also present a chart, which is also on display on the county's noise website (County of San Diego Guidelines for Determining Significance -Noise) which states that a pile driver produces 90-110 dBa at 50 feet.

These facts are also disputed in several other EIRs for other solar projects using pile-drivers, both locally and nationally. The JVR Energy park in Jacumba, which SD Planning approved and therefore one would assume they agreed with the accuracy of the data, stated in the JVR EIR that the Bauer RG21T produces 85 dBa at 50 feet. Keep in mind that this is 10 dBa over what is stated in Starlight, and a 10dBa increase is a DOUBLING of sound pressure as decibels are a logarithmic scale rather than linear.
The Rugged Solar project, another project proposed for Boulevard, states in their 2015 EIR that they anticipated using the Bauer RG21T as well, and gave noise

levels of 85-90dBa at 50 feet away.

There are many solar projects proposed throughout the United States at this time, and therefore many EIRs available to the public. In comparison, almost every one of them states noise levels associated with pile driving that are usually twice or even three times the sound levels Starlight has given. In the interest of keeping this information brief and concise, I will list several other current EIRs throughout the United States which give information that refutes Starlights 75dBa metric:

Riverside - Sapphire Solar: 98 dBa
Blythe Solar: 84 dBa
Valley Center- Granger Solar: 84 dBa at 50 feet
Kentucky -Lost City Renewables : 90-95 dBa
Kentucky - Song Sparrow Solar: 84-95 dBa
Kentucky- Pine Grove Solar: 101 dBa
Kentucky- Telesto Solar: 90-101 dBa
Kentucky- Russelville Solar: 96-102 dBa
Kentucky- Rhudes Creek Solar: 90-101 dBa
Tonto National Forest Copper Mine Project: 93-112dBa

And a collection of more general, less solar-specific, published pile-driver noise levels from authoritative sources :
Freeway and Highway Administraion FHWA: 85-101 dBa
Steel Piling Solutions: 85-95 dBa
US Army Corps of Engineers: 101 dB at 45 feet
Pile Driving Contractors Association: 85-115 dBa

Bauer does not publish noise levels for their pile-driver. However one of their competitors, Vermeer, does publish noise levels for their PD10, which might be considered their equivalent to the RG21T. In fact , in 2021 Vermeer issued a public statement saying they had previously given inaccurate noise levels and raised it from 84 dBa to 100dBa. This is first-hand information directly from pile-driver manufacturers that the levels generated are nowhere near 75 dBa.

In addition to my time researching and performing comparative EIR analysis, I also did my own noise measurement of a pile-driver in operation. This took place on March 18, 2026 outside of the JVR Energy Park. I used a Digi-Sense 20250-29 meter, professionally calibrated by InnoCal. This meter conforms to the same ANSI IEC61672-1 Class 2 standard as the equipment used in the Starlight Solar noise study. Without trespassing on the property or having knowledge of the construction schedule, I had to keep at a distance which I approximate was at least 150 feet away and perhaps even a bit further. However, even at this distance, when the pile-driver was in operation the meter was recording levels of 69dBa. Using the

standard accepted equation of 6dB loss per doubling of distance, this means that at the ranges discussed in the EIR (33 to 50 feet), the levels would roughly be at least somewhere in the 80-90 dB range or even higher. This agrees with the levels given by all the other sources outside of Starlight Solar.

I understand that the county will specify that Starlight Solar abide by the Construction Noise Management Plan specified in the EIR; however given the discrepancy and outright dishonesty in the numbers that have been presented to the county by dBf associates, there is reason to believe that there is simply no way the project would actually stay within legal county noise limits (not to exceed 75 dBa at property boundaries) given how close it is to noise sensitive land uses (residential zones).

To summarize, the noise levels presented for the pile-driver in the Starlight Solar EIR are refuted by seemingly every other source one can research on the matter, including but not limited too: San Diego County Noise Guidelines, other approved and projected solar EIRs in the region, other solar projects EIRs across the country, the USDA and Forest Service, the specific pile-driver manufacturer, similar competing equivalent pile-driver manufacturers, the Pile Driving Contractor's Association, the Freeway and Highway Administration, the US Army Corps of Engineers, as well as my own measurements during the construction of JVR Energy Park. The absurdly low number presented in the Starlight Solar noise study is so outrageously outside of what is published elsewhere it seems cherry-picked in order to avoid having to mitigate against the very real levels of noise that will be produced.

This is shameful and we should all be appalled at this brazen attempt to lie to the public about facts which are well documented. It is a sign of a sick society when industry tries to trump science, and a symptom of a spreading illness if those in public service ignore the attempted assault on reality. I believe that all of these discrepancies are more than enough reason to ask that an entirely new noise study be done before this project be considered for approval, by a party which can be trusted to be scientifically objective which at this point excludes dBf associates, with much more increased scrutiny from regulatory County officials.

Finally, I would like to give one last reference, this time to The CEQA Memorandum of Understanding which states "CEQA *REQUIRES* that state and local agencies disclose and evaluate the significant environmental impacts of proposed projects and adopt **all feasible mitigation measures"**
It is with this in mind that I believe the county should strongly consider all of the feedback coming from this community in terms of alternatives, modifications, community benefits and mitigation measures , which in my opinion should include required noise barriers, a better noise study, further setbacks from property

boundaries, and mandatory independent regulatory oversight.

Thank you for your time in reading this document. To keep this document clean and easily readable I have not attached sources but I will be happy to provide links to or copy of any of the supporting documents referenced if requested.

With trust and understanding,
Murf

From:	Rebecca Berggren
To:	Koutoufidis, Nicholas
Cc:	LUEG, PDS.PlanningCommission; Smith, Ashley J; Anderson, Joel; Hayes, Andrew; Earl Goodnight
Subject:	[External] Technical Rebuttal to Final EIR Responses to My Comments – Starlight Solar Project (PDS2022-MUP-22-010)
Date:	Friday, June 5, 2026 4:23:55 PM

I am writing this email in formal response to the Final EIR's Response to Comments (specifically Page 107 of Document 8.2.5).

In the comments I submitted on 9/15/26 regarding the Starlight Solar Draft EIR, I shared the following concern:

"With widespread grading, compaction, and concrete slab installation, we are concerned the project will reduce natural groundwater infiltration and potentially harm groundwater recharge."

The response in the Final EIR stated:

"Further, the project would not result in a significant increase in impervious surfaces or significantly alter the existing drainage pattern of the project site. As such, the project would not result in impacts related to groundwater recharge."

This response relies on a flawed analytical baseline and an inaccurate definition of what constitutes an "impervious surface."

The response states that the project will only result in roughly 7% impervious land across the site. While that 7% figure may technically account for concrete slabs, sub-station foundations, and solar pile heads, it completely ignores the massive hydrologic transformation of the remaining graded acreage. This is not a standard, low-impact rural solar development. The physical design requires substantial structural alterations that fundamentally change the hydrology and permeability of our landscape:

- **Extensive Terracing and Compaction:** As documented in the project's own *Preliminary Grading Plans (Appendix B-2 / Sheet 2)*, the developer is creating a massive "staircase" pattern across our sloped backcountry terrain to build the flat pads required for the arrays and the Phase II Battery Storage Area. To execute this, the developer has explicitly designated extensive PROP. 2:1 SLOPE FILL areas.

- **The Legally Mandated Compaction Thresholds:** Per the *San Diego County Grading Ordinance*, all engineered fill material and structural terrace benches must be mechanically compacted to a minimum baseline of **90% relative compaction** (and up to **95% relative compaction** per California Building Code standards beneath the heavy industrial BESS blocks, substation foundations, and the 24-foot fire access roads).

- **The Transition to Semi-Impervious Surfaces:** Soil packed to a 90%–95% maximum dry density behaves structurally more like concrete than open rural land. Mechanical compaction crushes the soil's pore spaces, destroying the ground's natural permeability.

Rainwater will no longer cleanly infiltrate the aquifer to recharge our local private wells; instead, it will act as accelerated sheet-flow runoff slicing across the pads.

- **The Contradiction in Project Diagrams:** The EIR cannot logically claim that the drainage patterns remain unaltered while simultaneously designing an extensive, industrial-grade stormwater system to catch the resulting overflow. The project diagrams explicitly feature large **engineered detention basins, lined spillways, concrete pads with sump drop inlets, and massive 48-inch storage pipes** just to handle the artificial velocity and volume of water shedding off these compacted terraces.

By hiding behind the "7% impervious" statistic and dismissing our groundwater concerns, the Final EIR completely ignores the physical reality of its own engineering specs. Heavily compacting hundreds of acres of sloped terrain to a 90%–95% density threshold will structurally block natural groundwater infiltration, drastically increasing localized runoff while starving the fragile aquifer that our neighborhood wells depend on.

The scientific literature strongly back up these concerns:

- **PV-SMaRT Project (DOE-Funded):** This research confirms that **"highly compacted soils act like impervious surface in creating runoff"** and severely limit stormwater infiltration45. The study specifically warns that highly managed sites involving heavy grading, topsoil removal, or cut-to-fill excavation (like the Starlight project's terracing) have a high likelihood of compaction issues.
    - Source: PV-SMaRT Best Practices (DOE-funded) https://betterenergy.org/wp-content/uploads/2023/01/PV-SMaRT-Best-Practice.pdf
- **2025 Springer Nature Engineering Review:** A peer-reviewed study directly links solar farm construction to reduced aquifer recharge. It concluded that the heavy machinery used during construction lowers soil permeability, which reduces the rate of groundwater recharge, a phenomenon they flagged as a contributor to water scarcity in arid regions.
    - Source: Journal of Umm Al-Qura University / Springer Nature (2025) https://link.springer.com/article/10.1007/s43995-025-00102-7
- **Virginia Tech Study:** Researchers point out that while flat, minimally disturbed solar installations might compromise less than 10% of a site's soil, heavy grading can compromise up to 75% of a site by removing and compacting topsoil.

- Source: Virginia Tech / Bay Journal (2024) https://www.bayjournal.com/news/energy/research-to-help-solar-farms-reduce-erosion-and-runoff/article_65b2600e-4066-11ef-877a-07d22ef0384e.html

- **IOP Science Synthesis Review:** This review of US state stormwater management guidance for solar farms found that the standard recommendation is to **minimize construction-related soil compaction** to maintain the land's natural ability to infiltrate runoff. The Starlight project's mandatory 90% to 95% compaction across hundreds of terraced acres fundamentally contradicts these established best practices.

  - Source: IOP Science environmental research review (2022) https://iopscience.iop.org/article/10.1088/2634-4505/ac76dd

My Request:

1. **Halt and Recirculate the EIR:** Because the Final EIR fails to analyze the hydrologic transformation of hundreds of acres of open land into 90%–95% compacted structural terraces, the document relies on a fundamentally flawed baseline. We demand that the County halt the approval process and require a **Revised and Recirculated Draft EIR** under CEQA Guidelines Section 15088.5. The applicant must provide a revised, long-term groundwater infiltration model that accounts for the near-zero permeability of the engineered terraces.
2. **Implement Enforceable, Cost-Prohibitive Mitigation:** If the County chooses to move forward despite this clear analytical flaw, we demand the implementation of binding, enforceable mitigation measures to protect our community's water security. Specifically, the County must require:
   - The installation of deep-vertical groundwater recharge wells surrounding the project perimeter, paid for in full by the developer, to mechanically inject stormwater back into the aquifer below the compacted zones.
   - A mandatory, legally binding **Groundwater Monitoring and Well-Compensation Fund**, requiring the developer to financially cover the drilling, deepening, or filtration remediation of any private residential well within a 3-mile radius that experiences a drop in water levels or water quality during or after construction.

This is an existential issue for our community. Unlike urban areas, our backcountry homes are entirely reliant on private well water drawing from a sole-source, fractured-rock aquifer. We do not have a municipal water hookup to fall back on. If this project systematically starves the ground of natural infiltration over its vast footprint, it threatens to permanently deplete the very water table our families depend on for survival.

Thank you for your attention.

Rebecca Berggren
Boulevard Homeowner
(619)838-4860

From:	ROBERT WACKER
To:	LUEG, PDS.PlanningCommission
Subject:	[External] request a 60-day continuance of the Starlight Solar Project hearing currently scheduled for June 12, 2026.
Date:	Wednesday, June 10, 2026 8:22:09 PM

San Diego County Planning Department,

I respectfully request a 60-day continuance of the Starlight Solar Project hearing currently scheduled for June 12, 2026.
The Final Environmental Impact Report (FEIR) and Battery Energy Storage System (BESS) Plume Study were only made publicly available on June 1, leaving residents and stakeholders with insufficient time to review these highly technical documents before the hearing.
Given that this project includes one of the largest battery storage facilities proposed in California, and that the findings directly relate to human health, human safety, emergency response, and potential impacts to our community, it is reasonable and necessary to allow the public adequate time to thoroughly review the information and seek expert input.
A 60-day extension would support meaningful public participation and help ensure that decisions affecting the safety and well-being of our community are made with the benefit of a complete and informed review.
Thank you for your consideration.
Sincerely and Respectfully,
Robert Wacker
Los Angeles,Ca

Regular visitor of East San Diego County

From: Shekinah Love
To: LUEG, PDS.PlanningCommission
Subject: [External] Request for 60-Day Continuance of the Starlight Solar Project Hearing
Date: Wednesday, June 10, 2026 7:43:03 PM

Dear San Diego County Planning Department,

I respectfully request a 60-day continuance of the Starlight Solar Project hearing currently scheduled for June 12, 2026.

The Final Environmental Impact Report (FEIR) and Battery Energy Storage System (BESS) Plume Study were only made publicly available on June 1, leaving residents and stakeholders with insufficient time to review these highly technical documents before the hearing.

Given that this project includes one of the largest battery storage facilities proposed in California, and that the findings directly relate to human health, human safety, emergency response, and potential impacts to our community, it is reasonable and necessary to allow the public adequate time to thoroughly review the information and seek expert input.

A 60-day extension would support meaningful public participation and help ensure that decisions affecting the safety and well-being of our community are made with the benefit of a complete and informed review.
Thank you for your consideration.
Sincerely,

Shekinah Love

Sent from Gmail Mobile

From:	Tone M
To:	LUEG, PDS.PlanningCommission
Subject:	[External] Request for 60-Day Continuance of the Starlight Solar Project Hearing
Date:	Monday, June 8, 2026 12:15:15 PM

Dear San Diego County Planning Department,

I respectfully request a 60-day continuance of the Starlight Solar Project hearing currently scheduled for June 12, 2026.

The Final Environmental Impact Report (FEIR) and Battery Energy Storage System (BESS) Plume Study were only made publicly available on June 1, leaving residents and stakeholders with insufficient time to review these highly technical documents before the hearing.

Given that this project includes one of the largest battery storage facilities proposed in California, and that the findings directly relate to human health, human safety, emergency response, and potential impacts to our community, it is reasonable and necessary to allow the public adequate time to thoroughly review the information and seek expert input.

A 60-day extension would support meaningful public participation and help ensure that decisions affecting the safety and well-being of our community are made with the benefit of a complete and informed review.

Thank you for your consideration.

Sincerely,

Tone Morrison

Planning Commission Hearing

Meeting Time: 06-12-26 09:00

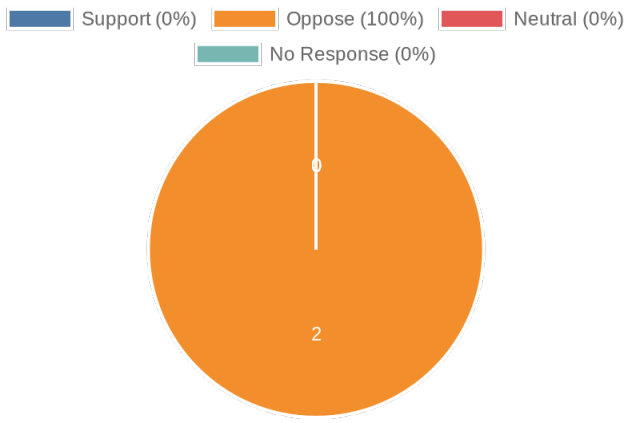
eComments Report

Meetings	Meeting Time	Agenda Items	Comments	Support	Oppose	Neutral
Planning Commission Hearing	06-12-26 09:00	18	2	0	2	0

Sentiments for All Meetings

The following graphs display sentiments for comments that have location data. Only locations of users who have commented will be shown.

Overall Sentiment



Planning Commission Hearing

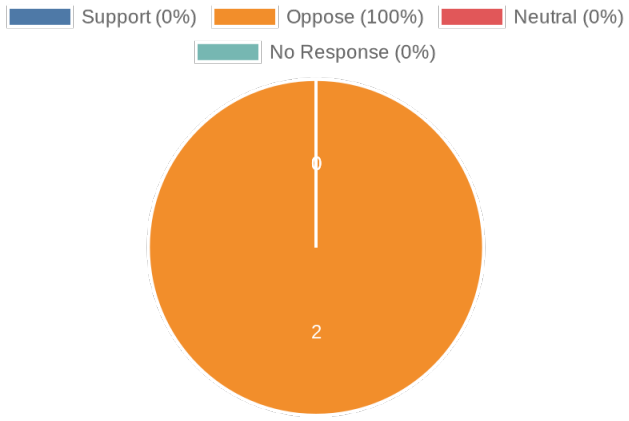
06-12-26 09:00

Agenda Name	Comments	Support	Oppose	Neutral
F. Requests for Continuance	2	0	2	0

Sentiments for All Agenda Items

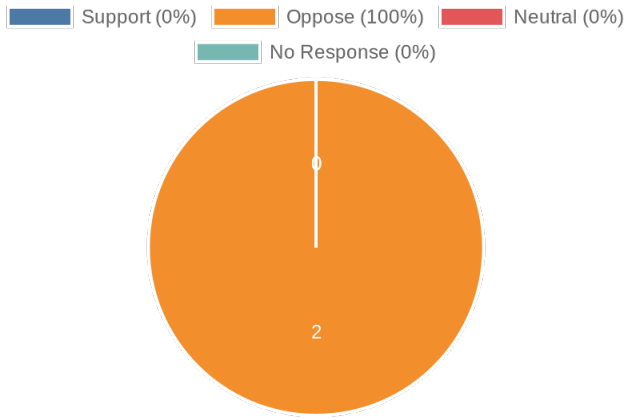
The following graphs display sentiments for comments that have location data. Only locations of users who have commented will be shown.

Overall Sentiment



Agenda Item: eComments for F. Requests for Continuance

Overall Sentiment



Maureen Phillips
Location: 91916, Descanso
Submitted At: 8:59am 06-10-26

Note that the persons commenting on the Starlight Solar Project item are repeatedly asking for continuance based on the most recently submitted modifications to the Plan.

ProtectRuralEscondido ProtectRuralEscondido
Location: 92030, Escondido
Submitted At: 8:56pm 06-07-26

The County has failed to provide adequate notification to review 300pgs of materials for this project that adversely affect our community. The first letter mailed by the County requesting public comment by 5/18 had a misspelled/incorrect project URL link making it difficult to find and review the project files. The County should provide a QR code if they can't provide the correct links to the public. Protect Rural Escondido, on behalf of property owners and businesses, requests a 90-day continuance of this project to allow time for the community to obtain the correct link and have a briefing from the County since there is a number of residents without adequate digital tools (Digital Divide) to access the County's poorly organized online website. Furthermore, the County's agenda report has misspellings of critical project information that further confuse the topic (e.g., strippings). Thank you for your consideration. Respectfully, Protect Rural Escondido

Planning Commission Hearing

Meeting Time: 06-12-26 09:00

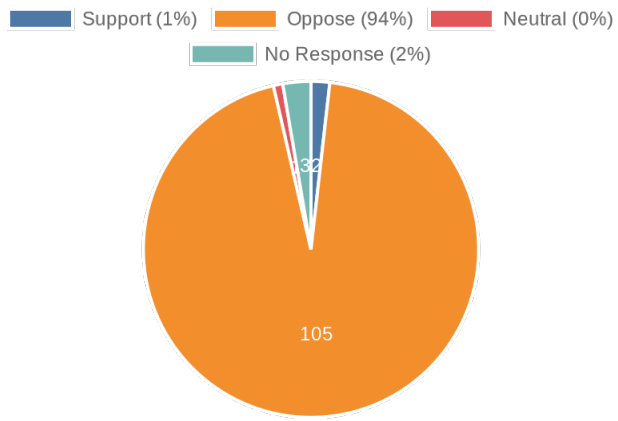
eComments Report

Meetings	Meeting Time	Agenda Items	Comments	Support	Oppose	Neutral
Planning Commission Hearing	06-12-26 09:00	18	111	2	105	1

Sentiments for All Meetings

The following graphs display sentiments for comments that have location data. Only locations of users who have commented will be shown.

Overall Sentiment



Planning Commission Hearing

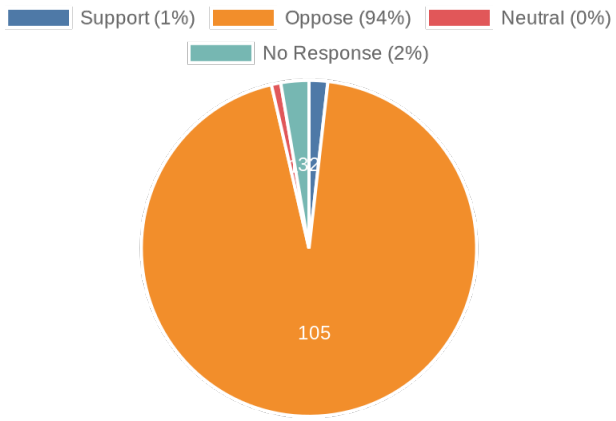
06-12-26 09:00

Agenda Name	Comments	Support	Oppose	Neutral
4. Starlight Solar; PDS2022-MUP-22-010; PDS2022-ER-22-21-002 Proposed conformance with the California Environmental Quality Act (CEQA) – Environmental Impact Report; Mountain Empire Subregional Plan Area (N. Koutoufidis)	111	2	105	1

Sentiments for All Agenda Items

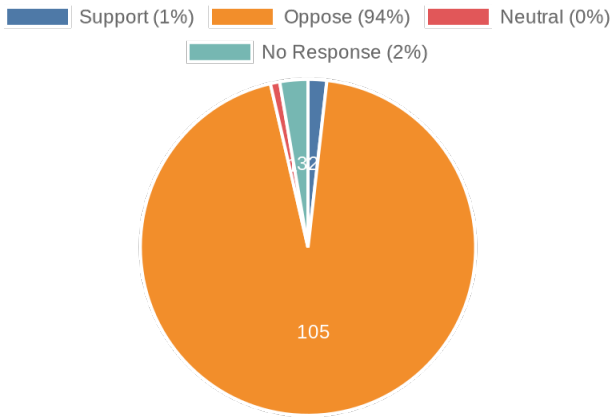
The following graphs display sentiments for comments that have location data. Only locations of users who have commented will be shown.

Overall Sentiment



Agenda Item: eComments for 4. Starlight Solar; PDS2022-MUP-22-010; PDS2022-ER-22-21-002 Proposed conformance with the California Environmental Quality Act (CEQA) – Environmental Impact Report; Mountain Empire Subregional Plan Area (N. Koutoufidis)

Overall Sentiment



Michael Warburton
Location: 91905, Boulevard
Submitted At: 12:06pm 06-11-26

In only the past few years San Diego County has seen 3 fires at battery storage facilities that were difficult to extinguish; the fire in Otay Mesa took 13 days to put out. The thermal runaway risk is high with lithium-ion chemistry batteries, and you are planning to install a huge storage bank of these in a place the county designates as a high fire risk zone? Do not approve this.

Raeline Morgan
Location: 91905, Boulevard
Submitted At: 9:30pm 06-10-26

No starlight project

CLINT BIGHAM
Location: 10022, New York
Submitted At: 7:51pm 06-10-26

I respectfully request a 60-day continuance of the Starlight Solar Project hearing currently scheduled for June 12, 2026.
The Final Environmental Impact Report (FEIR) and Battery Energy Storage System (BESS) Plume Study were only made publicly available on June 1, leaving residents and stakeholders with insufficient time to review these highly technical documents before the hearing.
Given that this project includes one of the largest battery storage facilities proposed in California, and that the findings directly relate to human health, human safety, emergency response, and potential impacts to our community, it is reasonable and necessary to allow the public adequate time to thoroughly review the information and seek expert input.

Clint

Shekinah Love
Location: 92024, Encinitas
Submitted At: 7:47pm 06-10-26

I am respectfully requesting a 60-day continuance of the July 12th public hearing conducted by the County of San Diego Planning Commission, in order to provide reasonable due process for county officials and public review of the recently released Final Environmental Impact Report and the long-awaited and critical Battery Energy Storage System (BESS) Plume Study posted on July 1, 2026.

Ruby Love
Location: 90853, Long Beach
Submitted At: 7:24pm 06-10-26

To whom it may concern:

“I am respectfully requesting a 60-day continuance of the July 12th public hearing conducted by the County of San Diego Planning Commission, in order to provide reasonable due process for county officials and public review of the recently released Final Environmental Impact Report and the long-awaited and critical Battery Energy Storage System (BESS) Plume Study posted on June 1, 2026.”

I am a frequent visitor to the boulevard area with family and friends living out there so I know how important this area is and how beautiful it is and I would hate to see it harmed with such a massive battery installation. Please extend.
Thank you
Ruby Love
858-900-4209

Aaron Peterson
Location: 91905, Boulevard
Submitted At: 6:58pm 06-10-26

I vigorously oppose the Starlight solar and battery storage project and the dangers imposed on our community. Thank you.

Sandra Warburton
Location: 91905
Submitted At: 6:53pm 06-10-26

Oppose

Jesus Sanchez
Location: 91905, Bvd
Submitted At: 5:34pm 06-10-26

This plan is dangerous. I’m opposed.

Tracy Riter
Location: 92021, El Cajon
Submitted At: 4:55pm 06-10-26

This will ruin an entire area and many people’s reason for living there. The people built it don’t care about the cost so long as they don’t have to deal with the repercussions, but they are passing those off on others, and it’s unacceptable.

Margaret Demetris
Location: 91941, La Mesa
Submitted At: 4:53pm 06-10-26

Strongly oppose

Megan Lewis
Location:
Submitted At: 4:35pm 06-10-26

I strongly oppose this project.

James Christ
Location: 91962, Pine Valley
Submitted At: 4:13pm 06-10-26

I request a 90 day extension. And I strongly oppose this project.

James Christ
Location: 91962, Pine Valley
Submitted At: 4:13pm 06-10-26

I request a 90 day extension. And I strongly oppose this project.

Megan Neibert
Location: 92021 , El Cajon
Submitted At: 3:13pm 06-10-26

Strongly oppose the project. Need a 90 day continuance due to the need for further investigation of the EIR and the recently released plume report.

Margy Brookes
Location: 92115, San Diego
Submitted At: 2:17pm 06-10-26

I strongly oppose the Starlight Solar project. This 588-acre industrial complex threatens Boulevard's only paved evacuation route with a 217 MW BESS — seven times larger than the SDG&E battery that forced evacuations in Escondido — while fire modeling ignored our 50+ mph Santa Ana winds. Clover Flat Elementary is less than a mile away. The EIR claims only 7% impervious surface but ignores hundreds of acres compacted to 90–95% density, destroying groundwater recharge that feeds our private wells. The developer rejected the Community Planning Group's $7 million benefits request outright, despite $4 million precedent at Jacumba Valley Ranch. The project clears irreplaceable habitat fragmenting critical wildlife corridors. Property values will plummet, fire insurance is already impossible, and our small community bears endless financial and civic costs fighting project after project with no resources. I urge you to DENY approval of this project entirely.

Beth Brummitt
Location: 92118, Coronado
Submitted At: 12:49pm 06-10-26

Please do at least a 60-day continuance for this complex, high-impact, and highly visible issue!

For decades, I have been a strong advocate for renewable energy, especially solar! BESS is a crucial part of its effectiveness. AND, all of our communities also need to safe and respected. We do not need to choose one over the other, but in this case we do need to look deeper to find the optimum solutions.

The project hugely disturbs the natural beauty of the whole area. It increases the heat island effect in an already hot area without using the PV shade as a co-benefit. It will siphon off water resources from an already arid area. AND, the BESS brings a significant FIRE danger to an area that is already in a high fire risk zone and that has a vibrant and stable community.

Ideally, the effort to relocate or re-design the project can help improve the process for all back-country solar farms, improving outcomes and reducing delays for future projects.

Trent Mitchel
Location: 92021, El Cajon
Submitted At: 11:12am 06-10-26

Strongly oppose the project. Batteries present a serious fire hazard. Need a 90 day continuance due to the need for further investigation of the EIR and the recently released plume report.

Jon Fuller
Location: 91901, ALPINE
Submitted At: 9:44am 06-10-26

90 day extension requested please.

Maureen Phillips
Location: 91916, Descanso
Submitted At: 8:54am 06-10-26

Battery storage projects are being disproportionately placed eastern SD communities. Rural communities lack the fire and water resources and trained personnel of our urban communities. EMS response is not even addressed in this plan. These batteries, if exploded or catch fire, require inordinate amounts of water and will burn for days, emitting toxic gasses over vast geographic areas and burns that require antidotal therapies ems personnel or hospitals do not normally utilize. Healthcare facilities, transport and egress points will be overwhelmed.
This plan has many more inadequacies. It requires a 60 day moratorium (at the very least) to address them, and not with just a bandaid approach. If you are using this project and Jacumba JVR as prototypes for future development, get it right and don't bend to developers antics or whims.
Our communities do not see lower rates or benefit from the energy generated and assume all the risk. You owe your citizens that response.

Dany Qasha
Location: 92020, El Cajon
Submitted At: 8:19am 06-10-26

I am opposed to the solar project. Please give us 90 days to review the project reports

dennis quinn
Location: 91905, Boulevard
Submitted At: 7:24am 06-10-26

I oppose project

Robert Wacker
Location:
Submitted At: 8:51pm 06-09-26

"I am respectfully requesting a 60-day continuance of the July 12th public hearing conducted by the County of San Diego Planning Commission, in order to provide ample time for county officials to receive further public comments regarding the recently released Final Environmental Impact
Report and the long-awaited and critical Battery Energy
Storage System (BESS)
Plume Study posted on July 1, 2026"

Rudi Kadre
Location: 91905, Boulevard
Submitted At: 8:00pm 06-09-26

I am respectfully requesting a 60-day continuance of the July 12th public hearing conducted by the County of San Diego Planning Commission, in order to provide reasonable due process for county officials and public review of the recently released Final Environmental Impact Report and the long-awaited and critical Battery Energy Storage System (BESS) Plume Study posted on July 1, 2026. I have lived in Boulevard off and on for 32 years and have visited friends and family monthly during that time. I'm very concerned about the issue of fire safety. I feel strongly we should be given time to review the report and make a response. Thank you for your consideration.

Ken Kramer
Location: 91942, La Mesa
Submitted At: 7:52pm 06-09-26

Many of my TV stories About San Diego focus on the irreplaceable historical value of pristine areas of our county. Let me be clear. The Starlight Solar project will ruin a space of natural beauty and turn it into an industrial

eyesore. Future generations will wonder at how such a ghastly decision was ever made. Instead, try to imagine power generation on a community, even neighborhood level, with rooftop and other solar systems directed to local and safe battery locations, like fire stations. The type of project being envisioned at Boulevard, so many miles away from where the power will actually be consumed, is fiscally wrongheaded, environmentally shortsighted, raises significant safety and social justice concerns, and would be a sad legacy for decision makers who allowed it. This area of Boulevard should be treasured and protected as one of the most beautiful things About San Diego.

Melissa M
Location: 91905, Boulevard
Submitted At: 7:48pm 06-09-26

I oppose the Starlight Solar project. My husband grew up here, attended Clover Flat Elementary, and graduated from Mountain Empire High. We recently built our home in Boulevard, and this 588-acre industrial complex threatens everything we value about this community.

The 217 MW BESS sits directly beside Jewel Valley Road — our only paved evacuation route — less than a mile from Clover Flat Elementary. The Escondido battery fire was 30 MW; this is seven times larger. Fire modeling ignored our 50+ mph Santa Ana winds. Boulevard already shoulders a disproportionate energy infrastructure burden with zero local benefit while facing significant fire risk, groundwater loss from compacted soils across hundreds of graded acres. Our property values and insurance costs will suffer. This small community has spent years fighting project after project with no resources, and the county refuses to analyze cumulative impacts. I urge you to DENY approval of this project entirely.

Amy Sorensen
Location: 91905, Boulevard
Submitted At: 7:36pm 06-09-26

There is a reason people move out to areas like Boulevard. It is not for convenience, clearly. People either come here for the beauty, isolation, or because this is the only area they can afford to live in this county (61% live below the poverty line) I work in this town. I have had the honor to get to know many of them. They are as real as it gets. For me it’s refreshing. I have only lived out her 5 years. But, I learned quickly how this area of our county gets treated. I understand that each board members responsibility is their constituents. People out here feel like no one represents them. Now you have these projects being forced on us with little or no consideration for how this county has put a unfair burden on the community overall. It is really sad to hear many times customers tell me that they have been told flat out that we don’t matter out here. Do you know that two wild horses have been killed out here since the county approved solar project in Jacumba. Please stop this.

Jonathan Sorensen
Location: 91905, Boylevard
Submitted At: 7:02pm 06-09-26

This is a terrible idea. Is this how we are going to save the planet, by bulldozing the countryside and covering it in plastic? No one out here will benefit from this, but we will all have to look at it every day. Shameful.

Ashley Williams
Location:
Submitted At: 6:50pm 06-09-26

The BESS will hold over 200 MW, seven times larger than the facility in Escondido which caught fire in 2024. That fire burned for days, could not be extinguished with water, forced mandatory evacuations, and released toxic plumes. Boulevard is an extreme fire hazard zone with periodic Santa Ana wind events. The facility has not met the demands for fire OR environmental safety. On top of that, its location will block the ONLY paved evacuation route for residents in the event of a disaster -- and it sits very close to the local elementary school.

The site also supports 14 sensitive vegetation communities within the Peninsular Range and draft ECMSCP area — habitat protections lapsed since 2020. Off-site easements don't replace destroyed wildlife corridors.

Boulevard, Jacumba, and Campo bear all the risk — fire, dust, traffic, visual blight, toxic plumes, noise and light pollution — while electricity flows west. It's hazardous and give us no benefit.

I urge you to DENY approval.

Diane Ang
Location:
Submitted At: 4:21pm 06-09-26

Strongly oppose

Weena Joshi
Location: 91905, San Diego
Submitted At: 3:24pm 06-09-26

There are a lot of reasons to oppose this project, including fire safety, protecting pristine desert chaparral landscape, and creating safe spaces that are free of noise and light pollution. But I would like to focus on the people of rural East County. As a resident myself I am very concerned about the disproportionate burden as a community we place on rural residents. Already compared to California, this census tract is in the bottom 15% of outcomes as measured by the Healthy Places Index. We are on the bottom of all categories, especially when compared to other areas of San Diego County. There is no equity in the distribution of infrastructure needed for climate plans, where are the solar and battery farms in La Jolla, Scripps Ranch, Rancho Santa Fe? Instead, multiple projects are being fast tracked to poor and rural areas that do not have the resources to fight against them. This is externalization of costs at its most naked exploitation, creating modern day sacrifice zones.

Steven BeCk
Location: 91905, Boulevard
Submitted At: 3:03pm 06-09-26

I oppose the Starlight Solar project. The Final EIR acknowledges aesthetics as a significant and unavoidable impact — 588 acres of industrial arrays, batteries, and fencing will permanently destroy Boulevard's rural character and dark skies. The site supports 14 sensitive vegetation communities and lies within the lapsed ECMSCP planning area, meaning approval occurs in a regulatory gap with no meaningful habitat protectjon Property values will drop, fire insurance costs will rise, and Boulevard residents already exhausted from fighting project after project with no staff or funding — bear the full burden while San Diego reaps the benefit. The EIR claims only 7% impervious surface but ignores that grading plans require 90–95% soil compaction across hundreds of acres, crushing infiltration and starving local wells. The 217 MW BESS sits beside Jewel Valley Road, our only evacuation route, and less than a mile from an elementary school. I urge you to DENY approval of this project entirely

Karen Maxted
Location: 91905, Boulevard
Submitted At: 2:58pm 06-09-26

I request 90 day extension. I am opposed to this project. It’s unsafe.

Katrina Westley
Location:
Submitted At: 2:20pm 06-09-26

These project(s) represent a destructive approach to renewable energy that lacks transparency & circumvents more stringent CEQA requirements.These massive energy farms require extensive infrastructure, including transformers & miles of power lines, which destroy critical ecosystems & culturally sacred lands. They also prioritize corporate interests at the expense of the rural communities the COSD is meant to SERVE. We advocate generating energy where it is used. COSD has the opportunity to be an innovative leader by implementing localized solar options rather than relying on OUTDATED "industrial farm" models. The current approach fails to protect our valuable rural resources & strips away the rights of residents. Given the current renewable energy technology available, the destruction of our backcountry is unnecessary. We urge the COSD to conduct more critical research into less invasive energy solutions that preserve our history & environment for future generations.

ZheeZhee Aguirre
Location: 91977, Spring Valley
Submitted At: 1:14pm 06-09-26

I strongly oppose the Starlight Solar project. My family owns property in Boulevard, and I visit regularly — this project puts them and the entire community at unacceptable risk.

The proposed 215 MW BESS sits directly beside the only paved evacuation route for residents. Lithium battery fires burn for hours, release toxic gases, and cannot be extinguished with water. The fire modeling used 4.5 mph winds and ignored Santa Ana events that regularly exceed 50 mph here. Clover Flat Elementary is less than a mile away.

The 588-acre site supports 14 natural vegetation communities, many state-ranked sensitive. This project is advancing in a regulatory gap, destroying habitat and wildlife corridors with no meaningful protection in place.

The EIR also fails to adequately analyze cumulative impacts. Desert Jewel and multiple other energy projects are proposed nearby, yet the county refuses

Please DENY approval of this project.

Katrina Westley
Location: 91934, Jacumba Hot Springs
Submitted At: 12:51pm 06-09-26

RE: Jacumba Community Service District
Dear County of San Diego Planning Commission Board,
In my capacity as the Chairman of the Board for the Jacumba Community Services District (JCSD), I am writing to reference the previous Environmental Impact Report (EIR) and the supplemental EIR.
Please be advised that the JCSD has NO agreement in place regarding the supply of water to the Starlight Solar project.
Thank you,
Katrina Westley
Chairman of the Board
Jacumba Community Service District

Nenette Agulto
Location: 92116, San Diego
Submitted At: 12:11pm 06-09-26

I strongly oppose the Starlight Solar project and urge the Planning Commission to deny its approval. This 588-acre industrial facility poses unacceptable risks and burdens to Boulevard. The 217 MW BESS sits directly beside Jewel Valley Road, our only paved evacuation route, less than a mile from Clover Flat Elementary. Fire modeling omitted Santa Ana winds exceeding 50 mph. A 30 MW battery fire in Escondido forced evacuations; this is seven times larger. The EIR claims only 7% impervious surface while ignoring hundreds of acres compacted to 90–95% density, destroying aquifer recharge that our wells depend on. Aesthetics are admitted as significant and unavoidable. The developer rejected the Planning Group's $7 million community benefits request despite Jacumba precedent. Fourteen sensitive vegetation communities and wildlife corridors will be permanently destroyed during the ECMSCP regulatory gap.

William Iha
Location: 91905, San Diego
Submitted At: 12:07pm 06-09-26

This is not a clean or green project like it is being passed off as. This is about money and the greed of which they can charge for this energy to be sent at distance is unacceptable. They won’t focus on building solar above parking lots or freeways or other places with plenty of space available for that and far less environmental impact on the planet because those places are often in city’s and therefore they can’t charge as much for the energy created there.

Why should a small town take the brunt of the negative effects risking grater fire hazards and the potential of permanently damaging the water supply in the area?

Mandy McClain

Location: 91905, Boulevard
Submitted At: 10:21am 06-09-26

We are suppose to help slow global warming. This project is 600 acres. It will destroy Native vegetation which consist of Elderberry which the birds and critters need and Yerba Santa which is a Sacred plant to many and the scrub Oak and buckwheat feed the animal . All of which keep the land kool. This is a natural habitat for native animals .. Deer, raccoon, opossum, quail and many more. We should not be Destrouing Gods Creation. It is the only Earth WE have. This does not belong in Boulvard . Go find some large parking lots at Colleges and Malls to put them.
Thank You
Mandy McClain
mmmcclain19@gmail.com

Daniel Herbst
Location: 91906, Campo
Submitted At: 9:43am 06-09-26

I am respectfully requesting a 60-day continuance of the July 12th public hearing conducted by the County of San Diego Planning Commission, in order to provide reasonable due process for county officials and public review of the recently released Final Environmental Impact Report and the long-awaited and critical Battery Energy Storage System (BESS) Plume Study posted on July 1, 2026." I also oppose this extractive project generally as it is taking away from the community ethos and values

Jessica VanArsdale
Location: 91906, Campo
Submitted At: 9:42am 06-09-26

I oppose this project in any form. I'm respectfully requesting a 60 day continuance of the July 12 public hearing conducted by the county of San Diego planning commission, in order to provide reasonable due process for county officials in public review of the recently released final environmental impact report and the long weighted and critical battery energy storage system (BESS) Plumstead posted on July 1, 2026

Erin Western
Location: 92119, San Diego
Submitted At: 9:14am 06-09-26

Please count me as opposed to this potential threat and blight on the pristine Boulevard area. It would be a fire hazard and could open the gateway to other such developments. It is one of San Diego's lovely wilderness areas!

David Berggren
Location: 91905, Boulevard
Submitted At: 8:00am 06-09-26

As a Boulevard homeowner, I respectfully and urgently ask you to deny the Starlight Solar project._

Do not fast-track this massive project while the safety rules are still being written. _

The County of San Diego is actively trying to write new, stricter safety guidelines for Battery Energy Storage Systems (BESS), but they aren't finished yet. Approving an 868 MWh battery installation under incomplete guidelines ignores the County's own ongoing legislative safety process.

It is incredibly reckless to push this through before your own safety standards are enacted. We demand a 60-day continuance on this vote.

Disproportionately siting project after project in our rural backcountry is systematically erasing our community and culture. We are not a dumping ground for industrial energy.

Jewel Valley Road is a total evacuation trap bound by the border wall; a toxic BESS fire will bottleneck residents. Suppressing a multi-day thermal runaway with the current plan is unrealistic.

April Zapor

Location: 91905, Boulevard
Submitted At: 5:57am 06-09-26

I strongly oppose this project for many reasons. Our town is a very peaceful and beautiful town that seems to get dumped on without consideration for those living here. I commute 120 miles round trip daily because I love this town. I don't want to move. This project poses a huge fire risk to all of us here. I request a 60 day continuance be allowed for more time to review.

Vanessa Allen
Location: 91934, Jacumba
Submitted At: 9:41pm 06-08-26

I live and work in Jacumba. Eight miles from the proposed StarLight Solar project, I oppose this project in any form. I respectfully request that there be a 60-day continuance allowed for both the public and policymakers adequate time to review the recently announced FEIR & the Plume Study regarding the effects of the industrial BESS & Solar project.

Kristen Rice
Location:
Submitted At: 9:36pm 06-08-26

I have friends who live on Jewel Valley Rd, and I frequently spend time there enjoying the beautiful natural area surrounding. I have serious concerns about exploiting the people who call this area home and placing this massive solar and battery storage facility in their back yards to meet the energy demands of San Diego, over 50 miles away. Adding to the fire risk in this already high risk zone is unacceptable, particularly as this facility is positioned in a way that a fire would block the evacuation route from the area.

Pamela Haas
Location: 91962-4501, Pine Valley
Submitted At: 9:32pm 06-08-26

I request a 60 day extension for the community to thoroughly review the revised EIR and the plume study. This request stems from the fact that the project's originally stated scope was found to be inaccurate following expert evaluation, and this information was only just disclosed. Ten days is insufficient to adequately review 900 pages. I question why newer and safer battery technology like Na-ion is not being mandated. Sodium-ion batteries offer greater stability and present a lower overall risk.
I ask that the county planner engage with the community to discuss project concerns. The planning group currently lacks necessary answers. The developer only communicates with planning group members, neglecting to respond to community inquiries. His attitude towards the community is antagonistic, leaving us uninformed.
We request establishment of an accountability fund, guaranteeing a reliable water source, property maintenance, cleanup strategy, disaster compensation plan, etc.

Thomas Wall
Location: 91905, boulevard
Submitted At: 9:15pm 06-08-26

am fully opposed to the Starlight Solar Project as currently proposed.

I respectfully request a minimum 60-day postponement of any Planning Commission hearing or decision. The Final EIR and Battery Energy Storage System (BESS) Plume Study were not released until June 1, giving the public insufficient time to review documents that address critical safety concerns.

Significant questions remain regarding fire risk, toxic plume impacts, emergency response, evacuation procedures, and water availability during an emergency. This is not simply a land-use issue—it is a matter of public safety. The potential consequences of a major battery fire could affect the health and safety of local residents, including children, families, seniors, and first responders.

The community deserves adequate time to review these materials and provide informed input before any decision is made. I urge the Commission to grant a 60-day postponement.

Jeff Haas

Location: 91962, pine valley
Submitted At: 8:43pm 06-08-26

I strongly oppose this project and request a minimum 60-day extension to investigate the newly released plume study and EIR.

The proposed lithium battery technology is highly unstable in extreme conditions, requiring extensive climate control. This makes it prone to thermal runaway and unextinguishable fires that release toxic fumes into our air and groundwater.

As this project is 4 years old, why isn't a safer battery chemistry like Sodium-ion (Na-ion) required instead? Na-ion cells have lower energy density and are highly resistant to thermal runaway. They have higher thermal stability and better abuse tolerance, venting gas during failures rather than immediately igniting into flames. Additionally, Na-ion retains 90% charge down to -40°C, and its lower total heat release makes fire propagation to adjacent cells far less severe.

I urge the Planning Commission to mandate safer technology or deny this project entirely to protect our safety and water.

gabriela martinez
Location: 91905, boulevard
Submitted At: 8:24pm 06-08-26

I request a 60 day continuance because of groundwater concerns and toxic plume concerns if BESS catches fire. my grandkids live on Jewel Valley Road

Peggy Hayden
Location: 91905-9729, Boulevard
Submitted At: 8:23pm 06-08-26

I oppose the Starlight Solar project. If and when there is a battery fire are you all prepared for the fire plume to be blown over Interstate 8 and having to clise the Interstate. What happens when a major thoroughfare is no longer accessible. Plus all the life that will be poisoned and destroyed.
Can San Diego afford all the lawsuits that will be filed.

Steve Perelman
Location: 91934, jacumba
Submitted At: 8:07pm 06-08-26

We have not seen a fire hazard report for the BESS materials, or an evacuation plan. That's a big environmental impact. We need a continuance.

Jerry Julian
Location:
Submitted At: 7:57pm 06-08-26

I oppose the Starlight Solar project due to unacceptable fire and evacuation risks that endanger Boulevard residents and children at Clover Flat Elementary School less than a mile away.

The proposed Battery Energy Storage System is located directly beside Jewel Valley Road, the only reliable paved evacuation route for many residents. Lithium battery fires burn for hours, cannot be extinguished with water, and release toxic gases. The project's fire plume modeling used an average wind speed of only 4.5 mph while completely ignoring Santa Ana wind events that regularly exceed 50 mph in Boulevard.

In 2024, a 30 MW SDG&E battery fire in Escondido forced mandatory evacuations. This BESS is more than seven times larger at over 200 MW. Placing a facility of this magnitude next to our primary evacuation route creates a potential death trap for families trying to flee during a fire emergency. I urge you to DENY approval of this project entirely.

Gabe GOLDEN

Location: 91942, La Mesa
Submitted At: 7:52pm 06-08-26

I oppose the Starlight Solar project and urge the Planning Commission to consider the compounding harms it imposes on Boulevard. The proposed 217 MW BESS sits directly beside Jewel Valley Road — our only paved evacuation route — and less than a mile from Clover Flat Elementary. The fire plume modeling ignored Santa Ana winds that regularly exceed 50 mph here. In 2024, a 30 MW battery fire in Escondido forced evacuations; this facility is seven times larger. The EIR claims only 7% impervious surface while ignoring that grading plans require 90–95% soil compaction across hundreds of acres — destroying infiltration, starving our private wells, and creating runoff that demands detention basins and 48-inch stormwater pipes. The project clears 588 acres of habitat within the Peninsular Range transitional zone and draft ECMSCP area — approved during a regulatory gap with no finalized conservation framework in place. I urge you to DENY approval of this project entirely.

Robert Randall
Location: 91934, Jacumba
Submitted At: 7:42pm 06-08-26

Request a 60-day continuance for this June 12th Planning Commission Meeting in order for the public and policy makers to properly review the Plume study and the Final ERI.

Greg Curran
Location: 91934, Jacumba
Submitted At: 7:38pm 06-08-26

Please postpone a 60 day continuance of planning commissioners meeting

John Schultz
Location: 91934, Jacumba
Submitted At: 7:37pm 06-08-26

I would like to kindly request a 60 day continuance for this meeting. 11 days is not a fair amount of time to review this.

Stephanie Michael
Location: 91905, Boulevard
Submitted At: 7:03pm 06-08-26

I strongly oppose the Starlight Battery installation. The environmental impact is irreversible and detrimental. It prevents locals from enjoying the land as it is, creates an additional heat index we can’t afford, and impedes quality of life by destroying the ecosystem we moved here for.

Jamie McCarty
Location: 91905, Boulevard
Submitted At: 6:47pm 06-08-26

I oppose the starlight solar project. I moved to the back country to get away from city life and enjoy the quieter side of San Diego. To put this project in motion in a high fire zone is dangerous to this community. Companies can not guarantee that these projects will not harm the citizens or the wildlife around. The construction for such project will displace wildlife and plants/vegetation in the area which some are endangered or highly watched for the decline in population. How is this allowed for the rights of green energy to hurt the land that so many of us love. Generations of families have lived here all the way to the new comers like my family who just want simple daily lives and not worry about the repercussions that a project like this could have.

Rick McCarty
Location: 91905, Boulevard
Submitted At: 6:39pm 06-08-26

I oppose the starlight solar project. This is not the area to build such hazard in our area. The scar it leaves on our beautiful land and the fire hazard of lithium ion batteries in a high fire zone. I have 25 years experience in fire suppression and I know the dangers of lithium batteries. There is no good way to suppress this class L fire. With thermal runaway of batteries and with water only fuels the fire these are a few of the reasons why oppose I such a project.

Jacquelyn Uribe
Location: 91905, Boulevard
Submitted At: 6:31pm 06-08-26

The Starlight Solar project is a great fire risk, in an area that is considered a high fire zone and extremely windy. Storing lithium batteries in this area is fool-hardy and dangerous. The Starlight Solar project will emit industrial lighting that will turn Boulevard's precious, majestic dark skies into "nighttime smog". This project will damage sensitive and endangered chaparral and destroy the habitat of the native animals. Boulevard is home and destination for San Diegans. It is the back country gem of San Diego. No on Starlight Solar.

Jason Albright
Location: 91906, Campo
Submitted At: 5:33pm 06-08-26

I oppose the Starlight project! To place this facility in the high fire prone area. Would be irresponsible and dangerous for the county to approve. We do not have the emergency services, to control or contain an inevitable fire. The minimal road access would leave residents at risk during an evaluation.

Jessica Rubalcava
Location: 92107, San Diego
Submitted At: 5:29pm 06-08-26

I urge the Planning Commission to deny the Starlight Solar Project.
While I support renewable energy, this project places a 217.4 MW battery energy storage system in a Very High Fire Hazard Severity Zone, creating unacceptable risks for residents, wildlife, and first responders. The potential consequences of a battery fire and resulting evacuation challenges have not been adequately addressed.
I am also concerned about the cumulative impacts of this project when combined with other existing and proposed energy developments in Boulevard and East County. Together, these projects place increasing pressure on wildlife habitat, groundwater resources, and the rural character of our community.
East County should not bear a disproportionate share of the region's energy infrastructure without a full cumulative impact analysis. Please vote NO on the Starlight Solar Project.

Lori Megliola
Location: 92117, San Diego
Submitted At: 5:17pm 06-08-26

I oppose the Starlight Solar project. The 200+ MW BESS sits beside Jewel Valley Road, the only paved evacuation route. Lithium fires burn for hours releasing toxic gases — Escondido's 30 MW fire forced evacuations; this is seven times larger. Clover Flat Elementary is less than a mile away, and the fire modeling ignores Santa Ana winds exceeding 50 mph. The EIR claims only 7% impervious surface while ignoring that grading plans require 90–95% soil compaction across hundreds of acres — crushing permeability and starving the aquifer our wells depend on. The County's own Final EIR identifies aesthetics as "significant and unavoidable" — 588 acres of 12-foot arrays will permanently destroy Boulevard's rural character and dark skies. The site supports 14 sensitive vegetation communities within the Peninsular Range and draft ECMSCP area, approved during a regulatory gap with no finalized habitat protections. Wildlife corridors will be fragmented permanently.

Mindy Maldonado
Location: 91905, Boulevard
Submitted At: 4:23pm 06-08-26

I am a teacher at Clover Flat Elementary school and we are located 1 mile away from this solar/battery project. We are a rural school district called Mountain Empire Unified School District. Residents in Boulevard depend on Wells for drinking water and life. If this project were to go through, our water wells would be ruined by chemicals. Wells will be completely desimated if a battery catches on fire. We also do not have enough fire dept help in case of a fire of this magnitied. People will not be able to evacuate due to only one evacuation route by the solar/battery farm. Students will be in danger of not being saved. Fire occurs often in this very windy area (We often have high winds and electricity must be shut off due to fire danger.). If a fire occurs on this solar farm, people and families will die. The buses to evacuate students from Clover Flat must come from the Bus barn at MEHS in Pine Valley. It is a 30 minute drive to pick up the students attempting to evacuate.

Erika Clemens

Location: 92120, San Diego
Submitted At: 4:20pm 06-08-26

Having visited this area and knowing people who live here, to house a giant battery storage site, affecting the pristine wildlife and lifestyle this community has developed around is unsupportable! The safety hazards to the flora and fauna and potential draining of the aquifer is a hard pass.

Abraham Mena
Location: 91905, BOULEVARD
Submitted At: 3:52pm 06-08-26

I am a land and home owner on 1939 Jewel Valley Road. I request a minimum 60 days continuance of the July 12th public hearing, conducted by the County of San Diego Planning Commission on the Starlight Solar Project being proposed, so that I may be able and the public to review the recent findings of the environmental report and the critical Battery Energy Storage System (BESS) Plume Study posted on July 1, 2026. I personally and very strongly oppose the Starlight Solar Project, due to an insurmountable amount of dangerous and unhealthy repercussions that this community (Boulevard) would have to suffer through for no reason. An industrial sized Solar +BESS project of this magnitude does not belong in a HIGH FIRE risk zone and placed in close proximity to residential homes and lands. Please consider also, without hesitation our natural biodiversity that is enjoyed by all in this community.
Abraham Mena

Abraham Mena

Kristyn Caetano
Location: 91942, San Diego
Submitted At: 3:35pm 06-08-26

I urge the Planning Commission to oppose the Starlight Solar Project.

Key concerns:
• Fire risk from a large battery storage facility in a Very High Fire Hazard Severity Zone.
• Growing cumulative impacts to wildlife, groundwater, and rural character from multiple energy projects in the area.
• Unfair concentration of regional energy infrastructure in East County without adequate cumulative impact analysis.

Please vote no on Starlight Solar.

Melissa Strukel
Location: 91934, Jacumba

Submitted At: 3:34pm 06-08-26

This is a very reckless and negligent plan. It is essentially a death trap for the community who has one way in and out. We all know the fire hazards of projects like this. It is a direct threat to our firefighters and community. What will the reaction be when lives and homes are lost from this?

Deborah Gonzales
Location: 91905, Boulevard
Submitted At: 3:13pm 06-08-26

WE oppose this Mega BESS project because our only source of water will be forever poisoned. This project is going in a area with families across the street, 2 schools. Otay, Moss Landing, Escondido, all on fire.Those projects were built in industrial areas where emergency response is available. Boulevard has nothing equipped to handle a chemical fire with a toxic chemical plume. We are a unincorporated BOULEVARD with no ability to veto. This is going to be a catastrophic environmental incident. Why was our notice for the project posted 14 miles away at Jacumba Library, WHY?;even today people arent aware. Project maps don't show our name we don't have addresses we have PO boxes. We don't have Internet,cellphone service for alerts we're too close to the border There's elderly with no vehicle no communication. I take food to these families We are requesting a postponement of 90/60 days to study the final EIR and plume study Respectfully, Deborah Gonzales Peck site supervisor Feeding SD

Yvonne Mena
Location: 91905, BOULEVARD
Submitted At: 3:06pm 06-08-26

I am a property owner on Jewel Valley Road and I emphatically oppose the Starlight Solar Project. I respectfully request a minimum of 60 days continuance of the July 12 public hearing conducted by the County of San Diego Planning Commission on the Starlight Solar Project beig proposed. I also request the county provide due process for county officials and public review of the recently released Final Environmental Impact Report and the long awaited critical Battery Energy Storage System (BESS) Plume Study posted on July 1, 2026.
Yvonne Mena

Owen Western
Location: 92119-3521, San Diego
Submitted At: 2:52pm 06-08-26

Our county has a wealth of natural beauty in the east county near Boulevard, with its "wonderland" of balanced boulders, rolling hills and unspoiled wilderness. Do not desecrate this wilderness with dangerous construction.

Jeremy Beson
Location: 92009, carlsbad
Submitted At: 2:44pm 06-08-26

I am strongly opposed to the Starlight Solar Project._
Some of my main concerns are as follows...
A 217.4 MW BESS in a Very High Fire Hazard Severity Zone is very unsafe. The Final EIR still does not have an adequate safety plan and the plume study is faulty.

Combined with nearby projects like JVR in Jacumba, and other proposed solar and battery energy storage in Boulevard this corridor faces mounting pressure on wildlife habitat, groundwater, and rural character.
Please reconsider this placement as this beautiful and tranquil desert needs to remain open and wild.

Anthony Neibert
Location: 92040, Lakeside
Submitted At: 2:34pm 06-08-26

I strongly oppose this project! I am demanding a 90 extension of the June 12th Planning Commission hearing to further review both the EIR as well as the recent Plume Study that has only recently been released.

Stacey Sciacchitano
Location: 92115, San Diego

Submitted At: 2:27pm 06-08-26

To the San Diego County Planning Commission and Board of Supervisors, I am writing to express my strong, formal opposition to the proposed 588-acre Starlight Solar and Battery Energy Storage System (BESS) project in Boulevard. While renewable energy is important, placing a massive, industrial-scale facility in a rural residential area threatens our safety, our natural resources, and our community's survival.
I urge you to deny the Major Use Permit for this project based on three critical points of impact: Severe Wildfire and Evacuation Risks; Aquifer Depletion and Water Security;
Destruction of Rural Character and Wildlife. Clearing 588 acres will obliterate native flora, disrupt critical wildlife corridors, and destroy habitats for native fauna. We are the guardians!

Industrial energy projects should not be built at the expense of lives, private property, and delicate ecosystems.

Please protect the residents of Boulevard and stop the Starlight Solar project from moving forward.

Leanne Costantino
Location: 91906, Campo
Submitted At: 1:43pm 06-08-26

I am strongly opposed to the Starlight solar battery storage in Boulevard and Jacumba, California. With this area being a classified level 3 fire risk area through CAL FIRE. It is not suitable for this capacity of solar and battery storage.
I would also request a 90/60 day continuance for the impact study of the EIR / Plume.
I would also make note that there is NO sustainable water source to contain the cooling system for a prevention of temperature over ride and hence a catastrophic endangerment to the community.
I would also request that the committee suggest that the Starlight solar keep up to date radiation records during night time cool down and report findings to the EPA and Cal OSHA.
I also opose foreign funding on BOTH projects.
I would also propose the elimination of property taxes due to the added money that will be generated by both projects.

Melissa Lamoureux
Location: 92101, SAN DIEGO
Submitted At: 1:26pm 06-08-26

I am a property owner on Jewel Valley Road, and I strongly oppose approval of the Starlight Solar Project. This project represents an
inappropriate industrial-scale development in a rural, fire-prone community with limited evacuation infrastructure and insufficient emergency
response capacity. The scale and location of this project creates unacceptable risks to residents, wildlife habitat, and represents a blatant
disregard for the safety, integrity, and long-term well-being of the Boulevard community. The cumulative burden placed on Boulevard-area
communities is unreasonable and inequitable.

As well, I respectfully request that the Planning Commission grant a 90-day continuance of the June 12 hearing on the proposed
Starlight Solar Project. The Boulevard Community Planning Group and the public have not had adequate time to review important project
documents, including the recently released Plume Study Report and Final EIR.

Sincerely, Melissa Lamoureux

Mara Harris
Location: 91905, Boulevard
Submitted At: 12:55pm 06-08-26

I kindly request a 90-day and no shorter than 60-day continuance for the July 12th, San Diego County Commissioners' Meeting in order to provide reasonable & judicious time for community members, policymakers, and fire experts to review the recently released Final EIR and the Plume Study produced for this proposed solar+

lithium battery project.
Although I am a proponent of green energy; I oppose the Starlight Solar Project in any form. A project of this industrial size & scope is irresponsiblely placed in this high fire hazard zone and in proximity to an elementary school and established residence.

Madeleine Hamann
Location: 92117, San Diego
Submitted At: 12:51pm 06-08-26

My primary concern is fire safety. Boulevard is already in a Very High Fire Hazard Severity Zone with limited evacuation routes. Siting a 217.4 MW battery energy storage system here asks a small, rural community to absorb consequences that benefit an entire region — and the project's own battery safety and fire plume analyses aren't even finished yet. That alone should disqualify it from approval.

My second concern is cumulative burden. Boulevard has already been called an "energy sacrifice zone." A large-scale solar and battery project is under construction in Jacumba seven miles away. A second battery project — Desert Jewel — is also proposed for Boulevard. No adequate cumulative impact analysis exists for what this pattern means for a community this size.

I support renewable energy. But repeatedly pointing at the same rural communities and calling it progress isn't a policy — it's a pattern worth opposing.

Please vote NO.

Respectfully,
Madeleine Hamann
San Diego Business Owner

Kyra Jenkins
Location: 92109, San Diego
Submitted At: 12:06pm 06-08-26

I urge the Planning Commission to oppose the Starlight Solar Project.
My concerns include:
• Fire Safety: The proposed 217.4 MW Battery Energy Storage System (BESS) would be located in a Very High Fire Hazard Severity Zone. Battery fires can be difficult to extinguish, may burn for days, and can release toxic gases. The Final EIR still lacks an adequate safety and emergency response plan.
• Cumulative Impacts: Combined with existing and proposed solar and battery projects in Boulevard and Jacumba, Starlight would increase impacts on wildlife habitat, groundwater resources, and the rural character of East County.
• Environmental Justice: Boulevard residents should not bear a disproportionate share of the region’s industrial energy infrastructure without a full cumulative impact analysis.
• Habitat Loss: The project would convert open space into industrial development, fragment wildlife habitat, and permanently alter scenic rural landscapes.
Please vote NO on the Starlight Solar Project.

Patti Spencer
Location: 92916, Descanso
Submitted At: 12:03pm 06-08-26

Please, Please, Please DO NOT approve the battery storage unit & solar farm for Jacumba/Blvd. Area. Our back country is always a tender box. It is NOT safe to to build that project there!! I have helped evacuate friends & animals there too many times already!! Don't be short sighted & create a frightening dangerous situation in our beautiful back country.

Jyotsna Joshi
Location: 91361, Westlake Village
Submitted At: 12:02pm 06-08-26

Please STOP the massive 588-acre battery energy storage system and solar project, Starlight Solar. Beyond

ruining the rural peace and beautiful land we all enjoy, it poses a serious safety threat of a major battery fire and may deplete the aquifer that our wells rely on. It will also have a negative impact on native flora and fauna. So please STOP this project from moving forward! Thank you.

Lauren Robertson
Location: 92104, San Diego
Submitted At: 12:01pm 06-08-26

This is important land for the community and large solar projects should be remote from homes and businesses to prevent possible threats to the community with battery safety or lack there of. There are natural wells that need protection with drought and this would directly threaten them. This project needs to be moved away from the Boulevard community. This is a very important historic area of Southern California

M Betty
Location: 91941, La mesa
Submitted At: 11:54am 06-08-26

I strongly oppose this initiative. Aside from wrecking the rural peace and beautiful land of the area, it poses serious safety threat of major battery fires in an area known for high winds, and limited egress routes. In addition, it will likely deplete the aquifer on which that local wells rely. The logistics of transporting energy from that distance back to the more highly populated areas, also make this project energy-inefficient.

Cheryl Harper
Location: 92252, Joshua Tree
Submitted At: 11:54am 06-08-26

My big concern is the area you are placing the battery storage. This is a high fire district. You are putting lives in danger!

Becky Pacheco
Location: 91905, Boulevard
Submitted At: 11:50am 06-08-26

We oppose this project as it endangers wildlife and fire safety as well as the health of our community

Pamela Guy
Location:
Submitted At: 11:48am 06-08-26

Boulevard has already been destroyed by the turbine's.
Everyday I deal with the bourse and blinking lights. Now you want to destroy the south side of Boulevard.
I live here for the country quiet.
That is being destroyed it does not help our community in anyway.
Why don’t you give solar for people’s houses instead of making the rich richer and our communities in the back country get destroyed.

Cat Schulz
Location: us, 92024-2060, Encinitas
Submitted At: 11:45am 06-08-26

I respectfully oppose approval of the Starlight Solar project and its proposed 588-acre battery energy storage facility in Boulevard.

This project would dramatically alter the rural character, open spaces, and scenic landscape that make our community unique. Many residents chose to live here because of the area’s quiet, natural environment, which this industrial-scale development would permanently impact.

I am also concerned about the potential safety risks associated with large battery storage facilities, including the possibility of battery fires and the challenges of emergency response in a rural area. Additionally, questions remain about the project’s potential effects on local groundwater resources and the aquifer that many residents depend on for their wells.

Given these concerns, I urge the County to deny approval of the Starlight Solar project or, at a minimum, require a more thorough evaluation of its long-term impacts on the community, public safety, and water resources.

Lesa Richmond
Location: 91905, Boulevard
Submitted At: 11:20am 06-08-26

I am extremely opposed to this project! It will create an eyesore in our community. It's a fire danger as well as a health and environmental danger. If you would not put it in your backyard than don't put it in ours!

Cynthia Neibert
Location: 91910, Chula vista
Submitted At: 7:46pm 06-07-26

I strongly oppose this project. I also am requesting a 90 day extension in order for further investigation of the recently released EIR and Plume study

Johnathon Neibert
Location: 91962, Pine Valley
Submitted At: 7:32pm 06-07-26

I strongly oppose the project. I am requesting a 90 extension for further investigation of the alarming plume study and EIR.

Marc Guerra
Location: 91905, Boulevard
Submitted At: 5:45pm 06-07-26

I respectfully request that the Planning Commission grant a 90-day continuance of the June 12 hearing on the proposed Starlight Solar Project. The Boulevard Community Planning Group and the public have not had adequate time to review important project documents, including the Plume Study Report released on June 2 and the recently released Final EIR.

My wife and I recently purchased property in Boulevard and have plans currently under review by San Diego County to build our future home off Jewel Valley Road, drawn to the area's rural character, natural beauty, and peaceful environment.

I am particularly concerned about the proposed project's location in an area known for extreme wildfire danger, high winds, and limited evacuation routes. The placement of a large-scale solar and battery energy storage facility in these conditions warrants careful review and public scrutiny.

Thank you for your consideration.

Kristen Miller
Location: 91906, Campo
Submitted At: 5:14pm 06-07-26

I strongly oppose this project and respectfully request a ninety day extension of the planning commission meeting set to be held on June twelve , until further investigation of the recently and alarming plume study period

Lawrence Johnson
Location: 91910, Chula vista
Submitted At: 5:06pm 06-07-26

I strongly oppose this project and respectfully request a ninety day extension of the planning commission meeting set to be held on June twelve , until further investigation of the recently and alarming plume study period

Lawrence Johnson
Location: 91910, Chula vista
Submitted At: 5:06pm 06-07-26

I strongly oppose this project and respectfully request a ninety day extension of the planning commission meeting set to be held on June twelve , until further investigation of the recently and alarming plume study period

Lorin Matia
Location: 91905, Boulevard
Submitted At: 3:30pm 06-07-26

I do not like what is going on in my area I did not receive anything in the mail about this I am a property owner this plan is a danger to our health safety I am 77 years old disabled person

Heidi Kohz
Location: 60612, Chicago
Submitted At: 1:13pm 06-07-26

Although I'm not a resident, I am a frequent tourist (6+ times a year) and my money supports the area. The preservation of the natural environment, and the health and wellbeing of the residents here is priority to me. I adamantly oppose the starlight solar plus battery project of this industrial size. It's inappropriate for such a high-fire zone, and a high risk for groundwater contamination. I'm an advocate of green energy, but I oppose in areas where it's in such close proximity to so many residents and minimal emergency resources (fire department, urgent care or hospitals.

With the final EIR being published along with the plume fire study out for review, this community along with county experts need a minimum of 90 days to review. I respectfully request a continuance for the San Diego County Planning Commissioners meeting.

I will be contacting my state representatives in regards to this greater environmentl impact across the United States and its electricity needs. I am

Becca Berggren
Location: 92107, San Diego
Submitted At: 9:05am 06-07-26

As a Boulevard homeowner I urge you to oppose this MUP. I also request a 60-day continuance to review the Final EIR. Rushing this process denies the public time to analyze the risks.
1. Fire Risk & Faulty Modeling: A 217.4 MW BESS in a Very High Fire Hazard Severity Zone is unsafe. The County is actively revising BESS guidelines & the EIR relies on a faulty plume study.
2. Aquifer Disruption: The EIR's claim of 7% impervious land ignores massive terracing requiring 90% to 95% soil compaction under County Ordinance. This destroys natural infiltration. Our backcountry homes rely entirely on private wells drawing from an aquifer; starving recharge threatens our water supply.
3. Economic & Siting Inequity: East County is treated as a "sacrifice zone," placing an unfair cumulative burden on rural residents. This high-risk industrial footprint threatens to plummet our property values & trigger fire insurance cancellations.

Please grant a continuance or reject the MUP.

Trudi Neibert
Location: 92040, Lakeside
Submitted At: 6:02pm 06-06-26

I strongly oppose this project. I I'm also asking for a 90-day extension so that we the people may further investigate the newly released plume study as well as the EIR

Steve Bolinger
Location: 91905, Boulevard
Submitted At: 4:40pm 06-06-26

This project is not good for the environment, community or the future of this community. Fire and environmental hazard full of toxic materials. We need a 60 day continuous from the June 12th commissioners meeting.

joel esquivel
Location: 91905, Boulevard
Submitted At: 4:14pm 06-06-26

As a homeowner in Boulevard and a resident on Jewel Valley Road, I oppose any version of this project. My opposition is because this is a high fire risk and high winds area and therefore an industrial sized battery + solar

project has no place in this high fire risk region.

I am requesting to the Planning Commissioners, a 90-day continuance for the June 12th Planning Commissioners Meeting, to be granted to the Boulevard Community Planning Committee, in order to allow this local committee to review the Plume Study Report released on June 2nd and the recently released EIR.

Patricia Smith
Location: 91905, BOULEVARD
Submitted At: 3:50pm 06-06-26

I am opposed to the Starlight Solar project and requestong a 90 day extension to the planning commision meeting set for June 12th for further Plume study and the EIR

LinLin Hu
Location: 91901, Alpine
Submitted At: 3:47pm 06-06-26

I want at least 90 days extension in regards to the June 12th planning commissioners meeting. I oppose this projects in any form. Also how come this kinds of projects don't stay in the cities where the electricity is being provided there? All the shopping malls parking lots can be used for that purpose and the nature can stay nature.

Karen Parker
Location: 91905, Boulevard
Submitted At: 3:38pm 06-06-26

We need ninety days to review the newly released plume study + the epi report. That's ninety days to review approx 900 pages of material. This project must not go fwd without the consent of the community. 43% of the community was not informed nor had representation. We need ninety days to review. You work for us.

Antonette Fusco
Location: 91901, Alpine
Submitted At: 3:35pm 06-06-26

I am not fooled by the uselessness of this project.
Shame on you. This project in its scope is a lethal threat to the high fire danger zone of the Boulevard area.

I am requesting that the June 12th Planning Commission Meeting be postponed and the local Boulevard Community Planning Committee be given a 90-day continuance to review the currently released EIR and the Plume Study release June 2nd, 2026.

Gabriela Esquivel
Location: 91905, Boulevard
Submitted At: 3:06pm 06-06-26

This email is to request that the San Diego Planning Commision Meeting schedule for June 12th, 2026 is postponed to allow the local community planning committee and extension of 60 days. This extension will allow time to review the EIR and the alarming plume study. Your consideration and support is greatly appreciated.

Marjorie StClair
Location: 92117, San Diego
Submitted At: 2:09pm 06-06-26

No on Starlight Solar! Boulevard should not be a dumping ground for big industrial projects. San Diego's back country should be preserved. It has already done its part in helping promote renewable energy, i.e., wind turbines, solar panels in Campo, etc. We need to cherish, protect and support the precious chaparral and open land spaces we have left in Boulevard and east county's back country. No on more damaging big infrastructure.

Dan Silver
Location:

Submitted At: 1:17pm 06-06-26

Endangered Habitats League supports this project as a necessary component of a transition to renewal energy and notes the mitigation of biological impacts.

Gabrielle Schultz
Location: 91934 , Jacumba
Submitted At: 11:19am 06-06-26

I am a neighbor of Boulevard and I kindly demand for a 60 day continuance for the June 12 th Planning commission meeting.
I strongly oppose any version of this project. It is an unsafe for all residents within 20 miles of a chemical fire.

Eugenia Gomez
Location: 91905, SAN DIEGO
Submitted At: 11:12am 06-06-26

No thank you

Misha Anderson
Location: 91905
Submitted At: 4:11pm 06-05-26

Please vote no on the starlight solar project for Boulevard, San Diego. Besides the many legitimate concerns about high fire risk and disturbing natural wild life, the infrastructure of the back country cannot support the installation of this project. The amount of water required to install and run the project is more than our aquifer can maintain. The soil and groundwater contamination is a serious concern as well. Our community will be negatively impacted by the installation of this project and I fear many people will lose their ability to live in the area due to a lack of water and dried up wells. We live in the back country because we like the piece and quiet and we can’t afford to live anywhere else. Please don’t make living harder on our community.

Arturo Uribe
Location: 91905, Boulevard
Submitted At: 7:10pm 06-03-26

I urge you to vote NO on the Starlight Solar Project. This project will destroy our chapparal plants and habitats for the native animals. The herbicides used to clear the land will leak into our aquifer and poison the drinking water. Aquifers are vulnerable to contamination from surface pollutants. The fire danger is great. The proposed storage for lithium batteries is dangerous and reckless in Boulevard. Vote NO on Starlight Solar!

From: Loretta Simon
To: LUEG, PDS.PlanningCommission
Subject: [External]
Date: Monday, June 8, 2026 3:34:31 PM

Dear San Diego County Planning Department,

I respectfully request a 60-day continuance of the Starlight Solar Project hearing currently scheduled for June 12, 2026.

The Final Environmental Impact Report (FEIR) and Battery Energy Storage System (BESS) Plume Study were only made publicly available on June 1, leaving residents and stakeholders with insufficient time to review these highly technical documents before the hearing.

Given that this project includes one of the largest battery storage facilities proposed in California, and that the findings directly relate to human health, human safety, emergency response, and potential impacts to our community, it is reasonable and necessary to allow the public adequate time to thoroughly review the information and seek expert input.

A 60-day extension would support meaningful public participation and help ensure that decisions affecting the safety and well-being of our community are made with the benefit of a complete and informed review.

Thank you for your consideration.

Sincerely,

Loretta Simon

JBRA

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ENVIRONMENTAL CONSULTANTS
Sound Science. Creative Solutions.®

3838 Camino Del Rio North, Suite 220
San Diego, California 92108
Tel 619.320.1450
www.swca.com

May 27, 2026

Nick Koutoufidis
Land Use & Environmental Planner
County of San Diego | Planning & Development Services

5510 Overland Avenue
Suite 210
San Diego, California 92123

Re: Responses to Starlight Solar Fire Safety Comment Letters Received After the Close of the Public Review Period for the Draft Environmental Impact Report

Dear Mr. Koutoufidis:

On behalf of Chris Fahey and Starlight Solar LLC, SWCA Incorporated, dba SWCA Environmental Consultants (SWCA) has produced the following letter for submittal into the public administrative record for the Starlight Solar Project (project). This letter contains responses to three comment letters that were received after the close of the public review period of the Draft Environmental Impact Report (Draft EIR) for the project, which occurred from July 31, 2025 to September 15, 2025 (refer to Table 1).

Table 1. Comment Letters Received After Close of Public Review Period

Respondent	Contact Information
Thomas Wall; on behalf of Jeffrey Osborne Letter dated: March 12, 2026	Email: rememberthomaswall@gmail.com
Thomas Wall; on behalf of Adam Robledo Letter dated: March 12, 2026	Email: rememberthomaswall@gmail.com
Thomas Wall; on behalf of the Boulevard Community Impact Committee Letter dated: March 23, 2026	Email: rememberthomaswall@gmail.com

RESPONSE TO THE LATE COMMENT LETTER #1 FROM THOMAS WALL ON BEHALF OF JEFFREY OSBORNE DATED MARCH 12, 2026

1. The commenter notes in the Executive Summary that the project is located in a Very High Fire Hazard Severity Zone, within one mile of a school, and 39 miles or more from the nearest hospital.

   These conditions are fully disclosed and analyzed in the Draft Environmental Impact Report (Draft EIR) in Section 2.7 (Wildfire) and Section 3.1.8 (Public Services). The commenter fails to mention the presence of multiple health care providers, smaller than major hospitals, which are

located much closer to the Starlight Solar Project (project) site. For projects located in a California Department of Forestry and Fire Protection (CAL FIRE)-designated High or Very High Fire Hazard Severity Zone, the County of San Diego (County) requires the preparation of a Fire Protection Plan (FPP) to be evaluated concurrently with the Environmental Impact Report (EIR). The Draft EIR states that the FPP was accepted by the San Diego County Fire Protection District (SDCFPD) in February 2024, and the project would adhere to the recommendations of the FPP and would comply with applicable fire codes. (Section 2.7.3.1). The FPP provides fire behavior modeling using the Interagency Fuels Treatment Decision Support System (IFTDSS) application, including site-specific on-site and off-site fuels and terrain under worst case-scenario conditions. As stated in the Draft EIR, implementation of Mitigation Measures M-WF-1 through M-WF-6 reduce the risk of exacerbated wildfires to a less-than-significant level. (Section 2.7.7.2). Additionally, while the commenter claims the project site is located in a Very High Fire Hazard Severity Zone, the most recent CAL FIRE Fire Hazard Severity Zone Viewer shows that the project is actually located in a High Fire Hazard Severity Zone (CAL FIRE 2026; see Figure 2.7-1 in the Draft EIR).

2. The commenter alleges in the Executive Summary that certain analysis is preliminary, that appendices in the Draft Environmental Impact Report lack technology-specific information related to the Wartsila Lithium Iron Phosphate batteries, that project emergency contacts are to-be -determined, that the National Fire Protection Association 551 Fire Risk Analysis is an unfilled placeholder, and that a table heading in an appendix contains an erroneous title.

   We disagree that the Draft EIR fire risk analysis is insufficient. Under the California Environmental Quality Act (CEQA), insubstantial or merely technical omissions in an EIR are not grounds for relief. When assessing the legal sufficiency of an EIR, Courts do not look for perfection, but "adequacy, completeness, and a good faith effort at full disclosure." (CEQA Guidelines Section 15151; South of Market Community Action Network v. City and County of San Francisco (2019) 33 Cal.App.5th 321, 334). Here, the Draft EIR includes extensive technical evaluation of battery energy storage system (BESS)-related fire risks through multiple studies, including: the Preliminary Battery Energy Storage System National Fire Protection Association (NFPA) 551 Fire Risk Assessment and Heat Flux Analysis (Appendix O.1); Preliminary Battery Energy Storage System International Electrotechnical Commission (IEC) 60812 Failure Mode and Effects Analysis (Appendix O.2); Preliminary Balance of Plant NFPA 551 Fire Risk Assessment (Appendix O.3); Preliminary Balance of Plant IEC 60812 Failure Mode and Effects Analysis (Appendix O.4); Preliminary Balance of Plant Hazard Mitigation Analysis (Appendix O.5); and Preliminary First Responders Guide (Appendix O.6). (Draft EIR Section 2.7). These analyses use conservative assumptions and industry-standard methodologies to demonstrate that worst-case BESS fire risks are adequately mitigated. Specifically, Appendix O.1 evaluates the "fire risk associated with the thermal runaway of an original equipment manufacturer (OEM) agnostic Lithium-Iron Phosphate (LFP) based energy storage system (ESS)." (p.5). The potential environmental impacts associated with BESS fire risks are fully disclosed in accordance with CEQA Guidelines Section 15151. Additionally, a plume analysis to further confirm safe operation of the BESS has been prepared to provide additional technical details for use by the County (Hazard Dynamics 2026; Appendix O.7 to the Final EIR). The plume analysis simulated a variety of fire and wind scenarios, including large fire and 99th percentile wind speed scenarios, using Fire Dynamics Simulator (FDS) software developed by the National Institute of Standards and Technology (NIST). The modeling estimated the downwind dispersion of toxic gases, including carbon monoxide, sulfur dioxide, and hydrogen fluoride, at two meters above ground level. Results from the plume analysis indicate that, even under worst-case scenario conditions, Immediately Dangerous to Life and Health (IDLH), Acute Exposure Guideline Level (AEGL)-3, and AEGL-2 levels of toxic gases would be confined to within 110 feet of the source. The

maximum modeled distance for AEGL-1 toxic gases was 305 feet from the source. In other words, the dispersion of toxic gases at IDLH and AEGL values even under worst case conditions would be entirely within the project boundary. The plume analysis confirms the existing analysis in the Draft EIR and does not provide any new information of substantial importance that would change the significant effects analysis in the Draft EIR or otherwise require recirculation of the Draft EIR under CEQA. Regarding potential omission of project emergency contacts numbers and erroneous document headings, insubstantial or merely technical omissions are not grounds for relief. Here, none of the omissions cited affect the adequacy, completeness, or full disclosure of the EIR. Regarding the lack of manufacturer specific information related to the Wartsila LFP batteries, CEQA requires a general description of the "main features" of the project and does not require "all of the details or particulars." Dry Creek Citizens Coalition v. County of Tulare (1999) 70 Cal.App.4th 20, 26.

As required by the Draft EIR, prior to issuance of building permits, the Applicant shall submit final BESS design specifications demonstrating compliance with NFPA 855, California Fire Code Section 1207, and all applicable County fire requirements. Final design shall be consistent with, or more protective than, the worst-case scenarios evaluated in the EIR technical appendices.

3. The commenter notes in the Executive Summary that local fire stations have no documented Battery Energy Storage System-specific training or equipment and that such training is not mandated by any mitigation measure.

   We disagree that the Draft EIR fire analysis and associated mitigation measures are insufficient. The Draft EIR includes Mitigation Measure M-WF-6, which specifies that the Applicant shall enter into a Fire Protection and Mitigation Agreement with the SDCFPD prior to approval of a Major Use Permit to make a fair share contribution toward local emergency response capabilities. Based on the final draft Fire Services Agreement included with the Draft EIR, it is anticipated that the Project, at buildout, will pay a total of approximately $1 million toward capital improvements and more than $100,000 annually for ongoing operations. (See Draft EIR Appendix P, p. 2-3). The funding [JW1.1][MA1.2]shall be used by the SDCFPD to mitigate risks of wildfires and to enhance fire suppression and emergency services capabilities for the proposed project and the southeast portion of County Service Area (CSA) 135. (Section 2.7.6.1). Additionally, the First Responders Guide (Appendix O.6) provides emergency procedures and hazard identification, communication protocols and coordination structure, evacuation routes and staging areas. The Draft EIR concludes that emergency response capability is adequate and that impacts related to emergency response, emergency evacuation, and Safety Element of the County General Plan conflicts would be less than significant. (Section 2.7.7.1).

   It should be noted that County Fire standard practices address battery equipment fires, as well as other fires, such as those within wildland vegetation.

4. The commenter states in the Executive Summary that the Draft Environmental Impact Report does not provide an adequate suppression solution because the Draft Environmental Impact Report admits there is no extinguishment solution.

   We disagree that the Draft EIR fire risk analysis is insufficient. The Draft EIR provides that each BESS shall have an internal aerosol suppression system that is regularly tested and maintained. Appendix O.1 addresses impacts associated with suppression and thermal runaway: "Propagation of LFP cell thermal runaway has significant implications for fire suppression and fire protection. Lithium-ion batteries (LIB) in exothermic reactions self-generate oxygen to sustain the fire. A fire suppressant or low oxygen environment may extinguish flames from a battery pack, but the thermal runaway reaction will propagate if heat is not sufficiently removed from the adjacent

cells." (p. 18). The suppression system is not meant to extinguish all BESS fires under every possible circumstance. CEQA provides that the "sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible." (CEQA Guidelines Section 15151). Here, the Draft EIR fully discloses potential fire suppression measures and concludes that the "implementation of Mitigation Measures M-WF-1 through M-WF-6 would reduce the risk of exacerbated wildfires to a less-than-significant level" (Section 2.7.7.2). CEQA does not require the adoption of infeasible mitigation measures.

It should be noted that the batteries are distributed within the site instead of being concentrated in one area. Further, the Applicant has committed to the use of lithium iron phosphate batteries, which reduces the risk of runaway fire. Leading edge technical analysis indicates that the distance of the batteries from the nearest property is in all cases at least 1,200 feet from homes, over 12 times the 100 feet minimum requirement for safety. Further, a plume analysis to further confirm safe operation of the BESS has been prepared to provide additional technical details for use by the County. The plume analysis provides additional technical details regarding thermal runaway, toxic gas release, and cascading fire events, among other considerations. The plume analysis confirms the existing analysis in the Draft EIR and does not provide any new information of substantial importance that would change the significant effects analysis in the Draft EIR or otherwise require recirculation of the DEIR under CEQA.

5. The commenter states in the Executive Summary that there is no community evacuation plan or school evacuation protocol and asserts that there is no plume analysis or plume response plan. The commenter also states that the Battery Energy Storage System is sited at the north end of the only community evacuation route, adjacent to the identified evacuation route on Tierra del Sol Road, which presents a dual-access conflict between evacuees and emergency responders. The commenter also presents concerns related to plume and prevailing winds.

   We disagree that the project's evacuation analysis is inadequate. Regarding evacuation route adequacy, Appendix L (Fire Protection Plan) states: "Jewel Valley Road and Tule Jim Lane are the main routes to the town of Boulevard (Appendices B and C). Jewel Valley Road is paved in certain segments and is otherwise a flat, well-maintained dirt road. Tule Jim Lane is also a non-mountainous, well-maintained dirt road. Both roads are wide enough to accommodate two-way traffic of emergency vehicles and evacuees and connect to Old Highway 80 in the town of Boulevard." (p. 48). Section 2.7 of the Draft EIR states: "Although the proposed project includes a BESS that could result in an increased demand for emergency services in the area in the unlikely event of a battery fire, the project would be generally unoccupied and would not congest roadways such that response times would be delayed. Therefore, the project would result in a less-than-significant impact related to impairing implementation of an adopted emergency response or evacuation plan or conflicts with the Safety Element of the General Plan." (Section 2.7.5.1). The Draft EIR states that "impacts related to emergency response, emergency evacuation, and Safety Element of the County General Plan conflicts would be less than significant." (Section 2.7.7.1).

   Here, the commenter does not provide sufficient information to support its speculative assertion that Tierra del Sol Road would be rendered impassable by a BESS fire. Even in a worst-case thermal runaway scenario, toxic gases are transported above the affected batteries by a rising, buoyant plume, which will entrain air to dilute the gases in the plume. Rising even a short distance (10 meters) will result in a substantial decline in the concentration of gases to reduce the toxicity of released gases in an unenclosed scenario. The gases will move horizontally as a result of wind and will be further diluted as they move in the downwind direction. (see Fire & Risk Alliance Study, p. 35, available online at https://www.psc.nd.gov/webdocs/case/24-0371/042-

010.pdf). A project-specific plume analysis to further confirm safe operation of the BESS has been prepared to provide additional technical details for use by the County (Hazard Dynamics 2026; Appendix O.7 to the Final EIR). The plume analysis simulated a variety of fire and wind scenarios, including large fire and 99th percentile wind speed scenarios, using FDS software developed by the NIST. The modeling estimated the downwind dispersion of toxic gases, including carbon monoxide, sulfur dioxide, and hydrogen fluoride, at two meters above ground level. Results from the plume analysis indicate that, even under worst-case scenario conditions, IDLH, AEGL-3, and AEGL-2 levels of toxic gases would be confined to within 110 feet of the source. The maximum distance for AEGL-1 toxic gases would be 305 feet from the source. In other words, the dispersion of toxic gases at IDLH and AEGL values even under worst case conditions would be entirely within the project boundary. The plume analysis confirms the existing analysis in the Draft EIR and does not provide any new information of substantial importance that would change the significant effects analysis in the Draft EIR or otherwise require recirculation of the DEIR under CEQA. The plume analysis confirms the existing analysis in the Draft EIR and does not provide any new information of substantial importance that would change the significant effects analysis in the Draft EIR or otherwise require recirculation of the DEIR under CEQA.

Here, the commenter does not provide any information to substantiate how a plume associated with a fire more than 2 miles from Tierra del Sol Road would conflict with County emergency response and evacuation plans. Under CEQA, indirect impacts that are speculative or unlikely to occur are not reasonably foreseeable and need not be considered. (CEQA Guidelines Section 15064(d)(3)). Additionally, CEQA does not require the adoption of mitigation measures for impacts that are less than significant. (Public Resources Code (PRC) Section 21002.1(a)).

6. The commenter asserts in the Executive Summary that the Draft Environmental Impact Report safety analyses are inadequate because they were prepared by the developer's consultant and not subject to independent verification.

   We disagree that the Draft EIR safety analyses are insufficient. CEQA requires that the lead agency must subject the Draft EIR to the agency's own review where a draft is prepared by another person, and that the lead agency is responsible for the adequacy and objectivity of the DEIR. (CEQA Guidelines Section 15084(e)). CEQA provides that the lead agency may require the project applicant to supply data and information both to determine whether the project may have a significant effect on the environment and to assist the lead agency in preparing the DEIR. (Id. at 15084(b)).

7. The commenter summarizes project scale and location information in Section 2.1.

   The commenter asserts that on-site emergency support is available only Monday-Friday from 7 AM to 5 PM per Appendix O.6. However, the Draft EIR notes that multiple emergency responders, including SDCFPD and CAL FIRE stations, are located within 5 miles from the project site and adequately staffed for incident response over a twenty-four-hour period. The remainder of the information presented in Section 2.1 is summary information, which does not raise significant environmental issues. Therefore, no further response is warranted. (CEQA Guidelines Section 15204(a)).

8. In Section 2.2, the commenter lists a number of toxic gases that may be emitted from a Lithium Iron Phosphate battery undergoing thermal runaway and their potential associated health effects. The commenter notes that Phosphoryl Fluoride was not included in the plume dispersion model. The commenter also notes that the plume dispersion modeling covers only a four-cell failure

scenario and references a different container manufacturer from the proposed system. The commenter notes that no large-scale plume modeling has been performed.

We disagree that the plume analysis is insufficient. CEQA does not require a lead agency to perform all research or study recommended or demanded by commentors. (CEQA Guidelines Section 15204(a)). Nonetheless, Appendix O.6 thoroughly addresses toxic gases that can be released during Lithium-ion battery fires, including Phosphoryl Fluoride (POF_3). Appendix O.6 states that the complex mixture of flammable and toxic gases emitted from the thermal decomposition of LIB is chemistry dependent, that the composite breakdown of particles is a function of the size of the energy source and the inherent design chemistry that can only be estimated, and that the list of potentially flammable and toxic gases included in the plume analysis is therefore "theoretical." (p. 29). The Larsson study cited in Appendix O.6 notes that hydrogen fluoride (HF) is generated in significantly higher quantities (20-200 milligrams per watt-hour (mg/Wh)) compared to POF_3 (15-22 mg/Wh), and that POF_3 was found only in one of the cell types and only at 0% state of charge. (link).

Regarding the commenter's assertion that the four-cell failure analysis is insufficient and that a large-scale plume analysis is required, CEQA does not require analysis of impacts that are too speculative for evaluation. (CEQA Guidelines Section 15145). Appendix O.6 notes that when battery modules are equipped with cascading protections, the cell failure rate may be randomized and scattered. (p. 27). Modern BESS facilities are engineered with advanced safety features, including thermal detection capabilities and suppression systems designed to prevent a single cell failure from cascading into a full container fire. Mitigation Measure M-WF-3 requires that each BESS shall be enclosed, have automatic internal heat detecting systems linked to an inert gas system, and have an internal aerosol suppression system that is regularly tested and maintained. (Section 2.7.6.1). Therefore, modeling a full container fire may be deemed speculative or too improbable to be considered a reasonable worst-case scenario. Additionally, the commenter notes the HF concentration produced in the four-cell scenario. Appendix O.6 addresses the maximum extent of the plume envelope in the four-cell scenario and takes that into consideration in its calculation of Minimum Approach Distance. (p. 30-31).

Finally, regarding the commenter's assertion that the exact battery container manufacturer must be named in the reference studies relied upon in the fire risk analysis, CEQA requires a general description of the "main features" of the project and does not require "all of the details or particulars." (Dry Creek Citizens Coalition v. County of Tulare (1999) 70 Cal.App.4th 20, 26). The project description "should not supply extensive detail beyond that needed for evaluation and review of the environmental impact." (CEQA Guidelines Section 15124). Section 1.4.1.5 of the Draft EIR (Project Description) provides extensive information about the main features of the BESS, including the storage capacity, the cabinet dimensions, the battery type ("high-density, lithium iron phosphate or other types with an equivalent or higher level of safety"), and fire protection information. The commenter provides no evidence to indicate why this project description is insufficient or why the reference studies cited in the analysis must name the specific equipment manufacturer for the County to be fully informed of potential environmental impacts. The Draft EIR's project description and fire risk analyses provide sufficient information to enable the County to make an informed decision that intelligently takes account of environmental consequences. (Dry Creek Citizens Coalition v. County of Tulare (1999) 70 Cal.App.4th 20, 26).

An additional plume analysis to further confirm safe operation of the BESS has been prepared to provide additional technical details for use by the County (Hazard Dynamics 2026; Appendix O.7 to the Final EIR). The plume analysis simulated a variety of fire and wind scenarios, including

large fire and 99th percentile wind speed scenarios, using Fire Dynamics Simulator (FDS) software developed by the National Institute of Standards and Technology (NIST). The modeling estimated the downwind dispersion of toxic gases, including carbon monoxide, sulfur dioxide, and hydrogen fluoride, at two meters above ground level. Results from the plume analysis indicate that, even under worst-case scenario conditions, IDLH, AEGL-3, and AEGL-2 levels of toxic gases would be confined to within 110 feet of the source. The maximum distance for AEGL-1 toxic gases was 305 feet from the source. In other words, the dispersion of toxic gases at IDLH and AEGL values even under worst case conditions would be entirely within the project boundary. The plume analysis confirms the existing analysis in the Draft EIR and does not provide any new information of substantial importance that would change the significant effects analysis in the Draft EIR or otherwise require recirculation of the DEIR under CEQA. The supplemental plume analysis confirms the existing analysis in the Draft EIR and does not provide any new information of substantial importance that would change the significant effects analysis in the Draft EIR or otherwise require recirculation of the DEIR under CEQA.

9. The commenter quotes language from the Draft Environmental Impact Report appendices in Section 2.3, which the commenter describes as "Key Admissions."

   The commenter does not raise any significant environmental issues beyond what is already addressed in the Draft EIR. Therefore, no further response is warranted. (CEQA Guidelines Section 15204(a)).

10. In Section 2.4, the commenter asserts that the technical appendices include preliminary or incomplete fire risk information and do not reference the specific Battery Energy Storage System technology to be installed. Specifically, the commenter asserts that the National Fire Protection Association 551 Fire Risk Analysis has not been performed and that key terms are not specified in the Fire Services Agreement.

    See Comment Response #2. We disagree that the risk analysis is insufficient due to preliminary or incomplete information, including the NFPA 551 analysis. CEQA does not require that an agency conduct every recommended test and perform all recommended research in evaluating a project's environmental impacts. (CEQA Guidelines Section 15204(a)). Further, an agency need not wait for completion of plans or studies in progress that might provide additional information before completing an EIR. (King & Gardiner Farms, LLC v. County of Kern (2020) 45 Cal.App.5th 814, 845). Here, given the detailed information provided in the Draft EIR, the existing risk analysis is sufficient to assess significant environmental impacts without the additional information.

11. In Section 2.4, the commenter alleges that Mitigation Measure M-WF-6 is vague because it requires fair share contribution with no specific dollar amount, training requirements, equipment list, or performance standard.

    We disagree with the commenter's assertion that the mitigation measure is impermissibly vague. Mitigation Measure M-WF-6 requires, as a condition of approval, that the Applicant enter into a binding Fire Protection and Mitigation Agreement with the SDCFPD and provide a fair-share contribution to ensure adequate fire protection services. This measure establishes a clear and enforceable performance standard while appropriately delegating implementation details to the agency with jurisdiction and technical expertise. A mitigation performance standard is sufficient if it identifies specific criteria the agency will apply in determining that the impact will be mitigated. (Sierra Club v. County of Fresno (2018) 6 Cal.5th 502, 525). Performance standards based on specific objectives that inform the agency "what it is to do and what it must accomplish" are sufficient. (Center for Biological Diversity v. Department of Fish & Wildlife (2015) 234

Cal.App.4th 214, 245). CEQA does not require that the EIR specify an "arithmetically precise" allocation of funds; instead, when a mitigation measure requires that a plan for mitigation of an impact be developed in consultation with a responsible agency, it can be assumed that the agency is competent to determine the actions needed to implement a performance standard relating to matters within its area of expertise. (Tiburon Open Space Comm. v. County of Marin (2022) 78 Cal.App.5th 700, 774). Fair-share contribution in a mitigation measure is an accepted practice under CEQA, and in this case, the County has a standardized formula to determine contribution levels. (CEQA Guidelines Section 15130(a)). Here, Mitigation Measure M-WF-6 ensures that project-related impacts to fire protection services will be mitigated through fair-share funding that SDCFPD will use to enhance wildfire risk reduction and emergency response capabilities in the project area. Additionally, based on the final draft Fire Services Agreement included with the Draft EIR, it is anticipated that the project, at buildout, will pay a total of approximately $1 million toward capital improvements and more than $100,000 annually for ongoing operations. (See Draft EIR Appendix P, p. 2-3).

12. In Section 3, the commenter asserts that the Environmental Impact Report's mitigation measures are focused on conventional wildfire prevention and are insufficient for a full thermal runaway event. The commenter lists 16 categories of safety measures that are allegedly absent from the mitigation plan.

    See Comment Response #11. Under CEQA, when a mitigation measure requires that a plan for mitigation of an impact be developed in consultation with a responsible agency, it can be assumed that the agency is competent to determine the actions needed to implement a performance standard relating to matters within its area of expertise. (Tiburon Open Space Comm. v. County of Marin (2022) 78 Cal.App.5th 700, 774). Here, Mitigation Measure M-WF-6 requires the Applicant to enter into a Fire Protection and Mitigation Agreement with the SDCFPD prior to approval of a Major Use Permit and to make a fair share contribution toward local emergency response capabilities to ensure adequate fire suppression and emergency services capabilities. CEQA does not require a project applicant to ensure the provision of adequate fire and emergency medical services. As stated in City of Hayward v. Trustees of California State University (2015) 242 Cal.App.4th 833, 843: "the obligation to provide adequate fire and emergency medical services is the responsibility of the city. (Cal. Const., art. XIII, Section 35, subd. (a)(2) ["The protection of the public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services."].) The need for additional fire protection services is not an environmental impact that CEQA requires a project proponent to mitigate." However, as described above, the required Fire Protection and Mitigation Agreement ensures that the Applicant will be responsible for funding the additional public safety facilities and services associated with the project.

13. In Section 4, the commenter demands additional proposed mitigation measures. Demands 1-4 include a demand to complete "preliminary" safety analysis, including information specific to the actual Battery Energy Storage System technology to be installed, first responder training and equipment requirements, and hazardous materials response infrastructure.

    See Comment Responses #2, #8, #11, and #12 above.

14. In Section 4, Demand 5, the commenter demands additional evacuation protocols, an alert system, and on-site emergency capability.

    Regarding evacuation protocols, see Comment Response #5. Regarding the commenter's demand for additional weather modeling, a community alert system, and additional onsite emergency capability, see Comment Response # 12.

15. In Section 4, the commenter demands independent third-party review of the Draft Environmental Impact Report, additional incident reporting and monitoring requirements, specific financial commitments to support emergency response training, additional medical emergency response requirements.

    See Comment Responses # 11 and # 12.

16. In Section 4, the commenter demands additional review for any changes to battery technology from what is described in the Draft Environmental Impact Report.

    We disagree that any battery technology changes should require "full reanalysis" without County discretion. The Draft EIR explicitly states that the batteries would be high-density, lithium iron phosphate or other types with an equivalent or higher level of safety. (Section 1.4.1.5). CEQA provides that no subsequent or supplemental environmental impact report shall be required by the lead agency unless substantial changes are proposed in the project that will require major revisions of the environmental impact report, substantial changes occur with respect to the circumstances under which the project is being undertaken that will require major revisions in the environmental impact report, or new information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available. (PRC Section 21166). Even when major changes are proposed to a project that was previously approved on the basis of an EIR, the agency considering the proposal must determine in the first instance whether further environmental review is required under CEQA's provisions relating to subsequent environmental review. (El Morro Community Ass'n v. Department of Parks & Recreation (2004) 122 Cal.App.4th 1341, 1360). The lead agency may proceed under CEQA's subsequent review provisions as long as the prior EIR is relevant to the ongoing decision making process and retains some informational value. (Friends of the College of San Mateo Gardens v. San Mateo County Community College Dist. (2016) 1 Cal.5th 937, 952). We disagree that any change to battery technology or chemistry would constitute a substantial change, and even if it did, such a change would not render the entire EIR and its informational value irrelevant, but rather, the project change would be evaluated as required under PRC Section 21166.

17. In Section 4, the commenter demands that the Battery Energy Storage System be relocated to an alternative location to facilitate evacuation and emergency access requirements, demands increased setback distances, and an additional emergency access road.

    See Comment Response #5 above. Additionally, leading edge technical analysis indicates that the distance of the batteries from the nearest property is in all cases at least 1,200 feet from homes, over 12 times the 100 feet minimum for safety.

18. In Section 5, the commenter lists provisions in a variety of laws, regulations, and policies and suggests that the cited provisions support the demands in the comment letter. In Section 6, the commenter summarizes the demands in the comment letter.

    See the Comment Responses in this letter.

RESPONSE TO THE LATE COMMENT LETTER #2 FROM THOMAS WALL ON BEHALF ADAM ROBLEDO, DATED MARCH 12, 2026

1. The commenter repeats assertions from Comment Letter #1 regarding the insufficiency of the Draft Environmental Impact Report's fire risk and impact analysis. The commenter also asserts that the project's identified firefighting water supply is inadequate.

See the Comment Response #1 above. Regarding the sufficiency of the firefighting water supply, the Draft EIR provides for the availability of six 10,000 gallon water tanks on-site to ensure adequate fire mitigation, access, and safety (Mitigation Measure M-WF-1). Appendix L states: "The project would have six 10,000-gallon water tanks with a flow of at least 250 gallons per minute (gpm) and fire department connections would be available." (p. 7). Although the commenter asserts that the 60,000 gallon water reserve could be depleted in approximately 150 minutes at 400 gpm and notes that container fires may remain active for 50 minutes or longer, the commenter does not provide substantial evidence as to why the project's 60,000 gallon reserve is insufficient. In other words, the commenter does not cite any publication or standard applicable to the project that requires a water reserve of more than 150 minutes at 400 gpm. The Draft EIR states that the project would adhere to the recommendations of the FPP and would comply with all applicable fire codes. (Section 2.7.3.1). Appendix L states that "All new structures would be built to the requirements in the 2023 Consolidated Fire Code (County of San Diego 2023a), and battery storage cabinets would include a built-in heat detection and fire protection system and a fire extinguishing system in accordance with NFPA 855 Standard for the Installation of Stationary Energy Storage Systems." (p. 5). We therefore disagree that the reserve water supply is inadequate.

RESPONSE TO THE LATE COMMENT LETTER #3 FROM THOMAS WALL ON BEHALF OF THE BOULEVARD COMMUNITY IMPACT SUBCOMMITTEE, DATED MARCH 23, 2026

1. The commenter repeats fire risk analysis concerns addressed in response to Comment Letter #1.

   See the responses to Comment Letter #1.

2. The commenter demands increased setback distance from all roads, increased setback distance from the batteries to property lines, increased spacing between Battery Energy Storage System containers.

   See Global Response GR-1 in Chapter 8, Response to Comment and Revisions to the Draft EIR, of the Final EIR. Leading edge technical analysis indicates that the distance of the batteries from the nearest property is in all cases at least 1,200 feet from homes, over 12 times the 100 feet minimum for safety. It should also be noted that the Applicant is supportive of the request from the Boulevard Planning Group and also the newly established Boulevard Community Impact Committee to provide enhanced 300-foot setbacks from public roads, 400-foot setbacks from property lines and 500 feet setbacks from individual residences, although these enhanced setbacks are not required mitigation under CEQA.

   Regarding the demand for increased spacing between BESS units, the comment does not provide a specific, recommended, or alternative distance, nor does it provide technical evidence suggesting that the proposed spacing, which is designed in accordance with NFPA 855 and the California Fire Code, is insufficient to manage fire propagation risks. Pursuant to CEQA Guidelines Section 15204, an effect shall not be considered significant in the absence of substantial evidence. Here, the comment provides no data supporting the need for further battery separation. and a secondary paved evacuation route for families on Jewel Valley Road. Finally, the commenter asserts that the project's community benefits are inadequate and proposes additional construction impact mitigation measures to limit noise and dust.

3. The commenter demands the construction of a paved road along Tule Jim Lane as a secondary evacuation route.

We disagree that a secondary paved evacuation route along Tule Jim Lane is necessary. The commenter provides no evidence as to why an evacuation route must be paved to function effectively as an evacuation route. The Draft EIR states: "The project site is accessible via Jewel Valley Road and additional emergency access would be provided via Tule Jim Lane. Jewel Valley Road is paved in certain segments and is otherwise a flat, well-maintained dirt road. Tule Jim Lane is also a well-maintained dirt road. Both roads are wide enough to accommodate two-way traffic for emergency vehicles and connect to Old Highway 80 in the community of Boulevard." (Section 2.7.1.3). It should be noted that many dirt roads are used as emergency access in the County. Additionally, Tule Jim Lane is well maintained by San Diego Gas & Electric (SDG&E), whose 138 kilovolt (kV) Eco Sub gen-tie underlies the road.

4. The commenter asserts that the project's community benefits are insufficient.

   CEQA does not require analysis of community benefits not related to environmental impacts. CEQA requires only that an EIR must evaluate the environmental impacts of a project (PRC Section 21100). Economic and social effects that are not related to physical impacts or physical changes to the environment need not be evaluated in an EIR. (CEQA Guidelines Sections 15064(e), 15131(a); see County of Butte v. Department of Water Resources (2023) 90 Cal.App.5th 147, 174-176). However, it should be noted that the Applicant has proposed a substantial community benefits package, although such community benefits are not required mitigation under CEQA.

5. The commenter demands that a community alert system must be installed.

   See Comment Response #12. CEQA does not require the Applicant to ensure the provision of adequate emergency services. The Applicant will be required to enter into a Fire Protection and Mitigation Agreement with the SDCFPD prior to approval of a Major Use Permit and to make a fair share contribution toward local emergency response capabilities to ensure adequate fire suppression and emergency services capabilities. SDCFPD may consider, at its own discretion, what if any community alert system may be effective or desirable. It should be noted that the system proposed by the commenter, with lights, sirens, and backup power requirements, would likely have significant environmental impacts.

6. The commenter demands additional construction mitigation measures.

   See Comment Responses I-2-8 and I-3-7 in Chapter 8, Response to Comments and Revisions to the Draft EIR, of the Final EIR. The Applicant is required to adhere to all County noise regulations, including blasting and other equipment noise, both during construction and operation. Starlight noise sources already meet or exceed the noise mitigation measures required by County's noise standards; for example, the inverters are about 650 feet from any residence, and the substation is approximately 1,500 feet from any permitted residence. (see Draft EIR Section 2.5.2.3, Project Design Feature PDF-N-1, and Mitigation Measures M-N-1, M-N-2, and M-BI-10, and Draft EIR Section 2.5.6.2 Project Design Features. See also Noise Analysis Report Draft EIR Appendix J.1 and Construction Traffic Noise Memorandum Draft EIR Appendix J.2). Regarding working hours, the County requires work hours to be limited to 7:00 AM – 7:00 PM. As a practical matter, given an 8-hour workday, work is generally complete by 3 PM. (See Draft EIR Section 2.5.2.3). Regarding dust control, the Applicant is required to control fugitive dust emissions with the application of water during ground disturbing activities. Departures from effective dust control measures are enforceable per the Major Use Permit. (see Draft EIR Section 3.1.1, Appendix H.1 Starlight Solar Air Quality and Greenhouse Gas Technical Study and Appendix H.4 Starlight Solar Project—Air Quality and Greenhouse Gas Technical Study Memorandum—Fugitive Dust Control Measures Update).

7. The commenter demands local employment and workforce development measures.

   CEQA does not require a response to social or economic issue comments unrelated to significant environmental impacts. However, the Applicant addresses this objective, based on an executed Project Labor Agreement requiring specific labor practices, including outreach and communication to educate local communities to obtain highly skilled and trained workers, with paid apprenticeships that enhance upward mobility. (see https://www.dir.ca.gov/Public-Works/ADA-Compliant-STW-FAQ.pdf for more information).

8. The commenter notes general concern about potential impacts to land, wildlife, and community.

   See prior responses to the California Department of Fish and Wildlife (CDFW) comment letter. Native vegetation buffers are already part of the project. Additionally, all solar arrays were planned with input and direction from County biologists, SWCA project biologists, and the Supervisory Biologist of the Western Region of the United States Geological Survey (USGS). The USGS has undertaken long term biological studies on the property. Finally, with the concurrence of the County, the United States Fish & Wildlife Service (USFWS), and CDFW, the project successfully completed the determination of consistency with the State Natural Community Conservation Program (NCCP) Planning Agreement. The NCCP consistency determination documents that the project will contribute to and not impede the formation of a landscape-level preserve based on adopted NCCP conservation planning principles. (see Draft EIR Section 2.2 Biological Resources). Additionally, the Applicant has already committed to use a low-growing native seed mix groundcover under the solar arrays subject to approval of the County Fire Marshal. (see Draft EIR Section 1.4.1.8_Project Description). Additionally, the Applicant has already planned for perimeter fencing that does not impede reptile movement. Fencing will only surround the solar arrays, is designed to be "wildlife friendly", and typically comprises chain link fencing with a gap at the bottom for small animal passage with plenty of space for reptiles and other species. (see Draft EIR Section 2.2.4.1 and Mitigation Measures M-BI-2 Temporary Construction Fencing and M-BI-12 Wildlife Corridor, plus Appendix K, Conceptual Resources Management Plan). Finally, although specific project equipment has not yet been selected, modern non-reflective avian-considerate panels are what solar developers typically use, and they are 2-5% more efficient. The installation pattern of solar arrays for single-axis tracking technology does not present the uniform appearance typical of lake effect-type collectors. Additionally, tracking solar panels tilt at approximately 45-60 degrees, so dew will slide off by gravity. Solar developers also prefer panels to be dust resistant, which saves on water for cleaning and labor costs.

Sincerely,

Johanna Falzarano
SWCA Principal Planning Team Lead, Southern California

Planning Commission Hearing - 06/12/2026

Fri, Jun 12 9:00 AM

Planning Commission Hearing - 06/12/2026 - Agenda Comments

Starlight Solar (1)

Neutral (1)

melissa lamoureux
June 10th 2026, 9:55 am

I respectfully request that the County deny approval of the Starlight Solar Project unless substantial additional analysis is completed regarding wildfire evacuation, battery energy storage system risks, and cumulative impacts to the Boulevard community. The project places a large-scale battery energy storage facility within a High Fire Hazard Severity Zone and relies primarily on Jewel Valley Road for access and evacuation. The Final EIR DOES NOT adequately demonstrate that residents could safely evacuate during a wildfire or battery fire event, nor does it demonstrate that emergency responders possess sufficient resources to address such an incident. Additionally, the County should more thoroughly evaluate cumulative impacts resulting from the growing concentration of industrial-scale energy facilities in the Boulevard area. While individual projects may appear manageable in isolation, CEQA requires consideration of the combined effect on community character, public safety, biological resources, and quality of life. For these reasons, I urge the County to reject the project or require substantial revisions and additional environmental review before any approval is considered.

June 10, 2026

Re: Support for the Starlight Solar and Energy Storage Project (PDS2022-MUP-22-010)

Dear Chair and Honorable Planning Commissioners,

On behalf of the undersigned organizations and communities we represent, we strongly support the proposed Starlight Solar and Storage Project (Agenda #4) in Boulevard. As the County works to ensure San Diego families have access to reliable, affordable energy, responsibly sited renewable energy and storage projects like Starlight are essential to keeping the lights on and meeting the region's energy needs and climate goals.

Starlight's renewable energy generation and storage capacity will prevent power shutoffs in the region and strengthen grid reliability during our recurring summers of historic heat waves. Because the project utilizes land adjacent to existing transmission infrastructure and an existing substation, it avoids the need for new major transmission corridors and thoughtfully includes significant setbacks from homes and roads, wildlife corridor protections, and preservation of approximately 448 acres of open space.

As our communities are crushed with the highest energy rates in the nation, renewable energy and battery storage are critical energy affordability solutions we need now. Starlight enables renewable energy to be stored and delivered when demand and costs are highest, improving

affordable energy access, grid reliability and resilience. Additional community benefits include local investments in the Backcountry Resource Center and support for the creation of a public park. We encourage continued engagement with Tribal governments, local residents, and community stakeholders to ensure cultural resources, public safety, and sensitive habitat areas remain protected throughout project implementation and operation.

Importantly, the Starlight project brings local job creation, economic benefits, and clean energy investment to the County. Starlight includes local workforce development through union jobs with local hiring requirements, ensuring the project is safe and well-maintained as fire safety is of the utmost importance. With advanced fire suppression systems and major and ongoing contributions towards capital improvements for local fire services, we're confident that Starlight strengthens emergency response capacity in the region and utilizes the highest standards of fire safety.

Starlight will play an important role in improving quality of life for families across the County as it is a key energy affordability solution, reduces pollution, and keeps the lights on. We request your support for the Starlight project to bring long-term community and environmental benefits to the region as we work to achieve 100% clean energy.

Sincerely,

Charles Rilli
Deputy Chapter Director
Sierra Club San Diego

Masada Disenhouse
Executive Director
SanDiego350

Serena Pelka
Senior Policy Advocate
Climate Action Campaign

Dan Silver
Executive Director
Endangered Habitat League

Andrew Meyer
San Diego Bird Alliance

Adria Fox
Founder & Development Architect/ Principal
C4GS

Adrienne Fusek
Executive Director
In Good Company

State Building and Construction Trades Council of California

CHRIS HANNAN
PRESIDENT

J. TOM BACA
SECRETARY-TREASURER

Established 1901
Chartered By
BUILDING AND CONSTRUCTION TRADES DEPARTMENT
AFL - CIO

June 3, 2026

Mr. Ronald Ashman, Chair
County of San Diego Planning Commission
5510 Overland Avenue
San Diego, CA 92123

RE: Support for the Starlight Solar Project – PDS2022-MUP-22-010; LOG NO. PDS2022-ER-22-21-002

Dear Chair Ashman and Commissioners:

On behalf of the State Building and Construction Trades Council of California, representing more than 450,000 skilled construction workers statewide, I write in strong support of the Starlight Solar Project proposed by Empire II Starlight, LLC, including the project's battery energy storage system component, located in southeastern unincorporated San Diego County.

The Starlight Solar Project represents an important investment in California's clean energy infrastructure and long-term electric grid reliability. The project's 100 MW of solar generation, paired with 200 MW of battery energy storage, will help ensure that renewable energy can be captured, stored, and dispatched when demand is highest. As California continues to integrate renewable energy resources and move toward a cleaner electric grid, projects like Starlight are essential to strengthening reliability and supporting the state's clean energy goals.

In addition to its energy and environmental benefits, the project will generate substantial employment opportunities for California's current skilled construction workforce while supporting apprenticeship and workforce training pathways for the next generation of tradespeople. Projects of this scale create high-quality jobs, strengthen local communities, and help sustain the pipeline of skilled workers needed to build California's clean energy future.

Importantly, the State Building Trades and Empire II Starlight, LLC have signed a Letter of Agreement that establishes the framework for a future Project Labor Agreement covering the construction of the project's battery energy storage component. This agreement reflects a shared commitment to using a highly skilled workforce and to ensuring the project is constructed safely, efficiently, and to the highest industry standards, while maintaining strong labor standards and workforce protections.

The State Building Trades strongly supports responsible energy infrastructure development that prioritizes safety, workforce standards, and community investment. We encourage the County of San Diego to advance the Starlight Solar Project, which aligns with California's climate objectives, supports good-paying construction careers, and helps maintain the state's electrical grid.

1231 I Street, Suite 302 • Sacramento, CA 95814-2933 • (916) 443-3302 • FAX (916) 443-8204

For these reasons, we respectfully urge the County of San Diego Planning Commission to approve the Starlight Solar Project.

Thank you for your consideration.

Sincerely,

CHRIS HANNAN
President

CH:mh
opeiu#29/afl-cio