From:	Katrina Westley
To:	LUEG, PDS.PlanningCommission; mark.slovic@sdcounty.ca.gov; Anderson, Joel; andrew.hayes@sdcounty.ca; Nicoletti, Vince
Subject:	[External] Starlight Solar; PDS2022-MUP-22-010; PDS2022-ER-22-21-002 Appendix Q JCSD
Date:	Tuesday, June 30, 2026 3:05:17 PM
Attachments:	San Diego County - Solar Project Ltr.pdf

Dear County of San Diego Planning & Development Services,

Please find the attached legal response from the Jacumba Community Services District regarding the Environmental Impact Report (EIR) Appendix Q.

I formally request that this document be included in the public record and made available for review by the commissioners and the general public. It is essential that this information is accessible prior to the Planning Commission meeting scheduled for July 12th.

Thank you for your assistance in ensuring this response is properly processed and distributed.

Kind regards,

Katrina Westley
Chairman, Board of Directors
Jacumba Community Services District

*Jacumba Community Services District
Committed to Providing Clean, Safe, Reliable Water for All Our Residents*

From: Adam Hiner
To: LUEG, PDS.PlanningCommission
Subject: [External] Please Support Our Three Community Requests for the Starlight Solar Project
Date: Friday, July 3, 2026 10:26:52 AM

Dear Planning Commissioners,

According to the County's own Final Environmental Impact Report (EIR), it is an indisputable fact that the Starlight Solar Project will inflict permanent, significant, and unavoidable consequences on the Boulevard community.

Because these disruptions are irreversible, I urge you to focus your attention entirely on **Impact and Balance**. The question before you is no longer whether our community will suffer, but how the County will actively restore equity between what this project strips away from Boulevard and what it gives back.

To offset these severe, long-term hardships, I respectfully request that the Commission integrate the following three mandatory conditions into any project approval:

- **Fire Safety:** Relocate all Phase 2 Battery Energy Storage System (BESS) facilities to the most distant edge of the Phase 2 site—completely away from local homes and vital evacuation routes. Additionally, mandate the construction of a Water Retention Basin to safeguard our local groundwater supplies in the event of a BESS fire.

- **Human Health and Community Safety:** Implement strict, transparent accountability for construction-related dust, noise, and traffic. This must include independent oversight and automatic enforcement penalties whenever established environmental standards are exceeded.

- **Community Impact Fund Commitment:** Require the project developer to make a genuine, multi-generational financial commitment to our town. This must come in the form of a minimum **$7 million Community Impact Fund**, which must be fully financed at the very launch of Phase 1.

  A Note on the Proposed Utility Credit: I completely reject the suggested 20% SDG&E bill credit as a valid substitute for real community reinvestment. It is a short-term band-aid that completely fails to address the permanent damages identified in the EIR. A upfront, $7 million Community Impact Fund is the only mechanism that will guarantee meaningful, lasting improvements for the families who will live with this infrastructure for decades to come.

The reality of this project's impact is settled. Whether you choose to provide a fair balance for the people of Boulevard is the only decision left to make.

Thank you for your time, leadership, and thoughtful evaluation of this critical matter.

Respectfully,

Adam Hiner

Boulevard Resident

From:	Katrina Westley
To:	LUEG, PDS.PlanningCommission; mark.slovic@sdcounty.ca.gov; Anderson, Joel; andrew.hayes@sdcounty.ca; Nicoletti, Vince
Subject:	[External] Starlight Solar; PDS2022-MUP-22-010; PDS2022-ER-22-21-002 Appendix Q JCSD
Date:	Tuesday, June 30, 2026 3:05:17 PM
Attachments:	San Diego County - Solar Project Ltr.pdf

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Kind regards,

Katrina Westley
Chairman, Board of Directors
Jacumba Community Services District

*Jacumba Community Services District
Committed to Providing Clean, Safe, Reliable Water for All Our Residents*

From:	miles maeda
To:	LUEG, PDS.PlanningCommission
Subject:	[External] Three Non-Negotiable Conditions for the Starlight Solar Project
Date:	Friday, July 3, 2026 8:59:09 AM

Dear Planning Commissioners,

The Final EIR is clear: Starlight Solar will cause permanent, significant, unavoidable impacts to Boulevard. That's not my opinion. That's the County's own conclusion.

So the question isn't whether we've been impacted. It's what the County does about it.

I'm asking you to approve three conditions of approval:

1. Fire Safety. Relocate all Phase 2 BESS facilities to the furthest possible point from homes and evacuation routes. Require a Water Retention Basin to protect our groundwater in the event of a BESS fire.

2. Real Accountability. Independent monitoring for dust, noise, and construction impacts, with real enforcement when standards are exceeded.

3. A $7 Million Community Impact Fund. Fully funded at the start of Phase 1. Not a promise. Not a phased trickle. Funded, upfront, as a condition of approval.

The proposed 20% SDG&E bill credit doesn't cut it. It doesn't touch the permanent impacts in the EIR, and it doesn't leave Boulevard with anything lasting. A fully-funded $7 million commitment does.

Impact is settled. Balance is what's still on the table.

Thank you for your consideration.

Respectfully,
Miles Maeda

Boulevard, CA

From:	Chantaia Soleil
To:	LUEG, PDS.PlanningCommission
Subject:	[External] Please Support Our Three Community Requests for the Starlight Solar Project
Date:	Tuesday, July 7, 2026 12:08:01 PM

Dear Planning Commissioners,

The Final Environmental Impact Report concludes that the Starlight Solar Project will have **permanent, significant, and unavoidable impacts** on the Boulevard community. That finding is not in dispute—it is the County's own conclusion.

Because these impacts are permanent, I respectfully ask you to focus on **Impact and Balance**. The question before you is no longer whether these impacts exist, but how the County will restore greater balance between what this project takes from Boulevard and what it gives back.

To restore greater balance between the permanent, significant, and unavoidable impacts identified in the EIR and the community that will bear those impacts, I respectfully ask the Commission to approve the following three conditions of approval:

Fire Safety: Move all Phase 2 BESS facilities to the furthest location in Phase 2, away from homes and evacuation routes, and require a Water Retention Basin to protect our groundwater during a BESS fire.

Human Health and Community Safety: Meaningful accountability for dust, noise, and construction impacts, including independent monitoring, enforcement when standards are exceeded.

Community Impact Fund Commitment: We ask the County to require, as a condition of project approval, that the project applicant make a meaningful and lasting commitment to the Boulevard community through a minimum **$7 million Community Impact Fund, fully funded at the start of Phase 1.**

I respectfully reject the proposed 20% SDG&E bill credit as a substitute for meaningful community investment. It does not address the permanent impacts identified in the EIR or provide lasting benefits to Boulevard. A **$7 million Community Impact Fund**, fully funded at the start of Phase 1, would create meaningful, lasting improvements for the community that will live with these impacts for generations.

Impact is no longer in dispute. The question before you is whether balance will be.

Thank you for your thoughtful consideration.

Respectfully,

Chanti Holroyd

Boulevard Community

From:	Dennis Berglund P.E.
To:	LUEG, PDS.PlanningCommission
Cc:	Thomas Wall; blvdgoodnight@gmail.com
Subject:	[External] Three Community Requests for the Starlight Solar Project
Date:	Sunday, July 5, 2026 9:07:33 PM

To: County of San Diego Planning Commission,

I represent the Real East County Fire Safe Council (RECFSC), and we have been monitoring the progress of the Starlight Solar Project. Our previous communication identified our concern with the negative fire consequences of any Lithium-Ion battery installation.

The RECFSC supports the three current community requests as follows:

Fire Safety: Move all Phase 2 BESS facilities to the furthest location in Phase 2, away from homes and evacuation routes, and require a Water Retention Basin to protect our groundwater during a BESS fire. ****See additional request below.**

Human Health and Community Safety: Meaningful accountability for dust, noise, and construction impacts, including independent monitoring, enforcement when standards are exceeded.

Community Impact Fund Commitment: We ask the County to require, as a condition of project approval, that the project applicant make a meaningful and lasting commitment to the Boulevard community through a minimum **$7 million Community Impact Fund, fully funded at the start of Phase 1.**

** We understand that an on-project site pond containing approximately 1.2 million gallons will be used as the backup fire water source. If this is going to be used as the backup water source, the pond must be fitted with a high-volume water extraction system (pump and piping) because most fire engines and all water trucks do not include suction hoses or filling capabilities.

Thank you for your attention to this matter.

Dennis

Dennis Berglund, PE
President
Priax Corporation
P.O. Box 776
33408 Sandy Creek Lane
Pine Valley, CA 91962
Phone: 619-478-2600, ext. 12
Fax: 619-478-2555

Email: dennis@priax.com
Web: http://www.priax.com

From: Koutoufidis, Nicholas
To: LUEG, PDS.PlanningCommission
Subject: FW: Developer-Funded Specialized BESS Fire Mitigation Equipment for Starlight Solar (PDS2022-MUP-22-010)
Date: Wednesday, July 8, 2026 9:30:16 AM

Hi Georgina,

Please see below.

Best,

Nick Koutoufidis, MBA
Land Use & Environmental Planner | He/Him/His
County of San Diego | Planning & Development Services
~~Phone: (619) 356-8348~~ | Email: Nicholas.Koutoufidis1@sdcounty.ca.gov

New Number: (619) 340-5481

From: Zach Allen <zallen@euramco.com>
Sent: Wednesday, July 8, 2026 8:16 AM
To: Koutoufidis, Nicholas <Nicholas.Koutoufidis1@sdcounty.ca.gov>
Subject: [External] Developer-Funded Specialized BESS Fire Mitigation Equipment for Starlight Solar (PDS2022-MUP-22-010)

Dear Mr. Koutoufidis,

My name is Zach Allen. I am a Boulevard resident (Morning Star Ranch, 120-acre livestock ranch in 91905), a certified firefighter (FF1/FF2), and the owner of Euramco Group / RAMFAN, headquartered in Spring Valley, CA. I am writing to provide formal public comment on the Starlight Solar Project (PDS2022-MUP-22-010) and propose a targeted, developer-funded fire risk mitigation solution ahead of tomorrow's Planning Commission hearing.

As a Boulevard property owner, I have a firsthand understanding of the extreme fire risks in this Very High Fire Hazard Severity Zone. On my own ranch, normal operational use (residential, basic landscaping, watering livestock) can consume 60,000 gallons of water in a week — the exact volume cited in the project's proposed suppression measures. Well-documented BESS thermal runaway events, including the Otay Ranch Gateway Energy Storage fire right here in San Diego County, required over 5 million gallons across 17 days of active suppression. In a high-volume scenario here, the marginal addition of 60,000 gallons (<2% of Otay Ranch volumes) is grossly insufficient.

I am one of the few local residents who does **not** oppose the project outright. I fully appreciate the value of local renewable energy generation and recognize that battery storage is essential for buffering intermittent solar output to the grid. That said, utility-

scale BESS introduces new and significant fire risks to an already stretched response area. These risks are manageable with the right tools, but require more than general water capacity.

As a firefighter, I have specifically studied and participated in international trainings and task groups focused on BESS fire behavior and suppression. As the owner of Euramco Group (RAMFAN), a Spring Valley-based manufacturer of world-class hazardous-area ventilation and high-performance fire equipment, we are uniquely positioned to help. Through our established partnership with EMI Controls, we have developed a specialized **high-flow water mist turbine (FT60-class)** mounted on a Ford F550 chassis (nimble Type 6 / light wildland configuration), purpose-built for BESS and high-energy-density applications where micro-droplet mist cooling is the most practical and effective solution for thermal runaway propagation control.

This platform offers rapid mist cooling to control propagation, reduced water consumption with superior heat absorption, and seamless integration with RAMFAN ventilation for toxic smoke management. It would serve as a dedicated regional asset for CAL FIRE or the San Diego County Fire Protection District — not a general-fund burden — and would keep manufacturing jobs and economic activity in San Diego County. Delivery is achievable within approximately 6 months.

Local homeowners already shoulder asymmetrically high insurance premiums due to broad-brush high-fire-risk classifications. Conditioning project approval on developer funding for this specialized equipment represents a responsible, first-principles approach to mitigation that directly addresses community concerns while supporting the project's energy goals.

I would welcome the opportunity to provide a short briefing, attach a one-pager with unit specs/timeline/budget, or deliver testimony for the record. I am happy to supply full details immediately.

Thank you for your work on this project. I look forward to your thoughts on incorporating this practical solution.

Best regards,

Zach Allen

Morning Star Ranch, Boulevard, CA

Owner, Euramco Group / RAMFAN (Spring Valley, CA)

+1-619-507-0687

zallen@euramco.com

Certified Firefighter | International BESS Fire Research & Task Force Participant

From: Melanie Zardeneta
To: LUEG, PDS.PlanningCommission
Subject: [External] Starlight Solar
Date: Saturday, July 4, 2026 12:03:15 AM

Dear Planning Commissioners,

The Final EIR finds the Starlight Solar Project will cause permanent, significant, and unavoidable impacts to the Boulevard community. Because these impacts are the County's own finding, I ask you to ensure the project gives back in a fair and lasting way.

As conditions of approval, please require:

- Relocation of all Phase 2 BESS facilities as far from homes and evacuation routes as possible, plus a water retention basin to help protect groundwater in the event of a battery fire.
- Independent monitoring and enforcement of dust, noise, and other construction impacts to protect public health.
- A $7 million Community Impact Fund, fully funded at the start of Phase 1, to provide meaningful long-term benefits to Boulevard.

The proposed 20% SDG&E bill credit is not an adequate substitute for lasting community investment and does not address the permanent impacts identified in the EIR.

The impacts are no longer in dispute. The question is whether the County will require a balanced and lasting investment in the community that will live with them.

Thank you for your consideration.

Sincerely,

Melanie Hayden
(619)456-1988
1592 Jewel Valley Rd
Boulevard, CA. 91905

Lagerlof LLP
LAWYERS

June 30, 2026

VIA E-MAIL – Nicholas.Koutoufidis1@sdcounty.ca.gov

Mr. Nicholas Koutoufidis
County of San Diego

Re: Starlight Solar Project – Water Supply Issue - CEQA

Dear Mr. Koutoufidis:

I am the attorney for Jacumba Community Services District (the "District"). The District has forwarded me various items of prior correspondence regarding the water supply issues for the Starlight Solar Project (the "Project"). In addition, I am aware of recent statements the County has made with respect to the Project and the related water supply issues. One of those statements relied on a June 30, 2022 "Project Facility Availability – Water" document signed by the District's General Manager at that time. That document is included as Appendix Q to the draft Environmental Impact Report for the Project. Significantly, that document includes a statement that "This Project Facility Availability Form is valid until final discretionary action is taken pursuant to the application for the proposed project or until it is withdrawn, unless a shorter expiration date is otherwise noted."

The County's reliance on that document is misplaced, as the District's Board of Directors took action on April 25, 2023 to cancel all then outstanding water supply agreements and commitments the District had in place. That action nullified the June 30, 2022 Project Facility Availability – Water document and therefore there is no commitment from the District now in place with respect to the provision of water to the Project, which is situated outside of its jurisdictional boundaries and sphere of influence.

The County must take the above issues into consideration as it further reviews the environmental impacts of the Project.

Very truly yours,

James D. Ciampa

cc: Board of Directors, Jacumba Community Services District (by e-mail)

From: Thomas Wall
To: LUEG, PDS.PlanningCommission
Subject: [External] Starlight Solar Community Asks
Date: Friday, July 3, 2026 12:40:47 PM

Dear Planning Commissioners,

We thank the County staff for your professionalism, your work on the Environmental Impact Report, and for taking the time to read this letter. We respectfully ask that you share it with each Planning Commissioner and clearly elevate our three direct requests prior to the hearing.

As our community has participated throughout this process, we have not always agreed on every issue. However, there is one point on which there is no dispute. The Final Environmental Impact Report concludes that this project will result in **permanent, significant, and unavoidable impacts** to Boulevard. That finding is not ours—it is the County's own conclusion.

That shared understanding is our common ground.

The question before the Commission is no longer whether these impacts exist. The Environmental Impact Report has already answered that question. The question is how the County will respond to the community that must live with those permanent impacts for decades to come.

This is your opportunity to restore greater balance between what this project takes from Boulevard and what it gives back.

We invite you to view our requests through that lens—not as obstacles to the project, but as reasonable conditions that acknowledge the reality of the impacts identified in the EIR and demonstrate a meaningful commitment to the people who will bear them.

To restore greater balance between the permanent, significant, and unavoidable impacts identified in the EIR and the community that will bear those impacts, we respectfully ask the Commission to approve the following three *conditions of approval:*

Fire Safety

Move all Phase 2 BESS facilities to the furthest location in Phase 2, away from homes and evacuation routes, and require a Water Retention Basion to protect our groundwater during a BESS fire.

Human Health and Community Safety

Meaningful accountability for dust, noise, and construction impacts, including independent monitoring, enforcement when standards are exceeded.

Community Impact Fund Commitment

We ask the County to **require**, as a condition of project approval, that the project applicant make a meaningful and lasting commitment to the Boulevard community through a minimum

$7 million Community Impact Fund, fully funded at the start of Phase 1.

Our request for a Community Impact Fund deserves special consideration.

We respectfully and unequivocally reject the proposed 20% SDG&E bill credit as a substitute for meaningful community investment. It does not address the permanent, significant, and unavoidable impacts identified in the EIR. It does not improve public safety, protect public health, strengthen community infrastructure, or revitalize Boulevard. It is not what our community requested, and it is not a meaningful response to the lasting impacts this project will impose.

A **$7 million Community Impact Fund, fully funded at the start of Phase 1**, is a meaningful investment in Boulevard's future. It would strengthen emergency preparedness, improve community infrastructure, support locally identified priorities, and help revitalize the community that will bear these permanent impacts. Rather than offering a temporary utility bill discount, it creates a lasting legacy and demonstrates a genuine commitment to giving back to the community that is sacrificing so much.

Ultimately, this decision is about more than approving a project. It is about the legacy the County chooses to leave. Future generations will not simply ask whether this project was approved—they will ask whether the County recognized the magnitude of its own findings and acted accordingly.

By approving these three reasonable conditions, you acknowledge the reality of the project's permanent, significant, and unavoidable impacts while helping restore greater balance through meaningful action. This is an opportunity for County staff, the Planning Commission, the project applicant, and the developer to work together in a spirit of collaboration—one that not only recognizes what Boulevard is being asked to give, but also invests in its future.

Impact is no longer in dispute. The question before you is whether balance will be.

We respectfully ask you to seize that opportunity.

Respectfully,

Thomas Wall

From:	Tone M
To:	LUEG, PDS.PlanningCommission
Subject:	[External] Please Support Our Three Community Requests for the Starlight Solar Project
Date:	Friday, July 3, 2026 2:45:12 PM

Dear Planning Commissioners,

The Final Environmental Impact Report concludes that the Starlight Solar Project will have **permanent, significant, and unavoidable impacts** on the Boulevard community. That finding is not in dispute—it is the County's own conclusion.

Because these impacts are permanent, I respectfully ask you to focus on **Impact and Balance**. The question before you is no longer whether these impacts exist, but how the County will restore greater balance between what this project takes from Boulevard and what it gives back.

To restore greater balance between the permanent, significant, and unavoidable impacts identified in the EIR and the community that will bear those impacts, I respectfully ask the Commission to approve the following three conditions of approval:

Fire Safety: Move all Phase 2 BESS facilities to the furthest location in Phase 2, away from homes and evacuation routes, and require a Water Retention Basin to protect our groundwater during a BESS fire.

Human Health and Community Safety: Meaningful accountability for dust, noise, and construction impacts, including independent monitoring, enforcement when standards are exceeded.

Community Impact Fund Commitment: We ask the County to require, as a condition of project approval, that the project applicant make a meaningful and lasting commitment to the Boulevard community through a minimum **$7 million Community Impact Fund, fully funded at the start of Phase 1.**

I respectfully reject the proposed 20% SDG&E bill credit as a substitute for meaningful community investment. It does not address the permanent impacts identified in the EIR or provide lasting benefits to Boulevard. A **$7 million Community Impact Fund**, fully funded at the start of Phase 1, would create meaningful, lasting improvements for the community that will live with these impacts for generations.

Impact is no longer in dispute. The question before you is whether balance will be.

Thank you for your thoughtful consideration.

Respectfully,

Name: Tone M

Community: Boulevard, CA

From: Thomas Wall
To: LUEG, PDS.PlanningCommission
Subject: [External] Video Starlight Solar
Date: Wednesday, July 8, 2026 7:56:38 AM

Good morning,

I am writing with a sincere request for your assistance.

Our community has created a brief, clear, and concise video summarizing our primary concerns regarding the Starlight Project and the three specific requests we will be presenting at Friday's hearing.

If possible, we respectfully ask that you share this video with the Planning Commissioners before the hearing.

We intentionally created this overview to help streamline Friday's proceedings. By providing the Commissioners with the background and context in advance, we hope the hearing can be more focused, concise, and productive, allowing more time to discuss the specific issues and proposed conditions.

We truly appreciate your time, consideration, and any assistance you can provide.

Thank you.

Thomas Wall

Community Overview Video:
https://www.youtube.com/watch?v=660IVC2nVYM&feature=youtu.be