

Response to Comment Letter O6

Boulevard Planning Group

- O6-1** This email cover letter is an introductory comment stating that the Boulevard Planning Group is submitting comments on the Draft EIR. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-2** This is an introductory comment thanking the County for extending the public comment period on the Draft EIR. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-3** The commenter states that the Boulevard Planning Group took action on November 10, 2020 to “continue previous opposition to JVR (solar) Energy Park and to authorize Chair to submit comments” on the Draft EIR. The comment states that five members of the Planning Group voted in favor of the action and one member voted against. In response, the County acknowledges the Boulevard Planning Group’s opposition to the Proposed Project. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-4** The commenter states that the Proposed Project will impact the Jacumba community and the surrounding area, including groundwater supplies, aesthetic and visual resources, property values, and public health and safety. This comment provides a summary of the discussion contained within the remainder of the comment letter. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to Chapters 2 and 3 of the Draft EIR for an analysis of potential impacts to the environment caused by the proposed development of the Proposed Project. Further, please refer to Global Response GR-1 Socioeconomics and Environmental Justice regarding the relationship between CEQA and socio-economic considerations.
- O6-5** The commenter states that the Boulevard Planning Group supports the no project alternative discussed in the Draft EIR. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-6** The commenter states that the Boulevard Planning Group incorporates the Planning Group’s April 7, 2019 comments on the Notice of Preparation for the Project as its

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- comments on the Draft EIR. In response, please refer to responses to the Boulevard Planning Group’s comments on the Notice of Preparation below. (See Responses to Comments O6-30 through O6-171.)
- O6-7** The commenter states that the Boulevard Planning Group incorporates the comments submitted by Donna Jones Law (on behalf of We Are Human Kind, LLC) on the Draft EIR as its comments on the Draft EIR. In response, please refer to responses to comment letter O7 submitted by Donna Jones Law. (See Responses to Comments O7-1 through O7-199.)
- O6-8** The commenter states that the Boulevard Planning Group incorporates the December 2, 2020 comments submitted by Cherry Diefenbach on the Draft EIR as its comments on the Draft EIR. In response, please refer to responses to comment letter I117 submitted by Cherry Diefenbach. (See Responses to Comments I117-1 through I117-116.)
- O6-9** The commenter states that the Boulevard Planning Group requests that the Proposed Project be denied because it is incompatible with the Jacumba community and will generate noise, visual, electrical, agriculture, and wildfire impacts. In response, the County acknowledges the Boulevard Planning Group’s opposition to the Proposed Project. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, the County refers the commenter to Chapters 2 and 3 of the Draft EIR for an analysis of potential impacts to the environment caused by the proposed development of the Proposed Project. Please also refer to Global Response GR-4 Electromagnetic Field Impacts.
- O6-10** The commenter refers the County to an article attached to the comment letter, entitled “Desert Rose and the Story of Stray Currents,” which purportedly relates to electrical pollution health impacts from electrical infrastructure. The article describes the uncertain health effects associated with stray electrical current passing through the earth back to electrical substations. In response, there is no agreement among scientists that stray electrical current poses a potential health risk, and there are no defined or adopted CEQA impacts concerning a health risk from stray current exposure in CEQA Guidelines, Appendix G. (14 CCR §§ 15000 et seq.) Further, Section 1.2.1 Solar Facility, of Chapter 1 Project Description, Location and Environmental Setting, of the EIR describes the collector substation and Switchyard Facilities proposed as part of the Proposed Project. These facilities would be located on the eastern portion of the Project site, away from existing residences. Therefore, the Proposed Project is not anticipated to increase human exposure to stray ground electrical currents even given the uncertain science related to the alleged potential health effects of such currents. Please also refer

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- to Global Response GR-4 Electromagnetic Field Impacts, which discusses potential health impacts associated with the Proposed Project’s solar array and associated facilities.
- O6-11** The commenter states that the Boulevard Planning Group requests that the Proposed Project be denied because it lacks “adequate / legitimate mitigation” for impacts to fire services, groundwater resources, visual, biological, cultural, historical, agriculture, recreation, property values, quality of life, tourism, and light pollution. In response, the comment does not raise any specific issue with the Draft EIR; no further response is required. However, please refer to Chapters 2 and 3 of the Draft EIR for an analysis of potential impacts to the environment caused by the proposed development of the Proposed Project, as well as mitigation measures to reduce the Proposed Project’s impacts to less than significant. Despite the mitigation, the Draft EIR concludes that the Proposed Project would cause significant and unavoidable impacts to aesthetic and visual resources, and the on-site habitat preservation (biological open space easement) in accordance with mitigation measure **M-BI-3** would cause significant and unavoidable impacts to mineral resources. Please also refer to Global Response GR-1 Socioeconomics and Environmental Justice, which discusses the relationship between CEQA and socio-economic considerations.
- O6-12** The commenter states that the Boulevard Planning Group requests that the Project be denied because it fails to adequately address the Proposed Project’s environmental justice, economic, public health and safety, and quality of life impacts to the residents in the Jacumba Hot Springs community. In response, the comment does not raise any specific issue with the Draft EIR, no further response is required. However, please refer to Chapters 2 and 3 of the EIR for an analysis of potential impacts to the environment caused by the proposed development of the Proposed Project. Please also refer to Global Response GR-1 Socioeconomics and Environmental Justice, which discusses the relationship between CEQA and socio-economic considerations.
- O6-13** The commenter states that the Boulevard Planning Group requests that the Proposed Project be denied because it fails to address cumulative and cumulatively significant adverse impacts resulting from “heavy vehicle traffic and groundwater mining relating to ongoing construction of the new border wall.” In response, the comment does not raise an issue regarding the analysis contained within the Draft EIR; therefore, no further specific response is required. However, please refer to Section 2.7.4.4 of the EIR which analyzes cumulative impacts to groundwater resources and concludes that the Proposed Project would not result in a cumulatively considerable impact to groundwater resources. Similarly, Section 3.1.7.5 of the EIR analyzes cumulative

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impacts to transportation resources and concludes that the Proposed Project would not have a cumulative impact to such resources.

With respect to the Border Wall project, the County of San Diego Environmental Impact Report Format and General Content Requirements states that the environmental baseline analyzed in the Draft EIR “shall be the environmental conditions as they existed at the time the Notice of Preparation (“NOP”) is published, or if no NOP is published, at the time environmental analysis is commenced.” (*Id.* at § 1.4.) This policy is in accordance with the CEQA Guidelines section 15125(a)(1), which states generally, “the lead agency should describe physical environmental conditions as they exist the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective.” (See also *South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 337-38 [upholding EIR’s use of cumulative projects list prepared at the time of the Notice of Preparation].) The Notice of Preparation for the Draft EIR was published on March 7, 2019, and the County first became aware of border wall construction in the vicinity of the Proposed Project in the spring of 2020.¹ Accordingly, the border wall construction in the vicinity of the Proposed Project is not included within the environmental baseline for the Proposed Project and the Project’s cumulative impacts with the border wall construction need not be analyzed in the Draft EIR.

- O6-14** The commenter states that the Proposed Project objectives are “self-serving and do virtually nothing for the impacted community at ground-zero.” In response, the Project objectives and purpose are defined in Section 1.1 of Chapter 1, Project Description, of the Draft EIR. As the lead agency, the County has the discretion to “identify and pursue a particular project designed to meet a particular set of objectives.” (*San Diego Citizenry Group v. County of San Diego* (2013) 219 Cal.App.4th 1, 14; *California Oak Foundation v. Regents of University of California* (2010) 188 Cal.App.4th 227, 276-77.)
- O6-15** The commenter asks how “much more of this disproportionate industrial conversion is one area expected to bear?” In response, the comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to Section 3.1.4, Land Use and Planning, of the Draft EIR.

¹ https://www.cbp.gov/sites/default/files/assets/documents/2020-Apr/FY20%20San%20Diego%20County%20Border%20Barrier%20Projects%20Request%20for%20Input%20Extension_ENGLISH.pdf

O6-16 The commenter states that Objective 1 does not address the life-cycle impacts of solar energy, including mining, processing, and disposal. Objective 1 is for the development of “a solar energy project with a rated capacity of up to 90 megawatts of alternating current and an energy storage facility that can supply electricity to indirectly reduce the need to emit greenhouse gases caused by the generation of similar quantities of electricity from either existing or future nonrenewable sources to meet existing and future electricity demands, including during on-peak power periods.” In response, the County has the discretion to “identify and pursue a particular project designed to meet a particular set of objectives.” (*San Diego Citizenry Group v. County of San Diego* (2013) 219 Cal.App.4th 1, 14; *California Oak Foundation v. Regents of University of California* (2010) 188 Cal.App.4th 227, 276-77.) The County does not agree that “lifecycle” greenhouse gas emissions for the Project should be included in this objective for the reasons stated below.

Under CEQA, a lifecycle analysis is not required. A lifecycle analysis is used to assess the overall greenhouse gas impacts of a fuel, including each stage of its production and use. When considering Manhattan Beach’s adoption of an ordinance banning point-of-sale plastic bags within the city limits, the California Supreme court held:

this case serves as a cautionary example of overreliance on generic studies of ‘life cycle’ impacts associated with a particular product. Such studies, when properly conducted, may well be a useful guide for the decision maker when a project entails substantial production or consumption of the product. When, however, increased use of the product is an indirect and uncertain consequence, and especially when the scale of the project is such that the increase is plainly insignificant, the product ‘life cycle’ must be kept in proper perspective and not allowed to swamp the evaluation of actual impacts attributable to the project at hand.

(*Save the Plastic Bag Coalition v. City of Manhattan Beach* (2011) 52 Cal.4th 155, 175.) Further, the California Natural Resources Agency specifically chose to delete the word “lifecycle” from Appendix F of the CEQA Guidelines because there is no existing regulatory definition of lifecycle, such emissions may not be caused by the project under consideration, and a lead agency may not be able to require mitigation for emissions that result from the manufacturing process, among other reasons. (See California Natural Resources Agency’s Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB 97, p. 71 (2009); Final Statement of Reasons for Regulatory Action Amendments to the State CEQA Guidelines, p. 41 (2018).)

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- O6-17** The commenter states the Boulevard Planning Group’s opposition to the federal solar Investment Tax Credit. The comment states that taxpayers pay for tax credits offered to renewable energy developers and the United States exports more energy than it imports. In response, the comment does not raise a specific issue with the adequacy of the analysis of the Proposed Project in the Draft EIR; thus, no specific response is required. Rather, the comment raises an issue with the Project objectives. Objective 2 is to develop “a renewable energy solar energy project that can meet the criteria to achieve the maximum federal solar Investment Tax Credit, which is intended to decrease the cost of renewable energy generation and delivery, promote the diversity of energy supply, and decrease dependence of the United States on foreign energy supplies.” In other words, the County exercised its discretion to choose an objective of pursuing a project that is eligible for the federal solar Investment Tax Credit. The County has the discretion to “identify and pursue a particular project designed to meet a particular set of objectives.” (*San Diego Citizenry Group v. County of San Diego* (2013) 219 Cal.App.4th 1, 14; *California Oak Foundation v. Regents of University of California* (2010) 188 Cal.App.4th 227, 276-77.) The County also notes the commenter’s opposition to the federal solar Investment Tax Credit.
- O6-18** The commenter provides states that the Proposed Project is not required to meet the State’s renewable energy goals for 2045 under SB 100. The comment is in relation to Objective 3. Objective 3 states that the Project will assist in achieving the state’s “Renewables Portfolio Standard (RPS), as mandated under the 100 Percent Clean Energy Act of 2018 (Senate bill 100), by developing and constructing California RPS-qualified solar generation from eligible renewable energy resources by December 31, 2045.” In response, there is no evidence that the Proposed Project will not meet this Objective and assist the State in achieving the goals of SB 100. SB 100 increased the standards set forth in SB 350 and targets California’s renewable energy and zero-carbon resources to supply 100 percent of electric retail sales to end-use customers and 100 percent of electricity procured to serve state agencies by December 31, 2045. The Draft 2021 SB 100 Joint Agency Report, prepared by the California Energy Commission, the California Public Utilities Commission, and the California Air Resources Board as required by SB 100, found that SB 100’s goals are achievable with “record setting build rates” for new renewable energy generation resources. (Draft Report, p. 25, <https://efiling.energy.ca.gov/getdocument.aspx?tn=235848>.) Accordingly, additional renewable energy, like the energy supplied by the Proposed Project, is required to meet the State’s renewable energy goals under SB 100.
- O6-19** The commenter refers to additional comments submitted by Boulevard Planning Group regarding the “double-standard for Public Safety Power Shutoffs where wind and solar project are allowed to continue to operate during PSPS events while locals are left in

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the dark during Red Flag high wind events.” As it relates to Objective 4, the comment asks how the Project will increase reliability for the Jacumba community. In response, the please refer to Responses to Comments O6-25 and O6-26 regarding power shutoffs in the Jacumba community. Further, this comment does not raise a specific issue with the adequacy of the analysis of the Proposed Project in the Draft EIR; thus, no specific response is required. Rather, the comment raises an issue with the County’s selection of the Project objectives. Objective 4 is to develop a “utility-scale solar energy project that improves electrical reliability for the San Diego region by providing a source of local generation as near as possible to existing San Diego Gas and electric (SDG&E) transmission infrastructure.” The objective, in other words, is to increase electrical reliability in the San Diego region, not just the eastern portion of the County. The County has the discretion to “identify and pursue a particular project designed to meet a particular set of objectives.” (*San Diego Citizenry Group v. County of San Diego* (2013) 219 Cal.App.4th 1, 14; *California Oak Foundation v. Regents of University of California* (2010) 188 Cal.App.4th 227, 276-77.)

O6-20 The commenter states the Boulevard Planning Group’s preference that energy storage should be installed at existing SDG&E substations and not as part of the Project. The comment states that new batteries represent new fire hazards in high fire severity zones. In response, please refer to Section 2.12, Wildfire, of the Draft EIR for an analysis of the Project’s potential impacts from wildfire risk, including risk from energy storage components. Objective 5 states “Provide a new source of energy storage that assists the state in achieving or exceeding its energy storage targets, consistent with the terms of Assembly Bill 2514, and its greenhouse gas reduction targets, consistent with Assembly Bill 32 and Senate Bill 32.” The County has the discretion to “identify and pursue a particular project designed to meet a particular set of objectives.” (*San Diego Citizenry Group v. County of San Diego* (2013) 219 Cal.App.4th 1, 14; *California Oak Foundation v. Regents of University of California* (2010) 188 Cal.App.4th 227, 276-77.)

O6-21 The commenter states that “virtually all of San Diego qualifies as having good / excellent solar attributes.” In response, this comment relates to Objective 6, which states “Site a solar energy project in an area within San Diego County that has excellent solar attributes, including but not limited to high direct normal irradiance, in order to maximize productivity.” The comment does not raise a specific issue with the adequacy of the analysis of the Proposed Project in the Draft EIR; thus, no specific response will be provided. However, please refer to the National Energy Regulatory Laboratory, which shows that direct normal irradiance (DNI) varies throughout the County (https://maps.nrel.gov/nsrdb-viewer/?aL=x8CI3i%255Bv%255D%3Dt%26VRLt_G%255Bv%255D%3Dt%26VR

Lt_G%255Bd%255D%3D1%26ozt_aP%255Bv%255D%3Dt%26ozt_aP%255Bd%255D%3D2&bL=clight&cE=0&lR=0&mC=33.006936039186705%2C-116.29852294921876&zL=10). As demonstrated by the NREL map, the Project site has particularly good DNI due to its distance from the coast and higher elevation. Also, Section 4.2.4 of Chapter 4, Project Alternatives, of the Draft EIR discusses alternative locations for the Project site. The Draft EIR states that the Project site satisfies both Objectives 4 and 6 as it is located as near as possible to existing SDG&E transmission infrastructure, and it has excellent solar attributes because of its elevation and the Jacumba area climate zone provides hot summers and mild winters with minimal coastal marine influence. The Section concludes that “there are no other known readily available parcels of undeveloped land of similar size in the eastern portion of the County that could accommodate development of the Proposed Project that have not already been considered and rejected for development of a similar solar project, provide adequate site accessibility, and/or could be acquired by the Applicant within a reasonable period of time.”

O6-22 The commenter states that the Objective 7 could be satisfied “from any project location not just JVR” and that the Proposed Project “will provide very few if any real local jobs in the Jacumba / Boulevard area.” The comment states that “[d]evelopers generally bring in out-of-state workers to build their projects, based on our first-hand experiences with multiple major projects.” This comment provides Boulevard Planning Group’s perspective on Objective 7, which states “Develop a utility-scale solar energy facility within San Diego County that supports the economy by investing in the region and creates construction jobs.” In response, the applicant has agreed to execute a project labor agreement, which guarantees that the applicant’s general contractor will give priority to qualified individuals from the local San Diego County workforce. Further, the County has the discretion to “identify and pursue a particular project designed to meet a particular set of objectives.” (*San Diego Citizenry Group v. County of San Diego* (2013) 219 Cal.App.4th 1, 14; *California Oak Foundation v. Regents of University of California* (2010) 188 Cal.App.4th 227, 276-77.) This comment does not raise a specific issue with the adequacy of the analysis of the Proposed Project in the Draft EIR; therefore, no specific response will be provided.

O6-23 The commenter states that there have been cases of Valley Fever reported in the Wagon Wheel trailer park located on the east end of Jacumba. The comment states that the County should investigate this assertion to determine if they are true and, if so, whether the Project site is the source. The commenter does not indicate when these reports arose, or whether any report was provided to the County. In response, please refer to Sections 2.2.1.3 and 2.2.3.2 of Chapter 2.2, Air Quality, which adequately discusses and analyzes Valley Fever, its incidence in the Project area (for the County and statewide

averages), and the Proposed Project’s potential for causing exposure to Valley Fever for sensitive receptors. In particular, the Section states that there have been no cases of Valley Fever between 2008 and 2019 in the 91934 zip code, which contains the Project site. (Nelson 2018; Coccidioidomycosis Case Counts and Rates by Zip Code, 2010-2019, County Public Health Services, Epidemiology and Immunization Services Branch, January 8, 2021). Further, the Section discusses the Proposed Project’s compliance with SDAPCD Rule 55, which limits the amount of fugitive dust generated during construction through watering, using magnesium chloride for dust suppression on unpaved roads, and limiting speed on unpaved roads to 15 miles per hour. Workers on site would be protected through compliance with regulations pertaining to Valley Fever, which require: (1) the reporting of any serious injury or illness, or death, of an employee occurring in a place of employment or in connection with any employment to the nearest District Office of the Division of Occupational Safety and Health; (2) an Injury and Illness Prevention Program to identify and evaluate workplace hazards; (3) harmful exposures to be prevented by engineering and/or administrative controls whenever feasible; (4) when effective controls are not feasible, respirators shall be used and provided by the employer when such equipment is necessary to protect the health of the employee; and, (4) when necessary, the establishment and maintenance of a respiratory protection program. The Section concludes: “Based on the low incidence rate of Coccidioidomycosis in the Proposed Project region and in greater San Diego County, and the Proposed Project’s implementation of dust control strategies, it is not anticipated that earth-moving activities during Proposed Project construction and decommissioning would result in exposure of nearby sensitive receptors to Valley Fever.” The Proposed Project would also implement mitigation measure **M-AQ-2** to minimize fugitive dust from Project construction.

The *Coccidioides* fungus that causes Valley Fever is generally found in the upper 20 to 30 centimeters of the soil horizon, especially in virgin, undisturbed soils. Areas that have been cultivated or are heavily vegetated, continually wet, paved or oiled, in higher elevations, or where commercial fertilizers have been applied are less likely to contain the fungus. Considering the Project site’s past cultivation, the low incidence rate, the dust control measures to be imposed by the Project, substantial evidence supports the Draft EIR’s conclusion the Proposed Project will not result in exposure of nearby sensitive receptors to Valley Fever.

- O6-24** This comment pertains to the County’s proposal to streamline the environmental review process for renewable energy projects within unincorporated area of the County. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.

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- O6-25** The commenter states that there are double standards for power shut off events in the County—with east County residents having their power shut off, “while the existing commercial industrial wind turbines and solar projects are allowed to continue to operate and ship power through [east County] neighborhoods to other distant communities.” The comment also raises wildfire and aesthetic impacts related to renewable energy projects in the eastern portions of the County. The comment concludes that as a matter of “Equity and Social Justice, either everything should be shut-off during these PSPS events or nothing should be shut-off.” In response, the comment does not raise a specific issue with the analysis in the Draft EIR and, as such, no specific response is required. However, please refer to Section 2.1, Aesthetics, and Section 2.12, Wildfire, of the EIR, which analyze the Proposed Project’s individual and cumulative impacts to aesthetic and visual resources and wildfire risks. Further, the County does not have authority over power shut off decisions; that authority lies with other entities.
- O6-26** The commenter states that because the Proposed Project is in close proximity to the Jacumba community, a condition should be added requiring the Proposed Project “be included in and required to abide by any PSPS shut-off events that impact Jacumba residents and businesses.” In response, the comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to EIR Section 2.6, Hazards and Hazardous Materials, and Section 2.12, Wildfire, which analyze potential wildfire impacts caused by development of the Proposed Project. These sections conclude that with implementation of mitigation measures **M-WF-1** (Fire Protection Plan), **M-WF-2** (Construction Fire Protection Plan), and **M-WF-3** (Fire Protection and Mitigation Agreement), the Proposed Project’s individual and cumulative potentially significant impacts related to wildfires and wildfire hazards would be reduced to a less than significant level. Further, whether a facility’s power is curtailed as a safety measure is outside the County’s control.
- O6-27** The commenter states the Boulevard Planning Group’s opposition to the Project and the overriding of significant environmental impacts. In response, the County acknowledges the Boulevard Planning Group’s opposition to the Proposed Project. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-28** The commenter generally states the Boulevard Planning Group’s opposition to the Proposed Project and the overriding of significant environmental impacts. In response, the County acknowledges the Boulevard Planning Group’s opposition to the Proposed Project. Please also refer to Global Response GR-1 Socioeconomics and

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- Environmental Justice regarding the relationship between CEQA and socioeconomic considerations. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-29** The commenter requests that the comment letter be included in the record for the Project and states the Boulevard Planning Group’s opposition to the Proposed Project. In response, the County will include the letter in the record for the Proposed Project and notes Boulevard Planning Group’s opposition to the Proposed Project.
- O6-30** This comment introduces the Boulevard Planning Group’s comments in response to the Notice of Preparation (NOP) of the Draft EIR for the Project, and states that the Boulevard Planning Group voted, on April 4, 2019, to oppose the Proposed Project, with five votes in favor, one vote abstaining and one vote absent. A NOP is a brief notice issued to Responsible Agencies, Trustee Agencies, the Office of Planning & Research, Federal Agencies, and interested parties giving notice that the Lead Agency plans to prepare an EIR for a project. (CEQA Guidelines § 15375.) According to the CEQA Guidelines, “The purpose of the notice is to solicit guidance . . . as to the scope and content of the environmental information to be included in the EIR.” (*Ibid.*) Comments O6-30 through O6-169 were provided prior to the publication of the Draft EIR. The County acknowledges the Boulevard Planning Group’s opposition to the Proposed Project. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-31** The commenter states that April 8, 2019 comment deadline on the NOP was one of two days that SDG&E informed locals of an eight-plus hour power shut off for areas in east County. The comment states that these power shut offs happen too often, “while energy from these massive projects continues to flow to distant customers.” In response, please refer to Responses to Comments O6-25 and O6-26. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-32** The commenter quotes the County of San Diego’s Department of Planning & Development Services’ mission and states that Planning & Development Services “should step up to protect and defend residents the way San Bernardino and Los Angeles County has—instead of overriding significant and cumulatively significant impacts.” In response, the decision-making power to approve or deny the various aspects of the Proposed Project rests with the Board of Supervisors, not the Department of Planning & Development Services. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.

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- O6-33** The commenter states that the County of San Bernardino banned industrial scale solar on private land and requests that the County do the same “in order to prevent further damage and harm to predominantly low-income environmental justice communities that are already bearing an undue and disproportionate burden of these massive and incompatible energy projects that serve distant consumers.” In response, please refer to Global Response GR-1 Socioeconomics and Environmental Justice, which discusses the relationship between CEQA and socioeconomic considerations. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-34** The commenter summarizes an article in the Los Angeles Times that describes the County of San Bernardino’s action with respect to the development of renewable energy projects. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-35** The commenter summarizes an article in PV-Magazine that describes the County of San Bernardino’s action with respect to the development of renewable energy projects. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-36** The commenter summarizes an article describing the County of Los Angeles’ action to “ban utility-scale wind turbines in the unincorporated areas of Los Angeles County . . . [and] direct[ion] [to] the Department of Public Health to report back in 60 days on a protocol for requiring soil tests to detect Valley Fever when developing renewable energy projects in the Antelope Valley.” The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-37** The commenter states that, as of the date of the NOP, the Project application is incomplete and the Project lacks information regarding grading plans and the loss of top soil. In response, the County has posted the Proposed Project’s plot plans and grading plans to its public website for the Proposed Project and the Draft EIR has been circulated for public review. As described in Chapter 1 of the Final EIR, grading is expected to be balanced on site, with approximately 280,000 cubic yards of cut redistributed across the site. In other words, there would no loss of topsoil as a result of Proposed Project development.
- O6-38** The commenter states that greenhouse gas emissions must be fully analyzed in the Draft EIR, including “life-cycle analysis and long-haul transportation of project components, off-gassing from electrical and energy storage components, loss of carbon sequestration through soil disruption and grading, and potential toxic fumes generated

by project fires.” In response, please refer to Section 3.1.3, Greenhouse Gas Emissions, of the EIR, which analyzes the Proposed Project’s greenhouse gas emission impacts. Section 3.1.3.5 of concludes that the Proposed Project would be consistent with applicable greenhouse gas reduction plans, and the Proposed Project would avoid more greenhouse gas emissions than it would generate. With respect to lifecycle analysis of greenhouse gas emissions, please refer to the Response to Comment O6-16. With respect to greenhouse gas emissions resulting from loss of carbon sequestration and off-gassing, those emissions sources are analyzed in Section 3.1.3.3.1 of Section 3.1.3, Greenhouse Gas Emissions. The section explains that the estimated total one-time loss of sequestered carbon from land use conversion for the Proposed Project would be 8,503 MT CO₂, or 243 MT CO₂ per year amortized over 35 years. Proposed Project GHG emissions generated from operational activities, including amortized construction and decommissioning, are estimated to be approximately 758 MT CO₂e per year in 2022. (See Tables 3.1.3-3 and 3.1.3-6; see also Appendix P, Greenhouse Gas Technical Report, § 3.3.) When account for the offset of greenhouse gas emissions from fossil-fuel power plants through 2044, the project would avoid a net 396,721 MTCO₂e. With respect to greenhouse gas emissions from wildfires caused by the Proposed Project, any such emissions are speculative given the Proposed Project will not result in any significant and unavoidable wildfire impacts and, as such, the emissions not required to be analyzed under CEQA. (CEQA Guidelines, § 15145.)

- O6-39** The commenter states that the Proposed Project is not needed, there are better alternatives closer to consumers, and the Project’s impacts will outweigh any benefits. In response, the County acknowledges the Boulevard Planning Group’s opposition to the Proposed Project. Please also refer to Chapters 2 and 3 of the EIR, for a discussion of environmental impacts associated with the Proposed Project, and Chapter 4, Project Alternatives, which discusses potential alternative locations for the Proposed Project.
- O6-40** The commenter states that there is no proposed open space or trails associated with the Proposed Project. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to mitigation measure **M-BI-3**, which requires the Proposed Project to preserve 435 acres of sensitive vegetation communities, special-status plant species, and habitat for special-status species within a biological open space easement.
- O6-41** The commenter states that the Project will destroy the Jacumba community’s tourism, existing farmland, housing options, historic buildings, open space, habitat, and visual resources. The comment states that the Proposed Project will cause noise impacts as well. In response, the comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.

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- However, please refer to Global Response GR-1 Socioeconomics and Environmental Justice, which discusses the relationship between socioeconomic considerations and CEQA. Please also refer to Chapters 2 and 3 of the Draft EIR, which discuss and analyze potential impacts to farmland, noise, land use and planning, cultural resources, biological resources, and aesthetic and visual resources that may be caused by the development of the Proposed Project.
- O6-42** The comment states that better alternatives are available to achieve the Project objectives, while avoiding impacts to rural communities, public health and safety, and property values. The commenter references an article discussing the potential for generating 4,000 megawatts through siting solar panels in the City of San Diego. In response, the County analyzes a reasonable range of alternatives in Chapter 4, Alternatives, of the Draft EIR. One of the alternatives considered and rejected in the Draft EIR is the Distributed Generation and Storage Policy (Rooftop Solar Panels) Alternative. (Chapter 4, Alternatives, Section 4.2.2.) The Draft EIR found that the Alternative would result in significant reduction in impacts as compared to the Proposed Project, but that the Alternative is outside the control of, and could not be implemented by, the Project applicant, the County or other counties where the Proposed Project’s electricity would be utilized in a reasonable period of time. Further, the Draft EIR concluded that the Alternative would not meet most of the Project objectives.
- O6-43** The commenter references and summarizes articles explaining the potential renewable energy production from a distributed generation project. In response, please refer to Response to Comment O6-42. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-44** The commenter states that the articles and surveys referenced in Comments O6-42 and O6-43 only cover the City of San Diego, and not the County. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-45** The comment refers to two proposals by the Coalition for Clean Energy regarding distributed renewable energy projects. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to Response to Comment O6-42.
- O6-46** The commenter states that there is no need “to dominate and destroy already overburdened and disproportionately impacted and predominately low-income rural communities like Jacumba Hot Springs and Boulevard. In response, please refer to

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- Global Response GR-1 Socioeconomics and Environmental Justice, which discusses the relationship between socioeconomic considerations and CEQA.
- O6-47** The commenter references comments made by the California Public Utilities President Michael Picker suggesting that California’s path toward 100 percent renewable power could result in situation similar to the crisis the state faced in 2000 and 2001. The commenter also cites to the Institute for Energy Research assertion that rapid abandonment of existing reliable energy sources makes the state vulnerable to blackouts. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-48** This commenter states that environmental justice applies to the Jacumba community, where many residents are low-income, elderly, and suffer from pre-existing health issues. The comment also notes that the Proposed Project dwarfs the size of the Jacumba community. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to Global Response GR-1 Socioeconomics and Environmental Justice, which discusses the relationship between socioeconomic considerations and CEQA. Please also refer to Section 2.2, Air Quality, and Section 3.1.4, Land Use and Planning, which analyze the potential air quality and land use impacts that may result from development of the Proposed Project.
- O6-49** The commenter states that CEQA requires a government agency to fully consider and disclose the foreseeable consequences of its actions and avoid unnecessary environmental risks. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-50** The commenter references the California Office of the Attorney General’s Health in All Policies Task Force that is charged with identifying “priority programs, policies, and strategies to improve the health of Californians while advancing the goals of improving air and water quality, protecting natural resources and agricultural lands, increasing the availability of affordable housing, improving infrastructure systems, promoting public health, planning sustainable communities, and meeting the climate change goals.” The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to Global Response GR-1 Socioeconomics and Environmental Justice, which discusses the relationship between socioeconomic considerations and CEQA.
- O6-51** The commenter describes the goals of the Health in All Policies Task Force, including that all California residents live in safe, healthy and affordable housing; decision-

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- makers are informed about health consequences in policy decision; environmental justice and healthy communities; and the definition of “environmental justice” in Government Code section 65040.12. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to Global Response GR-1 Socioeconomics and Environmental Justice.
- O6-52** The commenter states that greenhouse gas emissions, population and housing, and recreation should be analyzed in the Draft EIR and Major Use Permit for the Project. In response, please refer to Section 3.1.3, Greenhouse Gas Emissions, Section 3.1.5, Parks and Recreation, and Section 3.2, Effects Found Not to be Significant During Initial Study, which analyze the Proposed Project’s potential impacts to greenhouse gas emissions, population and housing, and recreation.
- O6-53** The commenter states that the Proposed Project effects on human health, social, and economics are part of the environment and must be fully analyzed, including quality of life, use and enjoyment of property, property values, and potential loss of life-time investments. The commenter also states that the Project will increase wild fire ignition sources and firefighting impediments/hazards, which may have a corresponding impact on local fire insurance costs or loss of insurance. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to Global Response GR-1 Socioeconomics and Environmental Justice. Please also refer to the Section 2.12, Wildfire, of the EIR, which analyzes and describes the potential wildfire and related impacts associated with the Proposed Project.
- O6-54** The commenter states fire fighters will need to wait for a fire to burn out of the Project area due to “electrical/toxic fumes hazards,” which will allow a fire to increase in size and blow out of control. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to Section 2.12.3.2 which discusses and analyzes potential impacts as a result of wildfire risks created by potential development of the Proposed Project.
- O6-55** The commenter states that “BayWa r.e. advertises that they are part of the €6 billion BayWa Group.” The comment also states that “corporate gain often results from externalizing many Project related costs.” The commenter further requests that the Project applicant be required to offer “Property Value Protection Agreements” to community members to mitigate the negative impacts caused by the Project. The comment does not raise an issue regarding the adequacy of the analysis contained

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- within the Draft EIR; therefore, no further response is required. However, please refer to Global Response GR-1 Socioeconomics and Environmental Justice.
- O6-56** The commenter states that the Project applicant should offer “protection agreements . . . for low-income renters who have few if any viable or affordable alternatives for moving if the project becomes unbearable.” The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to Global Response GR-1 Socioeconomics and Environmental Justice.
- O6-57** The commenter states that the Draft EIR must analyze greenhouse gas emissions from the Proposed Project’s construction and operation, and its life-cycle emissions. In response, please refer to Section 3.1.3, Greenhouse Gas Emissions, of the EIR which analyzes potential greenhouse gas impacts caused by the development of the Proposed Project. CEQA does not require an analysis of the Proposed Project’s “life-cycle emissions.” Please also refer to Response to Comment O6-16.
- O6-58** The commenter cites to an article purporting to explain “the problems and struggles to keep photovoltaics green including life-cycle issues.” In response, CEQA does not require an analysis of the Project’s “life-cycle emissions.” Please refer to Response to Comment O6-16.
- O6-59** The commenter states that the Proposed Project is too close to residences and the Project may cause residences to become toxic and unlivable due to noise, vibrations, electrical pollution and more. In response, Section 2.9, Noise, and Section 3.1.4, Land Use and Planning, of the EIR analyze the Proposed Project’s potential impacts with respect to noise and land use and planning. Please also refer to Response to Comment O6-10 regarding “electrical pollution” and Global Response GR-4 Electromagnetic Field Impacts.
- O6-60** The commenter states that the Proposed Project will create noise and visual impacts to the Jacumba community park. In response, Section 2.1, Aesthetics analyzes the Proposed Project’s impacts to focal or panoramic vistas, including views from Jacumba Community Park. The Proposed Project has been revised in the Final EIR to include an increased setback from the park, as described in Chapter 1. Mitigation measures would include landscaping and screening on the perimeter fencing, however, the Proposed Project would result in a significant and unavoidable impact to views from the park despite the implementation of mitigation measures. Section 2.9, Noise, concludes that there will be no significant impacts to adjoining properties, including Jacumba Community Park, with implementation of mitigation measures.

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- O6-61** The commenter states that the Proposed Project is divided by Old Highway 80, which is frequently used for walking and bicycling. The commenter also states that the Project will negatively impact “Proposed Bicycle Facilities” in the Activity Transportation Plan. In response, the comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to Section 2.1, Aesthetics, and Section 3.1.7, Transportation, of the EIR, which analyze the Proposed Project’s potential impacts to aesthetic and visual resources and the Active Transportation Plan. Section 2.1, Aesthetics, concludes that the Proposed Project would result in significant and unavoidable impacts to views from Old Highway 80. Section 3.1.7, Transportation, concludes that the Proposed Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
- O6-62** The commenter states that the Proposed Project will impact views from public and private land used for recreation. The commenter further states that the Project will also generate noise impacts to these areas. In response, Section 2.1, Aesthetics of the EIR analyzes the Proposed Project’s impacts to focal and/or panoramic vistas from public roads, trails within an adopted County or State trail system, scenic vistas or highways, and recreational areas. Implementation of mitigation measures would reduce impacts; however, impacts to aesthetics and visual resources would remain significant and unavoidable. Section 2.9, Noise analyzes potential noise impacts created by the construction and operation of the Proposed Project. Noise impacts would be reduced to less than significant with implementation of mitigation measures.
- O6-63** This commenter states that Round Mountain is adjacent to the Proposed Project and is located mostly within Anza Borrego Desert State Park based on Figure 1-3 Project Environmental Setting in the JVR Energy Park Project Description dated November 2018. In response, for clarification Figure 3.1.5-1 in the Draft EIR (dated October 2020) shows that the eastern portion of Round Mountain is within the Project site and the western portion is within federal Bureau of Land Management lands.
- O6-64** The commenter states that views from gliders flying over the Project site will be impacted, and the area will not be as safe for gliders. In response, Section 2.6.3.4, Airport Hazards of the EIR analyzes the Proposed Project’s potential to result in a safety hazard for a project located within an airport land use plan. Section 3.1.4, Land Use and Planning analyzes the Proposed Project’s consistency with the Jacumba Airport Land Use Compatibility Plan. Please refer to Global Response GR-5 Airport Impacts. The Proposed Project’s impacts to glider operations would be less than significant.

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- O6-65** The commenter states that the regional map used in the NOP should have included the solar project components. In response, please refer to Chapter 1 of the EIR for figures of the proposed solar facility components. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-66** The commenter states that the Proposed Project footprint “dwarfs” the Jacumba community. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-67** The commenter states that the Proposed Project is “too large and crowds the town,” and should be denied or vastly reduced with increased setbacks from certain areas. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to Chapter 4, Project Alternatives, which analyzes two alternatives to the Project—the Community Buffer Alternative and the Reduced Project Alternative—which include increased setbacks. Please also refer to Global Response GR-6 Alternatives. Further, the Proposed Project has been revised to include increased setbacks along Old Highway 80 and adjacent to Jacumba Community Park. Please refer to Section 1.2 Project Description in the Final EIR.
- O6-68** The commenter states that the Project description is not compatible with the Mountain Empire Subregional Plan or the Jacumba Vision Statement. In response, Section 3.1.4 Land Use and Planning (see Table 3.1.4-5) of the Draft EIR provides an analysis of the Proposed Project’s consistency with the Mountain Empire Subregional Plan and the Jacumba Vision Statement. The EIR concludes that the Proposed Project consistent with the policies and goals contained therein.
- O6-69** The commenter restates the Jacumba Vision Statement. In response, please refer to Response to Comment O6-68. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-70** The commenter restates a portion of the Mountain Empire Subregional Plan. In response, please refer to Response to Comment O6-68. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-71** The commenter restates a portion of the Mountain Empire Subregional Plan. In response, please refer to Response to Comment O6-68. The comment does not raise an

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- issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-72** The commenter restates a portion of the Mountain Empire Subregional Plan. In response, please refer to Response to Comment O6-68. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-73** The commenter restates a portion of the Mountain Empire Subregional Plan. In response, please refer to Response to Comment O6-68. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-74** The commenter restates a portion of the Mountain Empire Subregional Plan. In response, please refer to Response to Comment O6-68. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-75** The commenter states that the 2003 designation of Jacumba Hot Springs as a Colonia was intended to help the Jacumba Community Services District (JCSD) qualify for grants to upgrade and improve its water system to serve the existing community, not to serve commercial industrial utility projects. The commenter restates a portion of the Mountain Empire Subregional Plan. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, the Draft EIR analyzes groundwater resources pursuant to the County’s Groundwater Resource Guidelines (County of San Diego 2007c.). Section 2.7.3.4 Groundwater Resources and the Groundwater Resources Investigation Report (Appendix J) of the Draft EIR describes the evaluation of local groundwater resources and potential impacts from the Proposed Project. Section 2.7.3.4 of the Draft EIR concludes that the Proposed Project will have less than a significant impact on groundwater.
- O6-76** The commenter asks whether any JCSD wells be used for the Proposed Project and how does this comply with the colonia designation and related grants. In response, Section 2.7.3.4 Groundwater Resources of the Draft EIR identifies that the Proposed Project will pump groundwater from existing onsite wells and would not utilize water from the JCSD.
- O6-77** The commenter states that Jacumba is not immune to flooding and provides information on flooding from Hurricane Kathleen in 1976 and photographs of flooding from a 2014 East County Magazine article. In response, the Draft EIR Section 2.7

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- Hydrology and Water Quality and the Drainage Study (Appendix I to the EIR) analyze potential flooding based on the County’s Hydrology Guidelines (County of San Diego 2007a). The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-78** The commenter asks how many square feet are represented by the Project’s solar panels. In response, Chapter 1, Section 1.2.2.1, Technical Considerations, of the Final EIR has been updated to state that the “PV modules will measure approximately 7.5 feet in length and 3.7 feet in width (or 27.75 square feet).”
- O6-79** The commenter states that solar panel module selection should be disclosed “during public comment” so the public can research any specific issues with the module as well as the life of the module. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. Further, the Proposed Project’s engineering and equipment selection is not complete and, as such, the specific module to be used for the Project has yet to be determined. The solar panel module will be determined according to the engineering and market availability. However, the Draft EIR analyzes the most conservative assumption for the solar panels—that the panels will have a maximum height above graded ground surface of 12 feet, and that the equipment would last 35 years. (See Chapter 1 of the EIR)
- O6-80** The commenter states that the driving of the solar panel’s poles into the ground should be analyzed for noise and vibrations. In response, Section 2.9, Noise, of the EIR analyzes the Proposed Project’s potential to cause noise impacts. The EIR concludes that the Proposed Project’s construction would not cause significant noise or ground borne vibration impacts with implementation of mitigation measure **M-NOI-3** Construction Management Plan.
- O6-81** The commenter states that the “electrical collection system” should be buried. In response, please refer to Section 1.2 Project Description in Chapter 1 of the EIR which states that the AC voltage collection system for the Proposed Project will be underground in trenches up to 3 to 4 feet deep and 2 to 3 feet wide. The trenches would be filled with base material above and below the conductors and communications lines to ensure adequate thermal conductivity and electrical insulating characteristics.
- O6-82** This comment includes a photo taken in 2013 of another solar project built in Imperial County. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.

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- O6-83** The commenter states that the number of inverter/transformer units, the size of the units, and the noise produced by the units should be disclosed. The comment also states that the type of the inverters/transformers should be disclosed. In response, Section 1.2 Project Description of Chapter 1 in the EIR states that inverter/ transformer platforms would be installed at 25 locations, adjacent to the battery storage containers throughout the solar facility (See Figure 1-2 and the Figure 1-3 Enlarged Site Plan series). At each location, two inverters and one transformer would be installed on a metal platform, referred to as a skid. Each metal skid would be approximately 8 feet wide and 20 feet long. The skids would be mounted above the 100-year flood elevations. Further, the noise generated by stationary equipment, including the inverter/transformer units is analyzed in Section Chapter 2.9, Noise. (See also Appendix M, Noise Acoustical Assessment Report.) The final engineering and equipment selection has not been finalized for the Proposed Project, and the equipment actually implemented will depend upon engineering and market availability. Mitigation measure **M-NOI-1** will ensure that the equipment and placement within the site will comply with the County’s Noise Ordinance. Noise impacts during the Proposed Project would be less than significant with implementation of mitigation measures.
- O6-84** The comment states that electromagnetic fields (EMF) electromagnetic interference and electrical pollution must be addressed to avoid stray energy moving off-site into homes and businesses. The comment cites to a website post about reducing EMF from solar panels to avoid damage to other electronic equipment. In response, the referenced website does not provide persuasive evidence of the health hazards associated with exposure to EMF from the Proposed Project. Chapter 1 of the EIR describes the Project infrastructure and that it will be constructed in compliance with all applicable local, state, and federal laws, regulations and codes. Please also refer to Global Response GR-4 Electromagnetic Field Impacts.
- O6-85** The commenter cites to an article about French farmers alleging wind turbines and solar panels have killed hundreds of their cows due to stray electricity travelling through the ground. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to Global Response GR-4 Electromagnetic Field Impacts.
- O6-86** The commenter cites to a study about the effect of chronic exposure to extremely low-frequency electromagnetic fields on sleep quality, stress, depressing and anxiety. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to Global Response GR-4 Electromagnetic Field Impacts.

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- O6-87** The commenter cites to a study about electromagnetic fields on cytokines of innate and adaptive immunity. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to Global Response GR-4 Electromagnetic Field Impacts.
- O6-88** The commenter cites to EUROPAEM EMF Guideline 2016 for the prevention, diagnosis and treatment of EMF-related health problems and illnesses. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to Global Response GR-4 Electromagnetic Field Impacts.
- O6-89** The commenter cites to a study on the effects of exposure to electromagnetic fields. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to Global Response GR-4 Electromagnetic Field Impacts.
- O6-90** This comment includes a table showing noise measurements from inverters at a solar project in Clackamas County, Oregon, from an article published in 2016. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to Response to Comment 06-83.
- O6-91** The commenter states that there is potential for the collector substation noise to leave the site through air and ground pressure waves that can be perceived at a distance. In response, Section 2.9 Noise of the EIR evaluates Proposed Project for potential noise impacts. The EIR also includes the Acoustical Assessment Report for the JVR Energy Park Project (Appendix M). The EIR analyzes the Proposed Project’s operational impacts to sensitive land uses located within the vicinity of the Project site. Based on the County’s Guidelines for Determining Significance – Noise (County of San Diego 2009a) and CEQA Guidelines Appendix G, the Draft EIR concludes that the Proposed Project, with mitigation measures (**M-NOI-1** and **M-NOI-2**), would have less than significant noise impacts. This comment does not raise a specific issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.
- O6-92** The commenter cites to a website that includes recommendations related to noise management related to collector substation. In response, please refer to Response to Comment O6-91. This comment does not raise a specific issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.

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- O6-93** The commenter recommends noise abatement methods that should be considered for the collector substation. In response, please refer to the Response to Comment O6-91. This comment does not raise a specific issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.
- O6-94** The commenter states the switching gear would be 60 feet tall and should require a height limit waiver. The commenter also states that remotely controlled SCADA systems create radio frequency electromagnetic radiation and potentially other emissions if the system is wireless. In response, the Proposed Project requires a discretionary Major Use Permit (MUP), which may authorize development with a height in excess of 60 feet. (San Diego County Code Section 4610). Table 1-3 in Chapter 1 of the Draft EIR identifies that the Proposed Project will require a MUP approved by the County. In regard to the SCADA system, the Federal Communications Commission has evaluated the health effects associated with radio frequency devices and regulates the use of such devices. (Federal Communications Commission, FCC Policy on Human Exposure to Radio Frequency Electromagnetic Fields, <https://www.fcc.gov/general/fcc-policy-human-exposure> (accessed on Dec. 13, 2020).) Should the Project employ any radio frequency devices, the Proposed Project will employ devices approved of by the Federal Communications Commission
- O6-95** The commenter provides photographs of solar project components located in western Imperial County to depict the visual impact of conversion of farmland/open space into an industrial scale solar project. The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to Section 2.1, Aesthetics, of the EIR which analyzes the Proposed Project’s potential impacts to aesthetics and visual resources.
- O6-96** The commenter states that energy storage systems are fire hazards. In response, Section 2.12 Wildfire and Section 2.6.3.7 Wildland Fire Hazards of the EIR describes the fire and hazard protective measures associated with the battery energy storage system of the Proposed Project. The EIR states that the energy storage systems will comply with the National Fire Protection Association’s new 2020 Standards for the Installation of Energy Storage Systems (NFPA 855) and all applicable standards when building permits are issued. With implementation of mitigation measures **M-WF-1**, **M-WF-2**, and **M-WF-3**, the Proposed Project’s impacts associated with wildfire hazards would be less than significant.
- O6-97** The commenter asks whether energy storage needed or necessary. In response, please refer to Response to Comment O6-20. The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.

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O6-98 The commenter states that 26 enclosures that are 45 feet long, 9 feet high and 8 feet wide will stand out visually from the approximately 300,000 photovoltaic modules. In response, please refer to Section 2.1 Aesthetics, which analyzes the potential impacts to aesthetics and visual resources from the Proposed Project. The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.

O6-99 The commenter states that the 26 enclosures will require 16 air conditioning units that will consume lots of energy and make lots of noise/vibrations that will affect the rural area. In response, Section 2.9 Noise of the EIR evaluates noise and vibration impacts based on specified thresholds identified in Appendix G of the CEQA Guidelines and in the County of San Diego’s Guidelines for Determining Significance – Noise (County of San Diego 2009a). Section 2.9.4.2, NSLU Affected by Airborne Noise – Exterior (Non-Construction), of the EIR describes the analysis of air conditioning units associated with the battery energy storage systems. The EIR concludes that the predicted noise levels associated with operation of on-site stationary equipment, including the battery container cooling systems, as currently shown on the Plot Plans would not result in exceedances of the County’s noise standards. However, if the layout and/or types of equipment were to change from what is studied in the EIR, stationary operational noise levels may have the potential to exceed County noise standards (**Impact NOI-1**). Implementation of mitigation measure **M-NOI-1** would reduce this potential impact to less than significant. Section 2.9.4.8, Excessive Groundborne Vibrations, of the Draft EIR similarly concludes that operations will not create ground borne vibrations perceptible by sensitive receptors.

Further, the Project’s energy demand is analyzed in Section 3.1.2 of the EIR. The Section concludes: “The Proposed Project would use 99 MWh of electricity over its lifetime while it would generate approximately 7,390,568 MWh of renewable electricity. As such, the Proposed Project would not result in the wasteful or inefficient use of electricity” and any impacts associated with the Project’s energy demand would be less than significant.

O6-100 The commenter cites that San Diego County Gas and Electric (“SDG&E”) has reportedly met the California Public Utilities Commission mandated 165 megawatts of energy storage procurement with the 30 MW Escondido ESS project and five other systems that all use lithium-ion battery technology. In response, please refer to Response to Comment O6-20. The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.

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- O6-101** The commenter provides photographs of battery storage containers at SDG&E’s Escondido Energy Storage facility as an example the appearance of the proposed enclosures. The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-102** The commenter states that use of batteries to meet peak energy demands requires the batteries to be fully charged and discharged each day, which strains and degrades lithium batteries. The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-103** The commenter states that SDG&E’s contract requires the Escondido Energy Storage facility to maintain battery capacity and performance for 10 years, which is typically done by oversizing the battery project or adding additional cells during operation. As a result, the commenter indicates that batteries will be added as old batteries degrade and degraded batteries are less stable. The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-104** The commenter states that Invenergy has already proposed a 100-megawatt Energy Storage System next to SDG&E’s rebuilt Boulevard Substation. The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-105** The commenter references that some energy storage systems include cooling systems that use ethylene glycols, and the 2018 International Fire Code for Battery Room Protection requirements for fire protection signage and systems with toxic gases. The commenter also asks whether batteries release toxic/highly toxic gases during charging, discharging, and normal use. In response, the EIR analyzes the Proposed Project based on the County’s Guidelines for Determining Significance, Hazardous Materials and Existing Contamination (County of San Diego 2007a) and the County’s Guidelines for Determining Significance and Report Format and Content Requirements: Wildland Fire and Fire Protection (County of San Diego 2010). Section 2.6.3.3 Hazardous Materials and Section 2.6.3.7 Wildland Fire Hazards of the Draft EIR describes the fire and hazard protective measures associated with the energy storage component of the Project. Section 2.6.3.3 states that the energy storage systems will comply with the National Fire Protection Association’s new 2020 Standards for the Installation of Energy Storage Systems (NFPA 855) and all applicable standards when building permits are issued.
- O6-106** The commenter cites to articles and information about the gas safety risks associated with fires related to lithium ion batteries. In response, Section 2.12 Wildfire of the

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Draft EIR analyzes the fire safety control measures associated with the battery energy storage containers. Specifically, the Draft EIR states: “Newer battery technologies have minimized the occurrence of thermal runaway through a system of protections including internal cell monitoring and partitioning; use of nonflammable chemicals; container design and features; ventilation, and air-conditioning systems; and inert gas fire suppression systems.” (Draft EIR, Section 2.12.3.2.) Section 2.6, Hazards and Hazardous Materials, of the Draft EIR further describes the fire protection measures designed to avoid potential exposure of hazardous gases to emergency personnel in the event of a fire. (Draft EIR, Section 2.6.3.3.)

O6-107 The commenter provides information related to hydrogen fluoride (hydrofluoric acid) and its potential health impacts. In response, Section 2.12, Wildfire, and Section 2.6, Hazards and Hazardous Materials, of the Draft EIR describe the fire protection measures designed to avoid potential exposure of hazardous gases to emergency personnel in the event of a fire. (Draft EIR, Sections 2.12.3.2 and 2.6.3.3.) This comment does not raise a specific issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.

O6-108 The commenter asks will the 1,500-foot long gen-tie be placed underground similar to the Tule Wind’s requirement to place its gen-tie line underground. In response, Section 1.2 Project Description, of Final EIR describes the proposed overhead 138 kV transmission line tie-in, which are part of the Switchyard Facilities. The proposed overhead transmission line tie-in would require six spans of wire, totaling approximately 1,860 feet, and up to five steel transmission poles. The poles would range from 70 to 115 feet above the ground’s surface. In Chapter 4, Alternatives, the Draft EIR considered a similar proposal (the ECO Substation Connection Alternative (No Switchyard)) that would eliminate the Proposed Project’s switchyard and instead underground a 2.5-mile line to the East County Substation. The EIR considered but rejected the Alternative because it would increase the Proposed Project’s environmental impacts, it is unknown whether there is capacity at the ECO substation to accommodate the Proposed Project, and it is unknown whether SDG&E would permit use of the easement corridor for the underground line or permit use of the substation. Further, changing the Project’s point of interconnection to the ECO Substation would require termination of the Large Generator Interconnection Agreement (LGIA) and a new interconnection study, which would delay the Project and likely prevent the Project from obtaining the maximum Investment Tax Credit.

O6-109 The commenter states that SCADA systems create radio frequency electromagnetic radiation and potentially other emissions that can have adverse impacts on people,

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- wildlife, and through electromagnetic interference. In response, please refer to Response to Comment O6-94.
- O6-110** The commenter states that the Project access road off of Carrizo Gorge Road should be the main Project entrance to reduce traffic impacts for Jacumba area residents. In response, as described in Section 1.2 Project Description, of the EIR, the Proposed Project proposes six access driveways. Four of the access driveways would be provided off of Carrizo Gorge Road and two driveways would be provided off on Old Highway 80. Please refer to the enlarged Figure 1-3 series in the Final EIR.
- O6-111** The commenter refers to transportation permits related to the movement of vehicles or loads exceeding the limitations on the size and weight limits contained in the California Vehicle Code. In response, Section 3.1.7, Transportation, of the Draft EIR identifies that the Proposed Project will have to obtain special permit from Caltrans to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code for the construction phase of the Project. Prior to construction, the applicant will obtain all applicable permits. Please also refer to Project Design Feature **PDF-TR-1** Traffic Control Plan in Section 3.1.7.7 of the Draft EIR.
- O6-112** The commenter states that construction traffic has the potential to cause road damage and the Proposed Project should be required to fully and timely repair any damaged roads to the satisfaction of the community. In response, compliance with County haul route requirements would ensure construction-related damages to existing roads are adequately repaired.
- O6-113** The comment provides an example of 7 foot-high chain link fencing with barb wire that is not compatible with an energy project adjacent to Jacumba residents. In response, Figure 1-8 of the Final EIR shows the types of perimeter fencing that would be installed. Breakaway or flow through fencing will be required in areas subject to higher 100-year flood depths. Section 2.1, Aesthetics, and the Visual Resources Report (Appendix B to the EIR) analyze the visual impacts of the Project, including the proposed fencing. Mitigation measure **M-AE-5**, which require the installation of landscaping on along some segments of the fencing. Mitigation measure **M-AE-6**, which will require tan slats or screening be installed on the security fencing, as described in the mitigation measure.
- O6-114** The commenter states that the Proposed Project’s chain link fencing with slating may create additional major noise issue by clattering during high wind events. In response, the Section 2.9 Noise of the EIR did not identify noise impacts associated with the fencing. The potential for chain link fencing with proposed slating to create “a major

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- noise issue” is speculative. Proper maintenance of the project fencing and its slating should minimize the opportunity for loose slates to clatter and potentially generate noise under sufficiently high ground wind speed conditions.
- O6-115** The commenter states that debris will pile up next to fencing during wind events and must be kept clean. In response, the Proposed Project will be required to maintain the perimeter fencing and site through the life of the Project. This comment does not raise a specific issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.
- O6-116** The commenter states that promises to keep lights shielded and pointed downward are often forgotten and ignored, and that dark skies are an important resource to residents and visitors alike and must be protected. In response, Section 2.1 Aesthetics includes an analysis of the Proposed Project’s potential impacts associated with light and glare. Low level lighting would be installed at the access driveways, the substation and switchyard pad. As describe in the Draft EIR the Proposed Project would install motion sensor lighting; however, in response to comments from California Department of Fish and Wildlife, no motion sensor lighting will be used. (See Response to Comment A2-77.) Low level lighting would be installed which complies with the County’s Light Pollution Code.
- O6-117** The commenter states that lighting installed at gas stations along Interstate 8 represent a perfect example of what not to do and the County has failed to enforce lighting regulations, which creates a bad precedent. The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-118** The commenter states that 36.5 million gallons of water for construction and 3.25 million annually for operation is a lot of water that will no longer move through the environment to support local springs and wildlife habitat. In response, Section 2.7 Hydrology and Water Quality and the Groundwater Resources Investigation Report (Appendix J) of the Draft EIR analyze the Proposed Project’s impacts to groundwater resources and groundwater dependent ecosystems. A Groundwater Monitoring and Mitigation Plan (GMMP) has been prepared and would be implemented in accordance with Project Design Feature **PDF-HYD-2**. The GMMP (Appendix A of the Groundwater Investigation Report) details groundwater thresholds for off-site well interference and groundwater depending habitat. The EIR determined that impacts to groundwater dependent ecosystems would be less than significant.
- O6-119** The commenter states that renewable energy projects are justified to County decision-makers as job creation, but the job creation does not benefit the communities that bear

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- a disproportion of the impacts associated with the Proposed Project. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. However, please refer to Response to Comment O6-22 regarding employment.
- O6-120** The commenter references that the Proposed Project would be an “unmanned facility that would be monitored remotely” and thus not generate local jobs. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-121** The commenter asks that the Project provide a dedicated hotline for emergencies and complaints. In response, as discussed in Section 1.2.1.6, Project Design Features, of Chapter 1 of the Draft EIR includes Preparation of Construction Notification Plan (**PDF-TR-2**), which requires the Project applicant to provide notices to the public regarding construction activities. During construction, the Project applicant also will provide a public liaison and a toll-free information hotline to receive questions and complaints and respond to inquiries. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-122** The commenter states that there is no Power Purchase Agreement. In response, a Power Purchase Agreement (PPA) was presented to the San Diego Community Power (SDCP) Board of Directors on May 27, 2021. As a result, the Proposed Project, if approved, would provide renewable energy to customers in the cities of San Diego, Chula Vista, La Mesa, Imperial Beach and Encinitas through a 20-year term PPA with SDCP, a Community Choice Aggregation program partnered with San Diego Gas & Electric. The PPA requires an annual guaranteed energy production amount, which in turn requires the solar facility to be 90 MW AC and to produce approximately 260,000 megawatts per hour/year (MWh/yr) to reasonably achieve the guaranteed energy production amount. (San Diego Community Power, Staff Report to Board of Directors at 2 (May 27, 2021), available at <https://sdcommunitypower.org/wp-content/uploads/2020/12/00.-Agenda-Packet-v4.pdf>.) Both the revised Proposed Project and the Community Buffer Alternative would be able to meet the obligations of the PPA.
- O6-123** The commenter states that the lack of an end date for the Proposed Project “translates into a permanent and irreversible impact and potentially larger future impact if the project is increased in size or energy at a later date.” In response, as discussed in Chapter 1 of the Draft EIR, the Proposed Project would have a 35-year operational lifetime. To ensure that this end date is complied with, the Proposed Project would

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- comply with Section 6954(b)(3)(d) of the County Zoning Ordinance for removal surety, which requires the operator to provide security prior to building permit to be released upon removal of the energy system. If a new use is not proposed at the end of the Project’s life, such as the continued use of the Project site as a solar facility, the Project’s decommissioning would include removal of the Project and preparing the site with a compatible hydroseed mix.
- O6-124** The commenter states that recycling of solar panels is “problematic,” and PV modules should be classified as hazardous waste given that they contain hazardous materials. In response, as discussed in Section 2.6.3.3 of the Draft EIR, decommissioning of the solar facility would entail disassembly of the facility components. Generally, if the panels can no longer be used in a solar array, the aluminum can be resold, and the glass can be recycled. As discussed in Chapter 2.6, Hazards and Hazardous Materials, of the Draft EIR the Project would not generate hazardous waste as determined pursuant to the California Health and Safety Code, Chapter 6.5. Prior to recycling, any hazardous components of the PV panels would be removed and properly disposed of off-site.
- O6-125** The commenter refers to a Forbes article published in 2018 regarding hazardous waste caused by solar panels. The article states that solar panels often contain hazardous materials. Additionally, the article states that the panels and panel glass often cannot be recycled or disposed of due to hazardous materials located in the panels. In response, as discussed in Response to Comment O6-124, PV panels may contain some hazardous components. However, prior to recycling, any hazardous components of the PV panels would be removed and properly disposed of off-site.
- O6-126** The commenter states that California is in the process of determining how to divert solar panels from landfills. The comment does not raise concerns related to the adequacy of the Draft EIR; therefore, no further response is required.
- O6-127** The comment provides excerpts from an informational seminar regarding potential hazardous materials contained in PV solar panels. In response, as discussed in response to comment O6-124, PV panels may contain some hazardous components. However, prior to recycling, any hazardous components of the PV panels would be removed and properly disposed of off-site. The comment does not raise concerns related to the adequacy of the Draft EIR; therefore, no further response is required.
- O6-128** The commenter states that there will be “tons of materials that will need to be disposed as electronic waste.” In response, please refer to Section 1.2.1.3 Decommissioning in the EIR. The comment does not raise concerns related to the adequacy of the Draft EIR; therefore, no further response is required.

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- O6-129** The commenter asks the County to deny the General Plan amendment, rezone, and Policy I-111 waiver for projects adjacent to the border. In response, the applicant is no longer proposing a General Plan amendment or rezone. The Proposed Project requires a Major Use Permit based on the existing land use designation and zoning. With respect to whether to approve the Proposed Project, the County Board of Supervisors has the final decision-making authority to approve or deny the Proposed Project. The comment does not raise concerns related to the adequacy of the Draft EIR; therefore, no further response is required.
- O6-130** The commenter states that the Proposed Project will be a “major order of magnitude impact to visual and other important resources.” The comment does not raise concerns related to the adequacy of the Draft EIR; therefore, no further response is required. However, please refer to Chapters 2 and 3 of the Draft EIR for analysis of potentially significant impacts.
- O6-131** The comment provides a picture of a Sunrise Powerlink construction yard and description of the same. The comment does not raise concerns related to the adequacy of the Draft EIR; therefore, no further response is required.
- O6-132** The commenter states that a full EIR is necessary to analyze the Proposed Project and identifies areas of potential significant impacts. The comment does not raise specific concerns related to the adequacy of the Draft EIR; therefore, no further response is required. Please also see Response to Comment O6-52 with respect to other areas of analysis requested for the EIR.
- O6-133** The commenter requests that particulate matter from grading and GHG emissions from construction equipment be analyzed, including the potential to use less polluting equipment like natural gas. In response, please refer to Section 2.2 Air Quality of the EIR regarding potential impacts during construction. Please refer to Section 3.1.3 regarding Greenhouse Gas Emissions. The comment does not raise concerns related to the adequacy of the Draft EIR; therefore, no further response is required.
- O6-134** The commenter states that the gen-tie line and project components will generate off-gassing and electrical pollution. It is unclear what the commenter means by “off-gassing,” however, please see Sections 2.2, Air Quality, and 2.6, Hazards and Hazardous Substances, for a discussion of potentially significant effects from the Project and mitigation measures applied. With respect to electrical pollution, please see Response to Comment O6-84 and Global Response GR-4 Electromagnetic Field Impacts. The comment does not raise concerns related to the adequacy of the Draft EIR; therefore, no further response is required.

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- O6-135** The commenter states that proper handling, storage, and disposal procedures are critical to reduce emissions of sulfur hexafluoride (SF6), which is a potent GHG. In response, Section 3.1.3, Greenhouse Gas Emissions, of the Draft EIR, analyzes the potential for SF6 emissions from Project equipment. The comment does not raise concerns related to the adequacy of the Draft EIR; therefore, no further response is required.
- O6-136** The commenter cites to EPA’s Overview of SF6 Emissions Sources and Reduction Options in Electric Power Systems. The comment does not raise concerns related to the adequacy of the Draft EIR; therefore, no further response is required.
- O6-137** The commenter cites to portions of EPA’s Overview of SF6 Emissions Sources and Reduction Options in Electric Power Systems. The comment does not raise concerns related to the adequacy of the Draft EIR; therefore, no further response is required.
- O6-138** The commenter states that conversion equipment, inverters (DC to AC), transformers, switchgears, PV module tracking motors, HVAC units and battery energy storage systems, and power lines, all make noise; complicated noise. In response, Section 2.9, Noise, of the Draft EIR evaluates the Proposed Project’s potential noise impacts during operation. Please also refer to the Acoustical Assessment Report for the JVR Energy Park Project (Appendix M to the EIR). Based on the County’s Guidelines for Determining Significance – Noise (County of San Diego 2009a) and CEQA Guidelines Appendix G, the Draft EIR concludes that the Proposed Project, with implementation of mitigation measures (**M-NOI-1** and **M-NOI-2**), would have less than significant noise impacts.
- O6-139** The commenter references a news article regarding solar panel noise nuisance in Martha’s Vineyard, Massachusetts, from 2014. The comment does not raise a specific issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.
- O6-140** The commenter provides excerpts from the news article referenced in comment O6-139. The comment does not raise a specific issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.
- O6-141** The commenter references an undated whitepaper entitled, Harmonics and Noise in Photovoltaics: PV Inverter and the Mitigation Strategies, from Solectria Renewables. The comment does not raise a specific issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.
- O6-142** The commenter references an article by SMA Solar Technologies regarding inverter noise emissions. The comment does not raise a specific issue regarding the adequacy

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- of the analysis contained in the Draft EIR; therefore, no further response is required. However, please refer to Section 2.9 Noise of the EIR regarding the Proposed Project's noise impacts from stationary equipment, including the inverter/transformer platforms.
- O6-143** The commenter states that Proposed Project components will be subject to wind generated noise, including noise from rattling solar panels and slatted chain link fencing. In response, Section 2.9 Noise of the EIR adequately analyzes the Proposed Project's noise impacts. Please also refer to Responses to Comments O6-114 and O6-138.
- O6-144** The commenter states that the NOP fails to address the loss of future housing potential on the almost 700 acres being converted to industrial solar. In response, the Proposed Project does not propose a General Plan Amendment or rezone. The existing General Plan land use designation and zoning will remain. Because the Project site is currently not developed with housing and there are no foreseeable proposals to develop housing, the comment does not provide evidence that the approval of the Proposed Project would result in the loss of housing planned for the area. Finally, because the Proposed Project will be an interim use, it will not foreclose the potential for housing development on the site in the future. The comment does not raise a specific issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.
- O6-145** The commenter states that the NOP fails to address the potential abandonment of homes and loss of population due to project related impacts. In response, please refer to Global Response GR-1 Socioeconomics and Environmental Justice, which discusses the relationship between socio-economic considerations and CEQA. The comment does not raise a specific issue regarding the adequacy of the analysis contained in the Draft EIR; therefore, no further response is required.
- O6-146** The commenter states that when solar energy is not needed and the sun is shining, energy is dumped into the ground and can migrate to homes. In response, please refer to Response to Comment O6-84. Further, the Proposed Project would be developed with up to 90 MW of energy storage, which would enable Project operators to defer electricity generated by the Project to storage if grid operators do not have a need for the power. The comment does not raise concerns related to the adequacy of the Draft EIR; therefore, no further response is required.
- O6-147** The commenter states that plot plans show a water supply line extension through the Project. In response, the Proposed Project has been revised to include realignment of the existing water main. Please refer to Chapter 1 of the Final EIR for a description of

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- the Proposed Project’s realignment of the water line (see enlarged Figure 1-3 series in the Final EIR).
- O6-148** The commenter states that excessive use of local groundwater resources also can impact supplies into the Boulevard Planning Area where the vast majority of the Boundary Creek watershed and fresh water is located up gradient of Jacumba. In response, please refer to Response to Comment O7-110. The Proposed Project is not anticipated to result in a significant impact to groundwater resources in the Jacumba Valley Groundwater Basin or the Boulevard Planning Area.
- O6-149** The commenter states that wells and springs on the west side of Jacumba, up through Bankhead Springs should be monitored prior to, during and after the Project is build and operating. In response, Section 2.7 Hydrology and Water Quality of the EIR analyzes the Proposed Project’s groundwater impacts. A Groundwater Monitoring and Mitigation Plan has been prepared and will be implemented in accordance with Project Design Feature **PDF-HYD-2**. The GMMP is included as Appendix A of the Groundwater Investigation Report (Appendix J of the Draft EIR). Groundwater-level monitoring would be performed in several wells to record groundwater levels during groundwater extraction. The GMMP also details groundwater thresholds for off-site well interference.
- O6-150** The commenter states that during the last major construction project using JCSD wells resulted in residents west of Jacumba reporting significantly increased depth to water in their wells. In response, please refer to Response to Comment O6-149. The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-151** The commenter states that the amount of energy associated with the Project’s electronic components must be disclosed. In response, please refer to Section 3.1.2 Energy of the EIR. The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-152** The commenter states that the Proposed Project has the potential to ignite wildfires through attraction of lightning strikes and/or electrical faults or other malfunctions that may result in potentially hazardous fumes and waste. In response, Section 2.7 Hazards and Hazardous Materials and Section 2.12 Wildfire of the EIR analyze the Proposed Project’s potential hazardous materials and wildfire impacts. As discussed in Section 2.6.3.3, the Proposed Project would result in less than significant impacts for hazardous materials. The EIR also determined that wildfire impacts would be less than significant with implementation of mitigation measures **M-WF-1** (Fire Protection Plan), **M-WF-**

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- 2 (Construction Fire Protection Plan), and **M-WF-3** (Fire Protection and Mitigation Agreement).
- O6-153** The commenter states that battery storage represents additional sources of wildfire ignition and hazardous/toxic fumes generated by burning lithium ion batteries and thermal events. Please see Response to Comment O6-152. The comments do not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-154** The commenter references the 2018 International Fire Code and International Residential Code Hazard Mitigation approach to address unknowns with new technologies. The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-155** The commenter states that specialty firefighting equipment and specially trained fire fighters are needed in permanently in Jacumba Hot Springs, and should be funded by the Project. In response, Section 2.12, Wildfire, of the Draft EIR analyzes potential wildfire impacts. Mitigation measure **M-WF-1** requires the preparation and implementation of a Fire Protection Plan (FPP) for the Proposed Project. The Fire Protection Plan is included as Appendix N of the EIR. Section 5.1.3 of Appendix N calls for fire personnel training. The Proposed Project will also provide six 10,000-gallon water tanks accessible to fire fighters to generate firefighting foam. (See Appendix N, Section 5.3.)
- O6-156** The commenter asks what good are the 10,000-gallon tanks when water cannot be used to fight electrical fires? In response, please refer to Response to Comment O6-155. In addition, Section 2.6.3.3, Hazardous Materials, and Section 2.6.3.7, Wildland Fire Hazards, of the Draft EIR describe the fire and hazard protective measures associated with the energy storage component of the Project. Section 2.6.3.3 states that the energy storage systems will comply with the National Fire Protection Association’s new 2020 Standards for the Installation of Energy Storage Systems (NFPA 855) and all applicable standards when building permits are issued.
- O6-157** The commenter states that mandatory findings of significance should be addressed in the Draft EIR. In response, please refer to Chapter 6, Other CEQA Considerations, for a discussion of significant environmental impacts from the Project that cannot be mitigated to less than significant. The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.

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- O6-158** The commenter refers to preliminary Proposed Project design in plot plans dated November 1, 2018, which were posted for public review. In response, please refer to Chapter 1 of the Final EIR for a discussion of the revised Project design. Please also refer to the enlarged Figure 1-3 series. In addition, updated plot plans are available on the County’ website for the Proposed Project. The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-159** The commenter refers to an article from Insurance Journal in 2019 entitled, “Why Insurance Claims in Renewable Energy Industry Are Rising.” The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-160** This commenter states that the Project must include “community-based” mitigation. In response, Chapter 5, Mitigation Measures, describes the mitigation measures set forth in the Draft EIR. The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-161** The commenter states that if “the project is phased in, then the components furthest from Jacumba’s residential areas should be installed first.” In response, a description of the Project’s construction is provided in Section 1.2.1.2 of Chapter 1, Project Description. The Project does not anticipate phased construction. The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-162** The commenter states that the Proposed Project footprint should be reduced and moved away from Jacumba Hot Springs, the airport, and Old Highway 80. The comment also proposes that Jacumba Hot Springs residents should receive free energy for the life of the Project. In response, please refer to Chapter 4, Alternatives, which discusses two alternatives to the Project—the Community Buffer Alternative and the Reduced Project Alternative—which include increased setbacks as compared to the Proposed Project. Please also see Global Response GR-6 Alternatives, which discusses additional alternatives proposed by commenters. Further, please note that the Proposed Project has been revised to include increased setbacks from Jacumba Community Park and Old Highway 80. Please refer to Chapter 1 of the Final EIR.
- O6-163** The commenter states that Property Value Protection Agreements and reimbursement for higher insurance rates should be provided by the Project. The comment also states that permanent open space should be provided. In response, with respect to Property Value Protection Agreements, please see Global Response GR-1 Socioeconomics and Environmental Justice, which discusses the relationship between CEQA and socio-

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- economic considerations. With respect to permanent open space, please refer to Section 2.3 Biological Resources of the EIR. The proposed on-site biological open space easement is shown in Figure 2.3-8. Further, the Proposed Project has been revised in the Final EIR to include increased setbacks along Old Highway 80 and adjacent to Jacumba Community Parks (please see Chapter 1 of the Final EIR). The comments do not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-164** The commenter states that a trail system should be designed and built at the Project’s expense that would make it easier to access Anza Desert State Park and Anza Borrego Foundation-managed areas. In response, the Proposed Project is a solar generation and energy storage facility and is not required to provide trails. The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-165** The commenter states that no amount of mitigation will off-set what will be permanently and irretrievably lost as a result of the Project being approved. In response, due to the fact that the EIR identifies significant environmental impacts that cannot be mitigated below a level of significance, if the County Board of Supervisors decides to approve the Proposed Project, the Board must approve a Statement of Overriding Considerations that further describe in detail what facets of the Project override the environmental impacts described in the Final EIR. (CEQA Guidelines § 15093.) The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-166** The commenter states that there is no “valid reason” to approve the Proposed Project “beyond perceived corporate greed and government short-sightedness.” The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-167** The comment states that there are alternative locations for the Project within the City of San Diego and the County that do not “require conversion of green field sites.” In response, please refer to Chapter 4, Project Alternatives, of the Draft EIR, which considered but rejected alternative locations for the Proposed Project. Please also refer to Global Response GR-6 Alternatives. The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O6-168** This commenter states that the Project places an undue burden on the predominately low-income residents of Jacumba Hot Springs. In response, please refer to Global Response GR-1 Socioeconomics and Environmental Justice, which discusses the

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relationship between socio-economic considerations and CEQA. The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no response is required.

O6-169 The comment thanks the County for considering its comments on the NOP. The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.

O6-170 The comment attaches an article, “Desert Rose and the Story of Stray Currents,” published in 2014 by Daniel Ross. The comment does not raise issues regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required. Please refer to Responses to Comments O6-6 and O6-84 through O6-89 for a discussion of the contents of the article.

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