

CHAPTER 8.0 RESPONSE TO COMMENTS AND REVISIONS TO THE DRAFT EIR

A Draft Environmental Impact Report (Draft EIR) for the proposed Starlight Solar Project (project) was prepared and made available for public review from July 31 to September 15, 2025. During this review period, the County received comment letters from Tribes, agencies, non-agency organizations, and individuals (members of the public). The County has prepared responses to each written comment letter, as provided in Section 8.2. A list of all commenters on the Draft EIR is provided in Table 8.1-1, below. Both the comment letters and the County’s responses are included in this chapter of the Final EIR. Additionally, Global Responses have been developed to address recurring topics raised in the comments. In some instances, comments led to revisions in the Draft EIR; these changes are indicated with strikeout and underline formatting in the Final EIR and are summarized in Table 8.1-2 below.

The County’s responses to comments on the Draft EIR reflect a good-faith, well-reasoned effort to address the environmental concerns identified. In accordance with State CEQA Guidelines, the County is required to respond only to comments that raise environmental issues regarding the adequacy of the Draft EIR—not to all comments received. Pursuant to State CEQA Guidelines Sections 15088 and 15204, the County has independently reviewed the comments and prepared written responses describing how significant environmental issues were addressed. CEQA does not obligate the County to conduct every test or undertake all research or studies suggested by commenters, but rather to provide a good-faith, reasoned analysis based on factual information.

To meet these requirements, the County’s planning and environmental science experts consulted with and independently reviewed analyses prepared by subject matter experts. These experts possess extensive education and field experience in areas such as aesthetics, air quality, biological resources, cultural resources, tribal cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, public services, transportation and traffic, utilities and service systems, energy, and wildfire. They are familiar with both the project and the environmental conditions within the County, as well as the relevant federal, state, and local regulations (including CEQA) that apply to the proposed project. Consequently, the analyses provided by County staff in response to comments are supported by substantial evidence. Similarly, the County Counsel’s Office independently reviewed legal analyses that supplement the responses to comments on the Draft EIR.

8.1 Introduction to the Final EIR

8.1.1 Overview of the Environmental Review Process

In compliance with the State CEQA Guidelines, the County, as the Lead Agency for the project, has provided opportunities for the public to participate in the environmental review process. As described below, throughout the environmental review process, an effort was made to inform, contact, and solicit input from the public and various Federal, State, regional, and local government agencies and other interested parties on the project.

8.1.1.1 *Scoping and Notice of Preparation Process*

Pursuant to Section 15082 of the State CEQA Guidelines, the Lead Agency is required to send a Notice of Preparation (NOP) stating that an EIR would be prepared to the State Office of Land Use and Climate and Research (now known as the State Office of Land Use and Climate Innovation), responsible and trustee agencies, and federal agencies involved in funding or approving the project. On March 23, 2023, in

accordance with Sections 15063 and 15082 of the State CEQA Guidelines, the County published an NOP for the EIR and circulated it to governmental agencies, organizations, and persons who may be interested in the proposed project, including nearby landowners and residents. The NOP requested comments on the scope of the EIR and asked interested parties for their suggestions regarding ways the project could be revised to reduce or avoid any significant environmental impacts. The NOP provided a general description of the proposed project, a description of the project site, and a preliminary list of potential environmental effects. The 30-day NOP comment period extended through April 24, 2023.

Consistent with Section 21083.9 of the State CEQA Guidelines, a public scoping meeting was held to solicit comments on the NOP. This meeting was held on Wednesday, April 12, 2023, at 6:00 p.m. at 39919 Ribbonwood Road in Boulevard, CA. A summary matrix of written comments received during the NOP comment period, as well as verbal comments recorded at the two public scoping meetings, is provided as an appendix to the Final EIR (Appendix A to the Draft EIR).

8.1.1.2 Draft Environmental Impact Report

The Notice of Availability (NOA) of the Draft EIR was distributed to responsible and trustee agencies, other affected agencies, interested parties, and all parties requesting a copy of the Draft EIR in accordance with Public Resources Code (PRC) Section 21092(b)(3). The Notice of Completion and NOA of the Draft EIR were distributed and posted as required by CEQA. The public review period was from July 31, 2025 to September 15, 2025. During the review period, the Draft EIR and its appendices were available for review on the County's website: <https://www.sandiegocounty.gov/content/sdc/pds/ceqa/PDS2022-MUP-22-010.html>.

During the Draft EIR public review period, the County received 35 comment letters on the Draft EIR from agencies, organizations, and individuals through letters, emails, and comment cards. A public meeting was held to present project information, provide information on the Draft EIR's analysis and findings regarding the project, and provide instructions on how to submit written comments on the Draft EIR. This meeting was held on August 7, 2025 at 7:00 p.m. at the Backcountry Resource Center located at 39919 Ribbonwood Road in Boulevard, CA. All written comments received during the public review period and responses to comments are provided in Section 8.2, Comment Letters and Responses, of the Final EIR.

8.1.1.3 Final Environmental Impact Report

Following the close of the Draft EIR public review and comment period, the County has prepared responses to comments received on the Draft EIR, provided in Section 8.2. The comments do not provide any indication that the Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded, as defined in State CEQA Guidelines Section 15088.5. Consistent with State CEQA Guidelines Section 21092.5, responses to agency comments will be provided to each commenting agency at least 10 days prior to the Board of Supervisors' consideration of the EIR. The Final EIR will also be publicly available online at least 10 days prior to the Board of Supervisors' consideration of the EIR at: <https://www.sandiegocounty.gov/content/sdc/pds/ceqa/PDS2022-MUP-22-010.html>.

Through the preparation of the Final EIR, the County has made minor revisions to the text of the Draft EIR, which are provided in the preceding chapters of the Final EIR. No significant changes have been made to the information contained in the Draft EIR that would result in a new or substantially increased environmental impact because of the responses to comments, and no significant new information has been added that would require recirculation of the document under State CEQA Guidelines Section 15088.5. These revisions are summarized in Table 8-2, below.

8.1.2 List of Commenters on the Draft EIR

During the Draft EIR public review period, the County received two Tribal comment letters (T1, T2, and T3), six Agency comment letters (A1 through A6, including one submitted after the deadline), one Organization comment letter (O1), and 18 Individual comment letters (I1 through I18, including three submitted late). Each comment letter has been assigned an alphanumeric label, and individual comments within each letter are bracketed and numbered. For example, Individual Comment Letter I9 contains eight specific comments, labeled I9-1 through I9-8. Please refer to Table 8-1 below for a complete listing of all written comment letters received during the public comment period.

Table 8.1-1. Comments Received on the Draft Environmental Impact Report

Comment Letter Designation	Commenter
<i>Tribes</i>	
T1	Campo Band of Diegueño Mission Indians Letter dated: July 31, 2025
T2	Manzanita Band of the Kumeyaay Nation Letter dated: September 15, 2025
<i>Agencies</i>	
A1	California Department of Transportation (Caltrans) District 11 Letter dated: July 31, 2025
A2	Jacumba Community Service District (JCSD) Letter dated: August 7, 2025
A3	Naval Base Coronado Letter dated: August 11, 2025
A4	Caltrans District 11 Letter dated: September 8, 2025
A5	Caltrans District 11 Letter dated: September 15, 2025
A6	California Department of Fish and Wildlife (CDFW), South Coast Region Letter dated: September 26, 2025 [Late]
<i>Organizations</i>	
O1	Jacumba Community Sponsor Group Letter dated: August 14, 2025
<i>Individuals</i>	
I1	Nandor Nevai Letter received: August 1, 2025
I2	Carl Anderson III Letter received: August 8, 2025
I3	Jacquelyn Valadez Letter received: August 15, 2025
I4	Thomas Wall Letter received: August 15, 2025
I5	Earl Goodnight Letter received: August 21, 2025

Comment Letter Designation	Commenter
16	Julita Rummier Letter received: September 4, 2025
17	Mikayla Brennan Letter received: September 6, 2025
18	Dan Grunow Letter received: September 6, 2025
19	Ken Kramer Letter received: September 12, 2025
110	Miles Maeda Letter received: September 14, 2025
111	Weena Joshi Letter received: September 15, 2025
112	Matt Spencer Letter received: September 15, 2025
113	Chantaia Soleil Letter received: September 15, 2025
114	David Berggren Letter received: September 15, 2025
115	Rebecca Berggren Letter received: September 15, 2025
116	Mara Harris Letter received: September 15, 2025
117	Dustin Valentine Letter received: September 15, 2025
118	Melanie Zardeneta Letter received: September 15, 2025

8.1.3 Global Responses

Many comment letters submitted on the Draft EIR raised similar topics. To address these recurring topics, the County prepared a series of “Global Responses” which are included in Section 8.2.1 of the Final EIR. These Global Responses cover commonly repeated concerns and consist of the following:

- Global Response GR-1 – Visual Impacts
- Global Response GR-2 – Cumulative Impacts
- Global Response GR-3 – Groundwater Impacts
- Global Response GR-4 – Heat Island Effect
- Global Response GR-5 – Wildfire Risks
- Global Response GR-6 – Fire Insurance, Socioeconomic Impacts, and Environmental Justice
- Global Response GR-7 – Non-Substantive Comments

CEQA does not require a separate response for every repeated comment if the response would simply duplicate information already provided. Several comment letters reiterate issues that have already been addressed in Global Responses or other written responses included in the Final EIR. Because of this potential repetition, the County relies on these existing responses to address similar or identical issues, even when an individual response does not cross-reference other relevant responses. This approach is justified by the volume of comments received and the frequent overlap in topics. Therefore, reviewers are encouraged to consult the Global Responses as well as other written responses for additional information.

8.1.4 Summary of Changes to the Draft EIR and Appendices

The Table 8-2 below presents revisions, clarifications, and corrections that have been made since publication of the Draft EIR. No significant changes have been made that would result in a new or substantially increased environmental impact, and no significant new information has been added that would require recirculation of the document under State CEQA Guidelines Section 15088.5. According to State CEQA Guidelines Section 15088.5:

Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The changes highlighted in this section merely clarify, amplify, or make minor modifications to the information provided in the Draft EIR. According to State CEQA Guidelines Section 15088.5, the four conditions which require an EIR to be recirculated are as follows:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
- (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The information and revisions included in the Final EIR do not constitute “significant” new information, because no additional substantial environmental effect of the project has been identified, nor has the severity of an environmental impact been increased. There has been no disclosure of any feasible alternatives or mitigation measures that would clearly lessen the impacts of the project that the County has declined to adopt. Lastly, there has been no evidence provided that demonstrates the Draft EIR was inadequate or conclusory in nature. Therefore, none of the conditions for recirculation of the EIR, as specified above in State CEQA Guidelines Section 15088.5, have been met.

The information provided in this chapter is intended only to provide a summary of the modifications to the Draft EIR, which are listed below under the respective chapter, section, and page number. The actual location of each revision within the Final EIR should be reviewed for complete context and representation of the revisions to the Draft EIR. Deletions to the Draft EIR are shown with ~~striketrough~~ text, and additions to the Draft EIR are shown with underline text.

Table 8.1-2. Revisions to the Draft EIR

Page Number and Section/Table	Revision	Reason for Revision
Chapter S, Executive Summary		
Page S-1, Chapter S	Introductory text has been included to explain the public review period for the Draft EIR, summarize the comment letters received during this time, and outline how the Final EIR addresses both responses to comments and resulting changes to the Draft EIR.	Clarification regarding the organization and content of the Final EIR.
Page S-2, Section S.1.4	The following text from Section S.1.4, Environmental Setting, has been revised to state that the "entire project site is <u>largely currently undeveloped.</u> "	Revised for clarity and consistency with Section 1.3.1 Existing Setting, of Chapter 1, Project Description.
Page S-3, Section S.2	Reference to Aesthetics (Section 2.1) has been removed from the list of environmental resource areas in the EIR which identify mitigation measures.	Revised for consistency with Section 2.1 Aesthetics, which states that no feasible mitigation measures were identified for the proposed project.
Page S-10, Table S-1	Mitigation Measure M-BI-3 Habitat Preservation has been revised to reference the County's Biological Mitigation Ordinance (BMO) rather than the East County Multiple Species Conservation Program (ECMSCP).	A draft map of the ECMSCP area, which the project is within, was released in 2008, however the actual ECMSCP has not yet been prepared by the County. As such, M-BI-3 would be implemented pursuant to the BMO, in addition to other County plans, rather than the ECMSP.
Page S-13, Table S-1	Mitigation Measure M-BI-3 Habitat Preservation has been revised to remove an erroneous duplication of the following phrase: "Granting of this open space authorizes the County and its agents to periodically access the land to perform management and monitoring activities for the purposes of species and habitat conservation."	Revised to omit a repetitive statement.
Page S-13, Table S-1	The timing of Mitigation Measure M-BI-3 Habitat Preservation has been revised as follows: " <u>In each phase, prior to approval of any grading and/or improvement plans and issuance of any grading or construction permits</u> Prior to approval of any plan or issuance of any permit in each phase, and prior to use of the premises in reliance of this permit the easements shall be recorded."	Revised for clarity.
Page S-14, Table S-1	The timing of Mitigation Measure M-BI-4 Resource Management Plan has been revised as follows: " <u>In each phase, prior to approval of any grading and/or improvement plans and issuance of any grading or construction permits</u> Prior to approval of any plan or issuance of any permit in each phase, and prior to use of the premises in reliance of this permit the RMP shall be approved."	Revised for clarity.

Page Number and Section/Table	Revision	Reason for Revision
Page S-16, Table S-1	Mitigation Measure M-BI-8 Prevention of Invasive Plant Species has been revised as follows: "The PDS landscape architect shall require that all final landscape plans <u>hydroseeding mix</u> comply with the following: no invasive plant species, as included on the most recent version of the California Invasive Plant Council's California Invasive Plant Inventory for the project region shall be included, and the plant palette shall be composed of native species that do not require high irrigation rates."	Revised to address an erroneous reference to a final landscape plan. The project does not include a formal landscaping plan, however hydroseeding will be applied during construction, which would be required to comply with the measures listed in M-BI-8.
Page S-18, Table S-1	Mitigation Measure M-BI-5 Avian Breeding and Special-status Wildlife Impact Avoidance has been revised to spell out the acronym for the Migratory Bird Treaty Act (MBTA).	Revised for clarity.
Page S-18, Table S-1	Section (1)(a)(iii) of Mitigation Measure M-BI-5 has been revised as follows: "A monitoring and reporting plan detailing the information to be collected for incorporation into a regular Nest Monitoring Log (NML) with sufficient details to enable USFWS and CDFW to monitor the Applicant's compliance with <u>the MBTA</u> and Fish and Game Code Sections 3503, 3503.5, 3511, and 3513, <u>respectively</u> ."	Revised for clarity.
Page S-19, Table S-1	Section (1)(d) of Mitigation Measure M-BI-5 has been revised as follows: "Each nest identified in the project site shall be included in the NML. The NMLs should be updated daily and submitted to the CDFW <u>and USFWS</u> weekly."	Revised for clarity.
Page S-27, Table S-1	Impact statements have been added for the project's less-than-significant cumulative impacts related to biological resources.	Section 2.2, Biological Resources, of the Draft EIR concluded that the project's cumulative impacts related to biological resources would be less-than-significant after mitigation. However, these conclusions had been omitted from Table S-1 in the Draft EIR.
Page S-33, Table S-1	Impact statements have been added for the project's less-than-significant cumulative impacts related to cultural resources.	Section 2.3, Cultural Resources, of the Draft EIR concluded that the project's cumulative impacts related to cultural resources would be less-than-significant after mitigation. However, these conclusions had been omitted from Table S-1 in the Draft EIR.
Page S-34, Table S-1	Mitigation Measure M-N-2 has been revised to remove the specific setback distances for heavy duty construction equipment in part 2 of the measure.	Upon further review, implementation of the setbacks required in part 2 of M-N-2 would be infeasible. However, all other requirements of M-N-2 would be implemented, and the project would continue to comply with the County's 8-hour 75 dBA Leq standard at the project property lines adjoining existing occupied properties, which is the intent of the measure. Impacts would remain less than significant with mitigation, as concluded in Section 2.5, Noise, of the Draft EIR.
Page S-37, Table S-1	An impact statement has been added for the project's less-than-significant cumulative impact related to tribal cultural resources.	Section 2.6, Tribal Cultural Resources of the Draft EIR concluded that the project's cumulative impact related to tribal cultural resources would be less-than-significant after mitigation. However, this conclusion had been omitted from Table S-1 in the Draft EIR.

Page Number and Section/Table	Revision	Reason for Revision
Page S-37, Table S-1	Section 3 of Mitigation Measure M-WF-2 Fuel Modification Zones has been revised as follows: "A 30-foot FMZ around the perimeter between from the fence line and (including the internal perimeter road) shall reduce vegetation to less than 6 inches and be regularly maintained."	Revised for clarity.
Page S-38, Table S-1	Section 8 of Mitigation Measure M-WF-2 Fuel Modification Zones has been revised as follows: " <u>If deemed necessary by County Fire, Vegetation</u> vegetation within the 44 internal open space easements shall be maintained to a vertical height of no more than 6 inches <u>selectively cleared by hand to the extent required by written order for the express purpose of reducing an identified fire hazard.</u> "	Revised for clarity.
Chapter 1, Project Description		
Page 1-3, Section 1.2.1	The full title of the Rural Lands (RL-80) land use designation has been added and the land use designation of the gen-tie route has been specified.	Revised for clarity.
Page 1-5, Section 1.4.1	The title of Section 1.4.1 has been revised to read "Project Components."	Revised for clarity.
Page 1-10, Section 1.4.1.6	A reference to Appendix O.7, Battery Energy Storage System Plume Study (Hazard Dynamics 2026) has been added.	As discussed below, Appendix O.7 has been added to the Final EIR. Appendix O.7 provides supplemental information regarding the project's fire hazard analysis, including a plume study for the proposed Battery Energy Storage Facility (BESS), based on input from the San Diego County Fire Protection District.
Page 1-12, Section 1.4.2	Sentence has been revised to read "this open space <u>easement</u> would authorize the County and its agents to periodically access the land to perform management and monitoring activities."	Revised for clarity.
Page 1-18, Section 1.5	Information was added regarding the 45-day public review period of the Draft EIR.	Revised to provide additional details summarizing the public review process for the Draft EIR.
Page 1-21, Table 1-4	Table 1-4 has been revised to include two additional projects; Desert Jewel Storage and Boulevard Solar. Additionally, the acronyms included in the footnotes for Table 1-4 have been revised.	Cumulative project list has been expanded based on public comment. Acronym list revised for clarity.
Page 1-34, Figure 1-13	Figure 1-13 has been revised to include the two new cumulative projects added to Table 1-4 (Desert Jewel Storage and Boulevard Solar).	Cumulative project list has been expanded based on public comments.
Chapter 2.1, Aesthetics		
Page 2.1-36, Section 2.1.6.1	Additional information has been provided to substantiate the infeasibility of potential mitigation measures for aesthetic impacts, such as the use of landforms, vegetation, and structures as visual screens, or siting the project in a different area.	Revised to provide additional evidence supporting the finding that no feasible mitigation measures were identified for the proposed project.

Page Number and Section/Table	Revision	Reason for Revision
Page 2.1-37, Section 2.1.6.2	PDF-AE-1 has been revised to clarify that the phrase “existing residents” refers to nearby residents existing at the time of the Major Use Permit Decision for the proposed project.	Revised to provide additional details regarding the implementation of the project design feature.
Chapter 2.2, Biological Resources		
Pages 2.2-34, 2.2-36, 2.2-54, and 2.2-55, Section 2.2.3	Several typographical errors in the numbering of impacts have been corrected.	<p>Several impact statements within Section 2.2.3, Analysis of Project Effects and Determination as to Significance, and Section 2.2.5, Significance of Impacts Prior to Mitigation, were incorrectly numbered and were inconsistent with the biological resource report (Appendix D to the Draft EIR). The correct numbering for each impact were presented in the following locations in the Draft EIR, as well as:</p> <ul style="list-style-type: none"> • Chapter 2.2, Biological Resources: Table 2.2-6, Summary of Significant Impacts Prior to Mitigation, • Chapter 2.2, Biological Resources: Table 2.2-7, Summary of Significant Impacts, • Chapter 2.2, Biological Resources: Section 2.2.7, Conclusion • Chapter S, Executive Summary: Table S-1 • Biological Resources Report for the Starlight Solar Project (SWCA 2025; Appendix D to the EIR)
Page 2.2-34, Section 2.2.3	The following text has been revised as follows: “ Nine Eight County Group 1 and/or SSC animal species were detected within the survey area: Cooper’s hawk, sharp-shinned hawk, Bell’s sage sparrow, turkey vulture, Southern California legless lizard, coast horned lizard, San Diego black-tailed jackrabbit, and San Diego desert woodrat, and western spadefoot . An additional 17 46 County Group 1 and/or SSC animal species have high potential to occur on-site: southern California rufous-crowned sparrow, golden eagle, long-eared owl, red-shouldered hawk, northern harrier, white-tailed kite, prairie falcon, loggerhead shrike, Lewis’ woodpecker, California glossy snake, red-diamond rattlesnake, pallid bat, Dulzura pocket mouse, northwestern San Diego pocket mouse and , pallid San Diego pocket mouse, greater western mastiff bat, and southern grasshopper mouse.”	Revised for clarity and consistency with the biological resources report (Appendix D to the Draft EIR) and to address typographical errors.
Page 2.2-35, Section 2.2.3.2	The following text has been revised as follows: “ Four Six County Group 2 species that are not SSC were detected within the survey area: western spadefoot , California horned lark, western bluebird, mule deer, and mountain lion. An additional eight County Group 2 species that are not SSC have high potential to occur on-site: mountain quail, rosy boa, San Diego ringneck snake, ringtail, western red bat, small-footed myotis, long-eared myotis, and monarch butterfly.”	Revised for clarity and consistency with the biological resources report (Appendix D to the Draft EIR) and to address typographical errors.

Page Number and Section/Table	Revision	Reason for Revision
Page 2.2-35, Section 2.2.3.2	Impact BI-W-5 has been revised to read "Impacts related to the loss of suitable habitat would affect the local long-term survival of County Group 2 species and would be a potentially significant."	Revised to address a typographical error.
Page 2.2-49, Section 2.2.4	Updated total acreage of cumulative projects based on the two additional projects added to Table 1-4 (Desert Jewel Storage and Boulevard Solar).	Cumulative project list has been expanded based on public comment letters.
Page 2.2-49, Section 2.2.4.1, and Page 2.2-84, Section 2.2.7.1	The conclusion of the cumulative impact analysis related to candidate, sensitive, or special-status species has been moved from Section 2.2.4.1 to Section 2.2.7.1.	The Draft EIR incorrectly included both the cumulative impact analysis and cumulative impact conclusion in Section 2.2.4 and did not carry the impact statements through to Section 2.2.7. The impact conclusion has been moved to Section 2.2.7 to maintain consistency with the organization of the EIR.
Page 2.2-50, Section 2.2.4.2, and Page 2.2-85, Section 2.2.7.2	The conclusion of the cumulative impact analysis related to riparian habitat or sensitive natural community has been moved from Section 2.2.4.2 to Section 2.2.7.2.	See above. Revised for consistency.
Page 2.2-51, Section 2.2.4.3, and Page 2.2-85, Section 2.2.7.3	The conclusion of the cumulative impact analysis related to jurisdictional wetlands and waterways has been moved from Section 2.2.4.3 to Section 2.2.7.3.	See above. Revised for consistency.
Page 2.2-51, Section 2.2.4.4, and Page 2.2-86, Section 2.2.7.4	The conclusion of the cumulative impact analysis related to wildlife movement and nursery sites has been moved from Section 2.2.4.4 to Section 2.2.7.4.	See above. Revised for consistency.
Page 2.2-52, Section 2.2.4.5, and Page 2.2-87, Section 2.2.7.5	The conclusion of the cumulative impact analysis related to local policies, ordinances, and adopted plans has been moved from Section 2.2.4.5 to Section 2.2.7.5.	See above. Revised for consistency.
Page 2.2-61, Section 2.2.6.1	Mitigation Measure M-BI-3 Habitat Preservation has been revised to reference the County's BMO rather than the ECMSC.	A draft map of the ECMSCP area, which the project is located within, was released in 2008; however the actual ECMSCP has not yet been prepared by the County. As such, M-BI-3 would be implemented pursuant to the BMO, in addition to other County plans, rather than the ECMSCP.
Page 2.2-64, Section 2.2.6.1	Mitigation Measure M-BI-3 Habitat Preservation has been revised to remove an erroneous duplication of the following phrase: "Granting of this open space authorizes the County and its agents to periodically access the land to perform management and monitoring activities for the purposes of species and habitat conservation"	Revised to omit a repetitive statement.
Page 2.2-64, Section 2.2.6.1	The timing of Mitigation Measure M-BI-3 Habitat Preservation has been revised as follows: " <u>In each phase, prior to approval of any grading and/or improvement plans and issuance of any grading or construction permits</u> Prior to approval of any plan or issuance of any permit in each phase, and prior to use of the premises in reliance of this permit the easements shall be recorded."	Revised for clarity.

Page Number and Section/Table	Revision	Reason for Revision
Page 2.2-65, Section 2.2.6.1	The timing of Mitigation Measure M-BI-4 Resource Management Plan has been revised as follows: <u>“In each phase, prior to approval of any grading and/or improvement plans and issuance of any grading or construction permits. Prior to approval of any plan or issuance of any permit in each phase, and prior to use of the premises in reliance of this permit the RMP shall be approved.”</u>	Revised for clarity.
Page 2.2-66, Section 2.2.6.1	Mitigation Measure M-BI-5 Avian Breeding and Special-status Wildlife Impact Avoidance has been revised to spell out the acronym for the MBTA.	Revised for clarity.
Page 2.2-66, Section 2.2.6.1	Section (1)(a)(iii) of Mitigation Measure M-BI-5 has been revised as follows: “A monitoring and reporting plan detailing the information to be collected for incorporation into a regular Nest Monitoring Log (NML) with sufficient details to enable USFWS and CDFW to monitor the Applicant’s compliance with <u>the MBTA</u> and Fish and Game Code Sections 3503, 3503.5, 3511, and 3513, <u>respectively.</u> ”	Revised for clarity.
Page 2.2-67, Section 2.2.6.1	Section (1)(d) of Mitigation Measure M-BI-5 has been revised as follows: “Each nest identified in the project site shall be included in the NML. The NMLs should be updated daily and submitted to the CDFW <u>and USFWS</u> weekly.”	Revised for clarity.
Page 2.2-72, Section 2.2.6.1	Mitigation Measure M-BI-8 Prevention of Invasive Plant Species has been revised as follows: “The PDS landscape architect shall require that all <u>hydroseeding mix and any future final</u> landscape plans comply with the following: no invasive plant species, as included on the most recent version of the California Invasive Plant Council’s California Invasive Plant Inventory for the project region shall be included, and the plant palette shall be composed of native species that do not require high irrigation rates.”	Revised to address an erroneous reference to a final landscape plan. The project as currently designed does not include any landscaping, and as such a final landscaping plan will not be prepared. However, hydroseeding will be applied during construction, which would be required to comply with the measures listed in M-BI-8.
Pages 2.2-74 and 2.2-75, Section 2.2.6.1	The text included in reference to Mitigation Measure M-WF-1 has been corrected.	The text of Mitigation Measure M-WF-1 was incorrectly referenced in this section. The correct text of M-WF-1 was presented in Chapter 2.7, Wildfire, and within Table S-1 in Chapter S, Executive Summary, of the Draft EIR. The fire reduction measures presented in the incorrect version of M-WF-1 primarily require compliance with existing California Fire Code rules, which have already been incorporated into the project design. The fire reduction measures presented in the correct version of M-WF-1 expand upon the measures included in the incorrect version.
Chapter 2.3, Cultural Resources		
Page 2.3-16, Section 2.3.3.1	Revised a sentence to read: “Therefore, the segment does not qualify under Criterion 2.”	Revised to address a typographical error.

Page Number and Section/Table	Revision	Reason for Revision
Page 2.3-16, Section 2.3.3.1	Revised the less-than-significant impact conclusion to match the no impact conclusion in Section 2.3.5 and Section 2.3.7.	Revised for consistency with Section 2.3.5, Section 2.3.7, and the Historical Resource Technical Report, (Appendix E.2 of the Draft EIR). No significant historical resources exist within the project site, and no impacts would occur.
Page 2.3-18, Section 2.3.4, and Page 2.3-25, Section 2.3.7	The conclusion of the cultural resources cumulative impact analysis has been moved from Section 2.3.4 to Section 2.3.7.	The Draft EIR incorrectly included both the cumulative impact analysis and cumulative impact conclusion in Section 2.3.4 and did not carry the impact statements through to Section 2.3.7. The impact conclusion has been moved to Section 2.3.7 to maintain consistency with the organization of the EIR.
Chapter 2.5, Noise		
Page 2.5-4, Section 2.5.1.5, and Page 2.5-11, Section 2.5.3.1	A discussion of the project's noise modeling has been moved from Section 2.5.1 Existing Conditions to Section 2.5.3, Analysis of Project Effects and Determination as to Significance.	Revised for clarity.
Page 2.5-12, Section 2.5.3.1, and Page 2.5-20, Section 2.5.3.5	A discussion of the proposed blasting activities has been moved from Section 2.5.3.1, Methodology to Section 2.5.3.5 Ground-borne Vibration Impacts.	Revised for clarity.
Page 2.5-18, Section 2.5.3.3	The less-than-significant impact conclusion has been revised to match the potentially significant impact conclusion in Section 2.5.5 and Section 2.5.7.	Revised for consistency. The project's noise impacts during construction and decommissioning would be less than significant with mitigation as concluded in Section 2.5.5 and Section 2.5.7.
Page 2.5-19, Section 2.5.3.4	The less-than-significant impact conclusion has been revised to match the potentially significant impact conclusion in Section 2.5.5 and Section 2.5.7.	Revised for consistency. The project's noise impacts during operation and decommissioning would be less than significant with mitigation as concluded in Section 2.5.5 and Section 2.5.7.
Page 2.5-24, Section 2.5.6.1	Mitigation Measure M-N-2 has been revised to remove the specific setback distances for heavy duty construction equipment in section 2 of the measure.	Upon further review, implementation of the setbacks required in section 2 of M-N-2 would be infeasible. However, all other requirements of M-N-2 would be implemented, and the project would continue to comply with the County's 8-hour 75 dBA Leq standard at the project property lines adjoining existing occupied properties, which is the intent of the measure. Impacts would remain less than significant with mitigation, as concluded in Section 2.5.5 and Section 2.5.7.
Page 2.5-28, Section 2.5.7.2	Added reference to M-BI-10.	Revised for consistency with Section 2.2, Biological Resources.
Chapter 2.6, Tribal Cultural Resources		
Page 2.6-8, Section 2.6.4, and Page 2.6-12, Section 2.6.7	The conclusion of the tribal cultural resources cumulative impact analysis has been moved from Section 2.6.4 to Section 2.6.7.	The Draft EIR incorrectly included both the cumulative impact analysis and cumulative impact conclusion in Section 2.6.4 and did not carry the impact statements through to Section 2.6.7. The impact conclusion has been moved to Section 2.6.7 to maintain consistency with the organization of the EIR.

Page Number and Section/Table	Revision	Reason for Revision
Chapter 2.7, Wildfire		
Page 2.7-1, Section Introduction, and Page 2.7-13, Section 2.7.3.3	A reference to Appendix O.7, Battery Energy Storage System Plume Study (Hazard Dynamics 2026) has been added.	As discussed below, Appendix O.7 has been added to the Final EIR. Appendix O.7 provides supplemental information regarding the project's fire hazard analysis, including a plume study for the proposed BESS, based on input from the San Diego County Fire Protection District.
Page 2.7-18, Section 2.7.6.1	Section 3 of Mitigation Measure M-WF-2 Fuel Modification Zones has been revised as follows: "A 30-foot FMZ around the perimeter between from the fence line and (including the internal perimeter road) shall reduce vegetation to less than 6 inches and be regularly maintained."	Revised for clarity.
Page 2.7-18, Section 2.7.6.1	Section 8 of Mitigation Measure M-WF-2 Fuel Modification Zones has been revised as follows: " <u>If deemed necessary by County Fire, Vegetation</u> vegetation within the 14 internal open space easements shall be maintained to a vertical height of no more than 6 inches selectively cleared by hand to the extent required by written order for the express purpose of reducing an identified fire hazard. "	Revised for clarity.
Section 3.1.5 Hazards and Hazardous Materials		
Page 3.1.5-1, Section 3.1.5	A reference to Appendix O.7, Battery Energy Storage System Plume Study (Hazard Dynamics 2026) has been added.	As discussed below, Appendix O.7 has been added to the Final EIR. Appendix O.7 provides supplemental information regarding the project's fire hazard analysis, including a plume study for the proposed BESS, based on input from the San Diego County Fire Protection District.
Chapter 5, Mitigation Measures		
Page 5-3, Section 5.2	Mitigation Measure M-BI-3 Habitat Preservation has been revised to reference the County's BMO rather than the ECMSCP.	A draft map of the ECMSCP area, which the project is located within, was released in 2008; however, the actual ECMSCP has not yet been prepared by the County. As such, M-BI-3 would be implemented pursuant to the BMO, in addition to other County plans, rather than the ECMSCP.
Page 5-6, Section 5.2	Mitigation Measure M-BI-3 Habitat Preservation has been revised to remove an erroneous duplication of the following phrase: "Granting of this open space authorizes the County and its agents to periodically access the land to perform management and monitoring activities for the purposes of species and habitat conservation"	Revised to omit a repetitive statement.

Page Number and Section/Table	Revision	Reason for Revision
Page 5-6, Section 5.2	The timing of Mitigation Measure M-BI-3 Habitat Preservation has been revised as follows: " <u>In each phase, prior to approval of any grading and/or improvement plans and issuance of any grading or construction permits</u> Prior to approval of any plan or issuance of any permit in each phase, and prior to use of the premises in reliance of this permit the easements shall be recorded."	Revised for clarity.
Page 5-7, Section 5.2	The timing of Mitigation Measure M-BI-4 Resource Management Plan has been revised as follows: " <u>In each phase, prior to approval of any grading and/or improvement plans and issuance of any grading or construction permits</u> Prior to approval of any plan or issuance of any permit in each phase, and prior to use of the premises in reliance of this permit the RMP shall be approved."	Revised for clarity.
Page 5-7, Section 5.2	Mitigation Measure M-BI-5 Avian Breeding and Special-status Wildlife Impact Avoidance has been revised to spell out the acronym for the MBTA.	Revised for clarity.
Page 5-8, Section 5.2	Section (1)(a)(iii) of Mitigation Measure M-BI-5 has been revised as follows: "A monitoring and reporting plan detailing the information to be collected for incorporation into a regular Nest Monitoring Log (NML) with sufficient details to enable USFWS and CDFW to monitor the Applicant's compliance with <u>the MBTA</u> and Fish and Game Code Sections 3503, 3503.5, 3511, and 3513, <u>respectively</u> ."	Revised for clarity.
Page 5-8, Section 5.2	Section (1)(d) of Mitigation Measure M-BI-5 has been revised as follows: "Each nest identified in the project site shall be included in the NML. The NMLs should be updated daily and submitted to the CDFW <u>and USFWS</u> weekly."	Revised for clarity.
Page 5-14, Section 5.2	Mitigation Measure M-BI-8 Prevention of Invasive Plant Species has been revised as follows: "The PDS landscape architect shall require that all final landscape plans <u>hydroseeding mix</u> comply with the following: no invasive plant species, as included on the most recent version of the California Invasive Plant Council's California Invasive Plant Inventory for the project region shall be included, and the plant palette shall be composed of native species that do not require high irrigation rates."	Revised to address an erroneous reference to a final landscape plan. The project does not include a formal landscaping plan, however hydroseeding will be applied during construction, which would be required to comply with the measures listed in M-BI-8.
Page 5-23, Section 5.5	Mitigation Measure M-N-2 has been revised to remove the specific setback distances for heavy duty construction equipment in section 2 of the measure.	Upon further review, implementation of the setbacks required in section 2 of M-N-2 would be infeasible. However, all other requirements of M-N-2 would be implemented, and the project would continue to comply with the County's 8-hour 75 dBA Leq standard at the project property lines adjoining existing occupied properties, which is the intent of the measure. Impacts would remain less than significant with mitigation, as concluded in Section 2.5, Noise, of the Draft EIR.

Page Number and Section/Table	Revision	Reason for Revision
Page 5-26, Section 5.7	Section 3 of Mitigation Measure M-WF-2 Fuel Modification Zones has been revised as follows: "A 30-foot FMZ around the perimeter between from the fence line and (including the internal perimeter road) shall reduce vegetation to less than 6 inches and be regularly maintained."	Revised for clarity.
Page 5-27, Section 5.7	Section 8 of Mitigation Measure M-WF-2 Fuel Modification Zones has been revised as follows: " <u>If deemed necessary by County Fire, Vegetation</u> vegetation within the 44 internal open space easements shall be maintained to a vertical height of no more than 6 inches <u>selectively cleared by hand to the extent required by written order for the express purpose of reducing an identified fire hazard.</u> "	Revised for clarity.
Chapter 6, List of EIR Preparers and Persons and Organizations Contacted		
Page 6-3, Section 6.2	Information has been added regarding the preparers of the fire hazard studies (Appendix O.1 through O.7).	References to The Hiller Companies, LLC and relevant staff members who prepared Appendix O.1 through O.6 to the Draft EIR were erroneously omitted from the Draft EIR. References to Hazard Dynamics, the preparers of Appendix O.7, have also been added.
Chapter 7, References		
Pages 7-2, 7-13, and 7-23	A reference to Appendix O.7, Battery Energy Storage System Plume Study (Hazard Dynamics 2026) has been added.	As discussed below, Appendix O.7 has been added to the Final EIR. Appendix O.7 provides supplemental information regarding the project's fire hazard analysis, including a plume study for the proposed BESS, based on input from the San Diego County Fire Protection District.
Page 7-34	Several references have been added based on Chapter 8.0, Response to Comments.	Chapter 8.0, Response to Comments, includes several new references to support the County's analysis.
Appendices		
Appendix O.6 Preliminary First Responders Guide	The version of Appendix O.6 dated July 2025 has been replaced with a May 2026 version.	Appendix O.6 has been revised to address minor typographical errors and fill in missing information in the emergency contact table.
Appendix O.7 Battery Energy Storage System Plume Study	Appendix O.7 has been added to Final EIR.	Appendix O.7 provides supplemental information regarding the project's fire hazard analysis, including a plume study for the proposed BESS, based on input from the San Diego County Fire Protection District.
Appendix Q Facility Water Availability Agreement	Appendix Q has been added to the Final EIR.	Appendix Q provides information regarding the project's construction water sales agreement with the JCSD to support the County's response to comments related to groundwater impacts.

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