

## 8.2.5 Individual Comments and Responses

The following members of the public have submitted comments on the Draft EIR.

**Table 8.2.5-5. Public Comment Documents Received**

Respondent	Code
<b>Nandor Nevai</b> Letter received: August 1, 2025	I1
<b>Carl Anderson III</b> Letter received: August 8, 2025	I2
<b>Jacquelyn Valadez</b> Letter received: August 15, 2025	I3
<b>Thomas Wall</b> Letter received: August 15, 2025	I4
<b>Earl Goodnight</b> Letter received: August 21, 2025	I5
<b>Julita Rummeler</b> Letter received: September 4, 2025	I6
<b>Mikayla Brennan</b> Letter received: September 6, 2025	I7
<b>Dan Grunow</b> Letter received: September 6, 2025	I8
<b>Ken Kramer</b> Letter received: September 12, 2025	I9
<b>Miles Maeda</b> Letter received: September 14, 2025	I10
<b>Weena Joshi</b> Letter received: September 15, 2025	I11
<b>Matt Spencer</b> Letter received: September 15, 2025	I12
<b>Chantaia Soleil</b> Letter received: September 15, 2025	I13
<b>David Berggren</b> Letter received: September 15, 2025	I14
<b>Rebecca Berggren</b> Letter received: September 15, 2025	I15
<b>Mara Harris</b> Letter received: September 15, 2025	I16
<b>Dustin Valentine</b> Letter received: September 15, 2025	I17
<b>Melanie Zardeneta</b> Letter received: September 15, 2025	I18

**From:** [a345589144@fastmail.fm](mailto:a345589144@fastmail.fm)  
**To:** [Koutoufidis, Nicholas](#)  
**Subject:** [External] Re: Notice of Availability for the Draft EIR for the Starlight Solar Project (PDS2022-MUP-22-010)  
**Date:** Friday, August 1, 2025 7:46:22 AM

Nicholas, hi, my name is Nandor Nevai

I am a property owner with 40 acres there in Boulevard.  
My parcel is basically a square shape, west of Tule Jim Road, with the northwest corner being at that point where Fisher Road turns a corner north into McCain Lane.  
I have maps of the proposed Solar installation from years ago.  
I just wanted to notify you that my parcel is for Sale (there's a For Sale sign on it)  
In case the Solar people are interested.  
Thanks, NN

I1-1

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[a345589144@fastmail.fm](mailto:a345589144@fastmail.fm)

On Thu, Jul 31, 2025, at 6:53 PM, Koutoufidis, Nicholas wrote:

Hello,

Please see the attached Notice of Availability for the Draft Environmental Impact Report (DEIR) for the Starlight Solar project (PDS2022-MUP-22-010).

I am also reaching out to make sure that you receive a link to the DEIR public disclosure website below for the Starlight Solar project. Hard copy notices have also been mailed out to the individuals that previously provided mailing addresses.

Public Disclosure Website:  
[Starlight Solar \(sandiegocounty.gov\)](http://Starlight Solar (sandiegocounty.gov))

Please feel free to contact me if you have any questions.

Thank you,

**Nick Koutoufidis, MBA**  
Land Use & Environmental Planner | He/Him/His  
County of San Diego | Planning & Development Services  
Phone: (619) 356-8348 | Email: [Nicholas.Koutoufidis1@sdcounty.ca.gov](mailto:Nicholas.Koutoufidis1@sdcounty.ca.gov)  
**New Number: (619) 340-5481**

**Attachments:**

- Starlight Solar (PDS2022-MUP-22-010) Notice of Availability.pdf

**8.2.5.1      *Response to Comment Letter I1 from Nandor Nevai  
(received August 1, 2025)***

Comment No.	Response
I1-1	The commenter introduces themselves and states that their property adjacent to the project site is for sale. A copy of this comment letter will be included in the Final EIR, which will be provided to the County Board of Supervisors for review when the project is considered for approval. No comments regarding the environmental effects of the project were included in the letter; therefore, no changes to the EIR were determined to be necessary in response to this comment.

**From:** [carl3wooddesign@gmail.com](mailto:carl3wooddesign@gmail.com)  
**To:** [Koutoufidis, Nicholas](mailto:Koutoufidis, Nicholas)  
**Cc:** [Syda Stark; carlandersoniii@yahoo.com](mailto:Syda Stark; carlandersoniii@yahoo.com)  
**Subject:** [External] EIR Starlight Solar Project  
**Date:** Friday, August 8, 2025 12:12:47 PM

I would like the following concerns addressed.

- Water run-off mitigation. I 12-1
- Microclimate changes. I 12-2
- (Higher temperatures) I 12-3
- Flight path disruption I 12-4
- Limited water held for fire suppression, we need alot more than only 6 tanks. I 12-5
- Established of test wells on site, and quarterly testing for aquifer changes and the possible release of toxic chemicals. I 12-6
- The destruction of plant and wildlife and displacement of their natural habitat. Which is potentially irreversible. Some pants take generations to cultivate under pristine conditions. I 12-7
- High fire risk zone, the latest could potentially release even more toxins into the environment if the facility catches fire. I 12-8
- Air and sound pollution (humming noises) I 12-9
  
- Other questions. I 12-10
- Solar panel manufacturer.
- Battery fire suppression system

Carl Anderson III  
619-240-4575  
Boulevard CA.

[Yahoo Mail: Search, Organize, Conquer](#)

### 8.2.5.2 Response to Comment Letter I2 from Carl Anderson III (received August 8, 2025)

Comment No.	Response
I2-1	<p>The commenter requests that several concerns about the proposed project be addressed. The first concern listed is stormwater runoff mitigation.</p> <p>The County appreciates the commenter’s concern about stormwater runoff. The Draft EIR addresses water drainage and runoff in detail in Section 2.4 and adopts mitigation measure M-HY-1 to avoid the blockage and/or redirection of storm flows resulting from the accumulation of debris and/or detritus at wash crossings. As discussed in Section 2.4, Hydrology and Water Quality, of the Draft EIR, the project would be required to implement a stormwater pollution prevention plan (SWPPP). The SWPPP would include the project risk determination, identification of site runoff sampling locations, discussion of potential site pollutants, minimum best management practices (BMPs), construction site monitoring plan, and the water pollution control drawings. The exact location and type of temporary BMPs to be installed during construction would depend on site-specific conditions, the construction schedule, and proposed activities, all of which would be outlined in the construction SWPPP. Typical BMPs for similar projects include energy dissipaters, silt fences, fiber rolls, gravel/sandbags, construction road stabilization, and stabilized construction entrances. As the project-specific SWPPP is prepared, the location, type, and number of specific BMPs may be refined based on the final designs to most effectively achieve the objective of reducing turbidity and other pollutant loads in stormwater runoff. The proposed project will need to obtain approval for their postconstruction plans from both the County and the Colorado River Basin Regional Water Quality Control Board (RWQCB). Control measures to reduce the discharge of stormwater pollutants to the maximum extent practicable would include the following:</p> <ul style="list-style-type: none"> <li>• Implementation of site design and source control BMPs</li> <li>• Inclusion of low-impact development features that conserve natural features, set back development from natural water bodies, minimize imperviousness, maximize infiltration, and retain and slow runoff</li> <li>• Compliance with requirements for construction-phase controls on sediment and other pollutants</li> <li>• Outlet protection (e.g., energy dissipaters and velocity dissipation devices)</li> <li>• Inclusion of infiltration swales where feasible to reduce localized increases in peak runoff</li> </ul> <p>Through implementation of the SWPPP, as well as mitigation measure M-HY-1, the project would have less-than-significant impacts related to drainage and runoff. The full text of M-HY-1 is provided below for ease of reference:</p> <p><b>M-HY-1: Flood Fencing.</b> Prior to approval of final design plans, the applicant shall demonstrate to the satisfaction of the County Department of Public Works (DPW) Flood Control through hydrologic and hydraulic analyses, acceptable to DPW Flood Control and performed by a California-licensed engineer in accordance with standard engineering practice, that the design features for the perimeter fencing avoids the blockage and/or redirection of storm flows resulting from the accumulation of debris and/or detritus at wash crossings. This can be accomplished through a number of means such as a) use of breakaway fencing perpendicular to flood flows to prevent obstruction and accumulation of debris, b) use of fencing that spans washes (without posts) above the anticipated peak flow depth, or c) an alternative design measure that would avoid accumulations of detritus at perimeter fence wash crossings, subject to County approval.</p> <p>The applicant shall show the proposed fencing design or alternative design measure on the final grading plans. The associated drainage study shall contain hydrologic and hydraulic analyses, acceptable to DPW Flood Control and performed by a California-licensed engineer in accordance with standard engineering practice, that model the proposed fencing and/or design measures and demonstrate that the fencing shall not cause alteration of drainage patterns and/or flood hazards from pre-project conditions. The drainage study shall be in compliance with the County hydrology manual (County of San Diego 2003b) and the County hydraulic design manual (County of San Diego 2014).</p> <p>Prior to the approval of any grading and/or improvement plans and issuance of grading or construction permits, the drainage study and plans shall be approved. The County DPW Flood Control shall review and approve the hydrologic and hydraulic analyses contained in the drainage study and the final fencing design and layout to ensure the flood flow is fully mitigated to pre-project conditions.</p> <p>See also Global Response GR-3, Groundwater Impacts, for additional detail related to the project’s impacts related to hydrology. No changes to the EIR were determined to be necessary in response to this comment.</p>

Comment No.	Response
12-2	<p>The commenter expresses concern regarding microclimate effects, specifically the potential for the PV panels to increase ambient air temperature in and around the project site.</p> <p>Refer to response GR-4, Heat Island Effect. The County appreciates the commenter’s concern about potential microclimate changes. Given that there are no significance thresholds for the photovoltaic heat island effect and given the limited number of studies regarding this effect, there is no evidence that any possible increase in ambient temperature from the proposed project would significantly impact human health or the environment. No changes to the EIR were determined to be necessary in response to this comment.</p>
12-3	<p>The commenter expresses concern regarding the possibility of the project resulting in flight path disruption.</p> <p>The County acknowledges the commenter’s concern for aviation safety. The County has coordinated with the Federal Aviation Administration (FAA) as well as Naval Base Coronado regarding potential flight path disruption. As discussed in Section 2.1, Aesthetics, the project would have less-than-significant impacts related to glare. Analysis for the project used the GlareGauge (also known as Solar Glare Hazard Analysis Tool [SGHAT]) model developed by ForgeSolar and the U.S. Department of Energy’s Sandia National Laboratories to evaluate potential glare (see Appendix C). The analysis focused on potential glare effects on observation points and linear travel routes. Aircraft landing and approach were considered. The proposed project site is approximately 6.5 miles west of the County-owned and publicly used Jacumba Airport. Although the project is not located on airport property and therefore not subject to FAA jurisdiction under 14 Code of Federal Regulations 77 to protect airspace safety and is located beyond the 2-mile final approach as defined in the Interim Solar Policy, the Applicant has sought to voluntarily apply FAA ocular hazard standards (<i>Federal Register</i> 78:63276). The glare analysis results comply with the FAA standards described in the Interim Solar Policy. Review of the solar glare analysis and the project site lighting description indicates that proposed lighting, implemented in compliance with the County lighting ordinance and policies, would not result in substantial lighting impacts to military operating area day-to-day operations. The minimal glare modeled from the sensitive receptors does not create hazards such as flash blindness or continuous glare, nor adversely affect daytime or nighttime views in the area. Additionally, the Draft EIR addresses potential impacts related to airport hazards, hazards to emergency response aircraft, and cumulative airport hazards in Section 3.1.5 and determines impacts to be less than significant. As such, the project would not result in any impacts related to flight path disruption due to glare from the proposed photovoltaic (PV) panels or other hazards. No changes to the EIR were determined to be necessary in response to this comment.</p>
12-4	<p>The commenter expresses concern that the six 10,000-gallon water tanks would not be sufficient for fire suppression.</p> <p>See response GR-5, Wildfire Risks. The County appreciates the commenter’s fire suppression concerns. As detailed in the Construction Fire Protection Plan (FPP), to provide sufficient fire suppression capabilities, the project would have six 10,000-gallon water tanks with a flow of at least 250 gallons per minute (gpm), and fire department connections would be available. Water would be stored in aboveground tanks complying with National Fire Protection Association (NFPA) 22, Standard for Water Tanks for Private Fire Protection. A procedure for ongoing inspection and maintenance of tanks would be in place. The tank and fire engine connections would be located on the side of the access driveways. The width of the driveway at the water tank location would be at least 18 feet wide (travel width), plus an additional 10 feet; this width would be used for 50 feet of the driveway’s length to allow for fire engines to park and connect to the tank while leaving the road open. The tanks would be labeled “Fire Water: 10,000 gallons.” The Construction FPP concludes that the six 10,000-gallon water tanks would effectively reduce the probability of new ignitions and fire spread from the project. For clarity, water stored in these tanks is not intended to extinguish a battery fire within a storage container; rather, consistent with fire-service practice for battery energy storage system (BESS) incidents, water would be deployed for exposure protection and containment (e.g., cooling adjacent equipment/structures, wetting fuels within Fuel Modification Zones, and protecting life safety) to prevent fire spread to other batteries and to avoid off-site wildfire ignition. Accordingly, the on-site water supply functions as a measure to reduce the potential for off-site fire spread and to protect people and property, not as the primary extinguishing agent for a storage container level thermal runaway. As addressed in Section 2.7, Wildfire, of the Draft EIR, mitigation measure M-WF-3 incorporates BESS-specific measures to reduce spread potential from a fire starting in the BESS. No changes to the EIR were determined to be necessary in response to this comment.</p>
12-5	<p>The commenter requests that the project include groundwater testing wells on-site for quarterly testing of the capacity and water quality of the local groundwater aquifer.</p> <p>See Global Response GR-3, Groundwater Impacts. The County appreciates the commenter’s groundwater concerns. The project does not propose the use of any on-site wells, and it would therefore not result in drawdown of the local groundwater aquifer. Further, the project would not result in a significant increase in impervious surfaces or significantly alter the existing drainage pattern of the project site. As such, the project would not result in impacts related to groundwater recharge. The project would import nonpotable water for construction and fire suppression purposed from the Jacumba Community Services District (JCSD), and it would implement a Groundwater Monitoring and Mitigation Plan (GMMP) for the JCSD groundwater wells, which would supply water for the project. The GMMP would ensure that the project would not result in</p>

Comment No.	Response
	<p>significant impacts to the local groundwater aquifer. No changes to the EIR were determined to be necessary in response to this comment.</p>
I2-6	<p>The commenter states that the project would result in permanent impacts to plants and wildlife.</p> <p>The County appreciates the commenter's concerns related to plant and wildlife impacts. As discussed in Section 2.2, Biological Resources, of the Draft EIR, the project could have potentially significant impacts to biological resources. However, the project would implement the following mitigation measures, to minimize impacts to biological resource to the extent feasible: M-BI-1 (Biological Monitoring), M-BI-2 (Temporary Construction Fencing), M-BI-3 (Habitat Preservation), M-BI-4 (Resource Management Plan), M-BI-5 (Avian Breeding and Special-status Wildlife Impact Avoidance), M-BI-6 (Biological Monitoring of Stormwater Pollution Prevention Plan Implementation), M-BI-7 (Prevention of Chemical Pollutants), M-BI-8 (Prevention of Invasive Plant Species), M-BI-9 (Operations and Maintenance Signage), M-BI-10 (Noise Reduction), M-BI-11 (Mitigation Measures and Design Considerations for Jurisdictional Wetlands and Waterways), M-BI-12 (Wildlife Corridor), and M-BI-13 (Special-status Plants). As concluded in Section 2.2, Biological Resources, of the Draft EIR, implementation of these mitigation measures would reduce impacts to less than significant. As such, the Draft EIR and the Biological Resources Report (Appendix D to the Draft EIR) have sufficiently analyzed potential impacts to biological resources that satisfy County requirements. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I2-7	<p>The commenter expresses concern since the project would be located in a high fire risk zone, a release of potentially toxic emissions could occur if the project components caught fire.</p> <p>See response GR-5, Wildfire Risks. The County appreciates the commenter's concern regarding wildfire risk. The Draft EIR, which accounts for the project's location in a Very High Fire Hazard Severity Zone, concludes that, with the incorporation of M-WF-1 through M-WF-6, the project would not exacerbate the risk of fire ignition at the project site; therefore, environmental impacts were determined to be less than significant. M-WF-1 (Fire Protection Plan) requires the implementation of numerous risk reduction measures to ensure adequate fire mitigation, internal project site access, and safety during construction, operation, and decommissioning activities. M-WF-2 (Fuel Modification Zones) would require the implementation and maintenance of FMZs, which would reduce wildfire risks during project operations. M-WF-3 (Battery Energy Storage System Measures) requires the incorporation of safety measures that would reduce fire risk at the BESS and would reduce the spread potential from a fire starting in the BESS. M-WF-4 (Construction Fire Protection Plan) requires the implementation of a Construction Fire Protection Plan, which would reduce wildfire ignition risk during construction and decommissioning activities. M-WF-5 (Red Flag Warning Measures) outlines precautions during elevated weather conditions to minimize the potential of uncontrolled spread of a wildfire. Lastly, M-WF-6 (Fire Protection and Mitigation Agreement) requires the Applicant to enter into a Fire Protection and Mitigation Agreement with the San Diego County Fire Protection District (SDCFPD) to make a fair share contribution toward local emergency response capabilities (see Appendix P). These measures are consistent with the recommendations of the comprehensive FPP and applicable fire codes (see Appendix L). The FPP provides fire behavior modeling for on-site and off-site fuels, including under worst-case-scenario conditions. The results from the modeling would provide guidance for design and measures to lessen the threat of and hazards from ignitions and wildfires, including specifically during construction activities. Potential environmental impacts associated with wildfire have been adequately assessed in the Draft EIR, which addresses the project's location in a Very High Fire Hazard Severity Zone, and no new significant environmental issues have been identified.</p> <p>As discussed in Chapter 1.0, Project Description, Location, and Environmental Setting, the BESS facilities included in the proposed project would use lithium iron phosphate batteries. Lithium iron phosphate batteries have higher thermal stability and a higher thermal runaway threshold than lithium manganese cobalt batteries. As a result, lithium iron phosphate batteries are inherently safer with a lower risk of thermal runaway as compared to lithium manganese cobalt or traditional lithium-ion batteries (Evro et al. 2024).</p> <p>As detailed in the Construction FPP, each battery storage cabinet would have a metal frame with insulation, air conditioning, and fire suppression, with separate enclosures for the electronic controls, inverters, and rectifiers. There would be a built-in heat detection and fire protection system and a fire extinguishing system. The heat and fire detection system would be linked to an automatic inert gas suppression system within each cabinet. The containers would also have an interior aerosol fire suppression system. The NFPA has developed a new Standard for the Installation of Stationary Energy Storage Systems (NFPA 855). This standard addresses the design, construction, installation, commissioning, operation, maintenance, and decommissioning of stationary energy storage systems. The system would be designed in accordance with applicable NFPA safety standards. The BESS would be sited with a setback from off-site areas as a buffer against potential wildfire ignitions. The cabinets would not be walk-in containers; thus, the battery storage cabinets would be non-habitable structures per the state and local fire codes that are in place at the time a building permit application is submitted to the County.</p> <p>The Draft EIR concludes that, with the incorporation of M-WF-1 through M-WF-6, the project would not exacerbate the risk of fire ignition at the project site; therefore, environmental impacts were determined to be less than significant. Potential environmental impacts associated with wildfire have been adequately assessed</p>

Comment No.	Response
	<p>in the Draft EIR, and no new significant environmental issues have been identified. Therefore, no revisions to the Draft EIR are necessary.</p>
I2-8	<p>The commenter expresses concern related to potential air quality and noise impacts of the project.</p> <p>The County appreciates the commenter's concern related to air quality and noise impacts. As provided in Draft EIR Section 3.1.1, Air Quality, and the Air Quality and Greenhouse Gas Technical Study prepared for the proposed project (Appendix H.1) the annual, daily, and hourly construction-related air pollutant emissions would not exceed any of the applicable San Diego County Air Pollution Control District (SDAPCD) significance thresholds (see Table 3.1.1-5, Table 3.1.1-6, and Table 3.1.1-7). The project would also incorporate dust control practices which would minimize PM<sub>10</sub> and PM<sub>2.5</sub> emissions. The short-term construction emissions dispersed over a wide area would not expose sensitive receptors to substantial pollutant concentrations. Additionally, operational emissions of the project would be minimal and therefore, would not expose sensitive receptors to substantial pollutant concentrations. As such, the project would result in less-than-significant impacts related to air quality without mitigation.</p> <p>As provided in Draft EIR Section 2.5, Noise, and the Noise Analysis Report prepared for the proposed project (Appendix J.1), a noise measurement survey of the existing ambient noise environment consisting of a series of sound level measurements was conducted at nine locations in the project area on June 8, 2022 (see Figure 2.5-1). The measured sound levels in the project area ranged from approximately 30 A-weighted decibels (dBA) of continuous sound (Leq) to 43 dBA Leq (see Table 2.5-2). Based on the modeling results, noise levels at the project boundary would range up to 37 dBA Leq at the property line corner closest to the battery energy storage system (BESS) area. Therefore, noise levels would comply with County Noise Ordinance Section 36.404 and would not exceed the "rural noise standards" of 50 dBA from 7:00 a.m. to 10 p.m. and 45 dBA from 10:00 p.m. to 7:00 a.m. As shown on Figure 1-13 in Chapter 1.0, Project Description, Location, and Environmental Setting, with the exception of the Tule Wind Groundwater Permitting Project, all of the past, present, and reasonably anticipated future projects in the project area would be several miles away from the project site. Due to the attenuation of noise over large distances, it would not be expected that the noise generated during operation of the project would contribute to any cumulative noise impacts. Furthermore, the Draft EIR adopts mitigation measures M-N-1 and M-N-2 to reduce impacts associated with operational and construction-related noise to less than significant. Therefore, potential impacts related to noise and air quality have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
I2-9	<p>The commenter requests the project disclose the manufacturer of the proposed solar panels.</p> <p>The manufacturer of the equipment is unknown at this time and will be determined at issuance of a building permit. CEQA does not require the manufacturer of the PV modules to be disclosed in the EIR. CEQA requires that the EIR contain a general description of the project's technical characteristics but need not supply extensive detail beyond that needed for evaluation and review of environmental impacts. (14 CCR Section 15124(c)). Chapter 1.0, Project Description, Location, and Environmental Setting, of the Draft EIR describes the technical characteristics of the PV modules: approximately 235,516 PV modules that would produce a total rated capacity of 100 megawatts (MW) of AC-generating capacity (see page 1-5 of the Draft EIR). Chapter 1.0 also describes PV module mounting, appearance, including color and reflectivity, and life-expectancy (see page 1-6 of the Draft EIR). The County has determined that the Draft EIR's description of the technical characteristics of the PV modules is sufficient for the evaluation and review of potential environmental impacts associated with the PV modules. Therefore, no revisions to the Draft EIR are required.</p>
I2-10	<p>The commenter requests that the project disclose the type of battery fire suppression system to be included in the proposed BESS.</p> <p>The County appreciates the commenter's inquiry regarding BESS fire suppression. As discussed above in Response I2-9, the manufacturer of the equipment is unknown at this time and will be determined at issuance of a building permit. CEQA requires that the EIR contain a general description of the project's technical characteristics but need not supply extensive detail beyond that needed for evaluation and review of environmental impacts (State CEQA Guidelines Section 15124(c)). Chapter 1.0, Project Description, Location, and Environmental Setting, of the Draft EIR describes the technical characteristics of the BESS (see page 1-8 of the Draft EIR). The Draft EIR specifies the type of batteries as high-density, lithium iron phosphate or other types with an equivalent or higher level of safety (see page 1-9 of the Draft EIR). The Draft EIR also specifies that the battery management system would be purchased from vendors who are on track to have their equipment meet the following Underwriters Laboratories (UL) listings: UL 9540, 1741, 1973, 1642, and any other UL standards at the time of the application of the building permit (see page 1-9 of the Draft EIR). Section 2.7.3.3 of the Draft EIR specifies that the BESS would be designed in accordance with applicable NFPA safety standards and would be compliant with the NFPA's Standard 855, which addresses the design, construction, installation, commissioning, operation, maintenance, and decommissioning of stationary BESSs (see page 2.7-13 of the Draft EIR). The system would also be designed in accordance with, and would satisfy all requirements of, the California Fire Code and San Diego County Fire Department Interim Fire Protection Guidelines for BESS Facilities, as well as meet other applicable state and local requirements. The Draft EIR specifies that the final selection of the lithium iron phosphate-based energy storage system technology remains in process and that several preliminary studies (based upon an assumed technology) typically required for the</p>

Comment No.	Response
	<p>completion of a California Fire Code Section 1207.1.4, Hazard Mitigation Analysis, were prepared and included in the Draft EIR as appendices, including:</p> <ul style="list-style-type: none"> <li>• Appendix O.1 Preliminary Battery Energy Storage System Fire Risk Assessment and Heat Flux Analysis (Hiller 2025a)</li> <li>• Appendix O.2 Preliminary Battery Energy Storage System Failure Mode and Effects Analysis (Hiller 2025b)</li> <li>• Appendix O.3 Preliminary Balance of Plant Fire Risk Assessment (Hiller 2025c)</li> <li>• Appendix O.4 Preliminary Balance of Plant Failure Mode and Effects Analysis (Hiller 2025d)</li> <li>• Appendix O.5 Preliminary Balance of Plant Hazard Mitigation Analysis (Hiller 2025e)</li> <li>• Appendix O.6 Preliminary First Responders Guide (Hiller 2025f)</li> </ul> <p>Additionally, Appendix O.7 (Hiller 2025g) was added to the Final EIR which provides supplemental information regarding the project's fire hazard analysis based on input from the San Diego County Fire Protection District. Finally, mitigation measure M-WF-3 (Battery Energy Storage System Measures) specifies that each BESS shall have an automatic internal heat detection system linked to an inert gas system and an internal aerosol suppression system that is regularly tested and maintained to reduce the spread potential from a fire starting in the BESS (see page 2.7-18 of the Draft EIR). The County has determined that the Draft EIR's description of the technical characteristics of the BESS, including fire suppression capability, is sufficient for the evaluation and review of potential environmental impacts associated with the BESS. Therefore, no revisions to the Draft EIR are required.</p>

From: Jacquelyn Valadez valadezj8872@gmail.com  
To: nicholas.koutoufidis1@sdcounty.ca.gov  
Subject: [External] Proposed Starlight Solar Project in Boulevard  
Date: Mon, 11 Aug 2025 19:26:09 -0700

Hello,

I am a resident of Boulevard, CA, and I am writing to raise serious concerns about the proposed **Starlight Solar Project**(Project No. PDS2022-MUP-22-010), which is currently under review by the County.

I  
13-1

Our rural community, already underserved in terms of health services and emergency infrastructure, faces several **direct public health threats** from this project:

\*

**Air quality risks** due to construction-related **dust and diesel emissions**, especially hazardous in our high-wind region where many residents have asthma, COPD, or other respiratory issues.

I  
13-2

\*

**Groundwater depletion**, with unknown impacts on **residential and agricultural wells** that are the only water source for most of us.

I  
13-3

\*

**Fire risk and toxic exposure** from a large **lithium-ion battery energy storage system (BESS)** proposed in a known high fire severity zone.

I  
13-4

\*

**Lack of medical infrastructure and emergency access** in the event of fire, battery failure, or evacuation.

I  
13-5

These threats raise environmental justice concerns. We are a **small, underrepresented community** made up of seniors, tribal members, and low-income families who will bear the brunt of any mistakes or oversights.

I  
13-6

I respectfully request that:

\*

Your department conduct a **public health risk review** of the project,

\*

Engage in the CEQA review process,

\*

And consider community engagement to hear from local residents directly.

Please help us protect the health and safety of our people.

I  
13-7

Sincerely,

Jacquelyn Valadez  
Boulevard, CA 91905  
(619)565-4173

### 8.2.5.3 Response to Comment Letter I3 from Jacquelyn Valadez (received August 15, 2025)

Comment No.	Response
I3-1	<p>The commenter introduces the letter and expresses their opposition to the proposed project.</p> <p>A copy of this comment letter will be included in the Final EIR, which will be provided to the County Board of Supervisors for review when the project is considered for approval. Responses to the specific comments in the letter are provided below.</p>
I3-2	<p>The commenter expresses concern related to potential air quality impacts of the project due to dust and diesel emissions.</p> <p>The County appreciates the commenter's concern about air quality. As provided in Section 3.1.1, Air Quality, of the Draft EIR and the Air Quality and Greenhouse Gas Technical Study prepared for the proposed project (Appendix H.1 to the Draft EIR) the annual, daily, and hourly construction-related air pollutant emissions would not exceed any of the applicable San Diego County Air Pollution Control District (SDAPCD) significance thresholds for pollutants associated with diesel emissions (see Table 3.1.1-5, Table 3.1.1-6, and Table 3.1.1-7). The project would also incorporate dust control practices which would minimize PM<sub>10</sub> emissions (see page 3.1.1-17 of the Draft EIR). The short-term construction emissions dispersed over a wide area would not expose sensitive receptors to substantial pollutant concentrations. Additionally, operational emissions of the project would be minimal and therefore, would not expose sensitive receptors to substantial pollutant concentrations. As such, the project would result in less-than-significant impacts related to air quality without mitigation. Therefore, potential impacts related to air quality have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
I3-3	<p>The commenter states that the water demand of the project and reduced groundwater recharge would result in impacts to nearby residential wells.</p> <p>See Global Response GR-3, Groundwater Impacts. The County appreciates the commenter's concern about groundwater recharge. The project does not propose the use of any on-site wells and would therefore not result in drawdown of the local groundwater aquifer. Further, the project would not result in a significant increase in impervious surfaces or significantly alter the existing drainage pattern of the project site. As such, the project would not result in impacts related to groundwater recharge. The project would import nonpotable water for construction and fire suppression purposed from the Jacumba Community Services District (JCSD) and would implement a Groundwater Monitoring and Mitigation Plan (GMMP) for the JCSD groundwater wells which would ensure that the project would not result in significant impacts to the local groundwater aquifer. No changes to the EIR were determined to be necessary in response to this comment.</p>
I3-4	<p>The commenter expresses concern regarding the siting of a lithium-ion BESS facility in a high fire severity zone, and the potential release of toxic emissions that may occur if the project site caught fire.</p> <p>See Global Response GR-5, Wildfire Risks. The County appreciates the commenter's concern about wildfire risk. As discussed in Chapter 1.0, Project Description, Location, and Environmental Setting, of the Draft EIR, the BESS facilities included in the proposed project would use lithium iron phosphate batteries. Lithium iron phosphate batteries have higher thermal stability and a higher thermal runaway threshold than lithium manganese cobalt batteries. As a result, lithium iron phosphate batteries are inherently safer with a lower risk of thermal runaway as compared to lithium manganese cobalt or traditional lithium-ion batteries (Evro et al. 2024).</p> <p>As detailed in the Construction Fire Protection Plan (FPP), each battery storage cabinet would have a metal frame with insulation, air conditioning, and fire suppression, with separate enclosures for the electronic controls, inverters, and rectifiers. There would be a built-in heat detection and fire protection system and a fire extinguishing system. The heat and fire detection system would be linked to an automatic inert gas suppression system within each cabinet. The containers would also have an interior aerosol fire suppression system. The National Fire Protection Association (NFPA) has developed a new Standard for the Installation of Stationary Energy Storage Systems (NFPA 855). This standard addresses the design, construction, installation, commissioning, operation, maintenance, and decommissioning of stationary energy storage systems. The system would be designed in accordance with applicable NFPA safety standards. The BESS would be sited with a setback from off-site areas as a buffer against potential wildfire ignitions. The cabinets would not be walk-in containers; thus, the battery storage cabinets would be non-habitable structures per the state and local fire codes that are in place at the time a building permit application is submitted to the County.</p> <p>The Draft EIR concludes that, with the incorporation of M-WF-1 through M-WF-6, the project would not exacerbate the risk of fire ignition at the project site; therefore, environmental impacts were determined to be less than significant. Potential environmental impacts associated with wildfire have been adequately assessed in the Draft EIR, and no new significant environmental issues have been identified. Therefore, no revisions to the Draft EIR are necessary.</p>

Comment No.	Response
I3-5	<p>The commenter expresses concern regarding the lack of medical infrastructure and emergency access in Boulevard if evacuation was needed due to a fire at the project site.</p> <p>The County appreciates the commenter's concern regarding emergency access. See Global Response GR-5, Wildfire Risks, and I3-4 above. Additionally, the Draft EIR includes mitigation measure M-WF-6 which requires the Applicant to enter into a Fire Protection and Mitigation Agreement with the San Diego County Fire Protection District (SDCFPD) to make a fair share contribution toward local emergency response capabilities (see Appendix P and Section 2.7, Wildfire, of the Draft EIR). The full text of M-WF-6 is provided below for ease of reference:</p> <p style="padding-left: 40px;"><b>M-WF-6: Fire Protection and Mitigation Agreement.</b> As a condition to providing service and pursuant to the Safety Element of the General Plan, the Applicant shall enter into a Fire Protection and Mitigation Agreement with the San Diego County Fire Protection District (SDCFPD) prior to approval of a Major Use Permit to make a fair share contribution toward local emergency response capabilities. The funding shall be used by the SDCFPD to mitigate risks of wildfires and to enhance fire suppression and emergency services capabilities for the proposed project and the southeast portion of CSA 135.</p> <p>Section 2.7, Wildfire, of the Draft EIR specifies that there is one fire station within a 5-minute drive time, two stations within a 10-minute drive time, and an additional station within a 15-minute drive time, providing adequate firefighting capabilities. During construction and decommissioning of the project, there would be personnel on-site and a potential increase in demand for emergency services. However, any increase in the regional population associated with project construction or decommissioning activities would be temporary and minimal. Additionally, as part of PDF-TR-1 (Traffic Control Plan), the Applicant will establish procedures for coordinating with local emergency response agencies to ensure the dissemination of information regarding emergency response vehicle routes affected by construction and decommissioning activities. This would ensure that worker trips would not result in inadequate emergency access during construction or decommissioning. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I3-6	<p>The commenter states that the project would result in environmental justice impacts to the local community.</p> <p>See Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice. CEQA does not specifically reference "environmental justice," nor does it require analysis of environmental justice concerns (see <i>Golden Door Properties, LLC v. County of San Diego</i> (2020) 50 Cal.App.5th 467, 555 n.46). Instead, CEQA focuses on evaluating potentially significant environmental impacts, including those that are cumulatively considerable. Traditionally, environmental justice issues pertain to the effects of pollution on low-income communities (California Department of Justice 2012). Additionally, under the County of San Diego's General Plan, the community of Boulevard was not designated as an Environmental Justice community in the County. As described in GR-6, comments related to social and economic issues do not specifically relate to the environmental analysis included in the Draft EIR. This response is provided for informational purposes and will be considered by the Board during the project approval process and will be made available through publication of this Final EIR. These comments do not warrant revisions to the Draft EIR.</p>
I3-7	<p>The commenter requests that a public health risk review of the project be conducted.</p> <p>See Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice. The County appreciates the commenter's concern for public health. Potential environmental impacts of the project related to public health and the surrounding community are analyzed throughout the Draft EIR, specifically in Sections 2.5, Noise and 2.7, Wildfire, as well as Sections 3.1.1, Air Quality and 3.1.5, Hazards and Hazardous Materials. Section 3.1.1, Air Quality, of the Draft EIR specifies that a Health Risk Assessment was not deemed necessary for the project because criteria pollutant construction emissions are well below the CEQA thresholds and emissions of toxic air contaminants (TACs) are not expected to result in exposing widely dispersed sensitive receptors to substantial pollutant concentrations. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>

**From:** [Thomas Wall](#)  
**To:** [Koutoufidis, Nicholas](#)  
**Subject:** [External] Fwd: Formal Public Comment – Opposition to the Starlight Solar Project  
**Date:** Friday, August 15, 2025 2:23:43 PM  
**Attachments:** [DE558855-C5F2-46B2-A395-89EF039DE815.jpeg](#)  
[93C99FF3-2163-498A-A43D-F7E925968F1B.jpeg](#)

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**I included the photos at end so you have clarity and understanding about the precious resources we are protecting.**

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**Dear Mr. Koutoufidis,**

As a long-time resident of Boulevard, I am writing to express my strong and heartfelt opposition to the proposed **Starlight Solar Project** and to formally submit my public comment on the Draft Environmental Impact Report (EIR).

I4-1

While I support clean energy, I do not support sacrificing our community’s land, water, and safety for an energy project that provides us **no direct benefit**. This project is the wrong solution in the wrong place—and it sets a dangerous precedent for rural communities across San Diego County.

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**My major concerns include:**

I4-2

**Water Supply & Aquifer Risk**

The EIR’s claim that the Jacumba Community Services District will supply water has been publicly denied by the district itself. This is a glaring flaw in the report. Our shared aquifer is already stressed, and this project threatens the **drinking water wells that our families and farms depend on**.

**Heat Island Effect & Long-Term Climate Impact**

I4-3

Scientific studies show that utility-scale solar farms like this can **increase local temperatures by 2–8°F**. In a region already facing drought and extreme heat, this will create serious consequences for wildlife, agriculture, and human health. We must think beyond today. With **global temperatures rising**, how can we justify heating this land even more?

**Wildfire Risk**

I4-4

The addition of a 217 MW battery storage facility introduces major fire risks. Even with mitigation, the potential for **thermal runaway fires** in a dry, rural environment like Boulevard is dangerous—and deeply irresponsible.

**Habitat Loss & Wildlife Disruption**

I4-5

This project would destroy hundreds of acres of habitat and **fragment critical wildlife**

**corridors**, permanently impacting sensitive species. Once this land is industrialized, it will never be the same.

↑ I4-5  
↓ (cont'd)

### Water Runoff & Erosion

Grading and covering the land with solar panels and roads will dramatically **increase runoff, erosion, and flood risks**, while reducing natural groundwater recharge—an outcome with long-term consequences for the entire watershed.

I4-6

### Noise & Light Pollution

Construction noise, humming inverters, and 24/7 security lighting will disrupt both **rural peace and native ecosystems**. Residents and wildlife alike will suffer.

I4-7

### Visual Impacts & Rural Degradation

Even the EIR admits that this project will have **significant and unavoidable aesthetic impacts**. The vast sea of metal panels and fencing will permanently damage the natural beauty of our area and the views that define our community.

I4-8

### Property Value Loss

Turning a rural-agricultural zone into an industrial corridor will likely drive down home values and destabilize the character of our neighborhoods.

I4-9

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## There Are Smarter Solutions

Instead of disturbing our land and water, we should be investing in **better, lower-impact options**—like **solar rooftops, school and warehouse canopies, and the thousands of underused parking lots across San Diego County**.

But utility companies like **SDG&E make most of their profits by building infrastructure to transmit electricity over long distances**—not by encouraging local, distributed solar. This is why they continue to push projects like this one, which benefit their bottom line at the expense of **our land, our health, and our shared future**.

If we give in now, these industrial projects will continue spreading across rural areas—destroying one ecosystem at a time. We cannot allow that.

I4-10

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**We need to be smart, and we need to be ethical.** Rural communities like ours are not empty spaces to be sacrificed for energy profits. We are real people living close to the land, raising families, and stewarding this place for future generations.

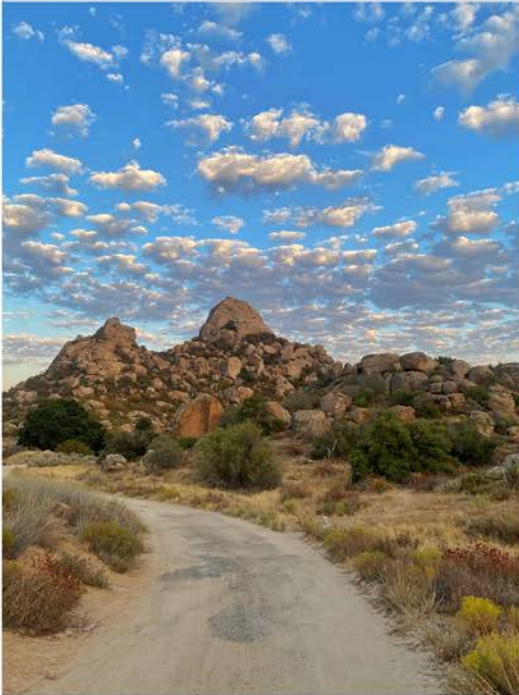
I urge you to **deny approval of the Starlight Solar Project** or, at the very least, require a **fully revised and recirculated EIR** that accurately reflects these grave environmental and community consequences.



Let's protect what matters—our land, our water, and our future.

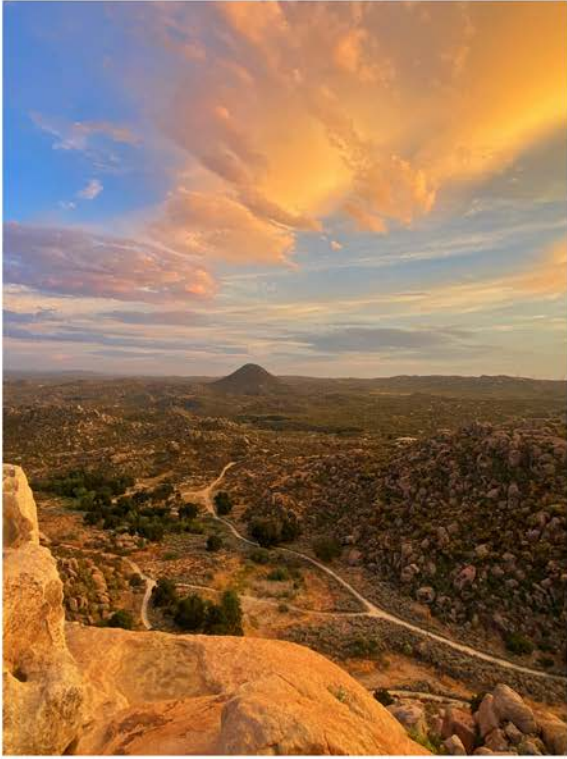
Sincerely,  
**Thomas Wall**  
Boulevard, CA Resident

Please confirm receipt of this public comment



↑  
I4-10  
(cont'd)

I4-11



I4-12

### 8.2.5.4 **Response to Comment Letter I4 from Thomas Wall (received August 15, 2025)**

Comment No.	Response
I4-1	<p>The commenter introduces the letter and expresses their opposition to the proposed project. The commenter goes on to state that while they support clean energy, they believe that the proposed project would result in significant impacts to the local community which would outweigh the potential benefits.</p> <p>Responses to the specific comments in the letter are provided below. A copy of this comment letter will be included in the Final EIR, which will be provided to the County Board of Supervisors for review when the project is considered for approval.</p>
I4-2	<p>The commenter states that the Draft EIR incorrectly assumes that water would be provided by the Jacumba Community Services District (JCSD) and expresses concern that the project would impact the local community's groundwater wells.</p> <p>See Global Response GR-3, Groundwater Impacts. The project does not propose the use of any on-site wells and would therefore not result in drawdown of the local groundwater aquifer. Further, the project would not result in a significant increase in impervious surfaces or significantly alter the existing drainage pattern of the project site. As such, the project would not result in impacts related to groundwater recharge. Chapter 1.0, Project Description, Location, and Environmental Setting, of the Draft EIR states that operational water demand will be supplied by the JCSD (see page 1-12 of the Draft EIR). According to the Groundwater Resources Investigation Report prepared for the proposed project (Appendix G.5), the JCSD has sufficient capacity to serve the project during construction, operation, and decommissioning, in addition to other approved and proposed projects in the nearby vicinity. Additionally, according to the sales agreement dated June 28, 2022, the JCSD would have sufficient water supplies to support the proposed project. No changes to the EIR were determined to be necessary in response to this comment.</p>
I4-3	<p>The commenter states that studies have shown that utility-scale solar projects can increase local temperatures by 2 to 8 degrees Fahrenheit and expresses concern regarding potential heat island effects.</p> <p>Refer to Global Response GR-4, Heat Island Effect. Given that there are no significance thresholds for the photovoltaic heat island effect and given the limited number of studies regarding this effect, there is no evidence that any possible increase in ambient temperature from the proposed project would significantly impact human health or the environment. No changes to the EIR were determined to be necessary in response to this comment.</p>
I4-4	<p>The commenter expresses concern that the introduction of a 217-megawatt (MW) energy storage facility would increase wildfire risk due to the potential for a thermal runaway fire at the project site.</p> <p>See Global Response GR-5, Wildfire Risks. The County appreciates the commenter's concern related to wildfire risk. As discussed in Chapter 1.0, Project Description, Location, and Environmental Setting, the battery energy storage system (BESS) facilities included in the proposed project would use lithium iron phosphate batteries. Lithium iron phosphate batteries have higher thermal stability and a higher thermal runaway threshold than lithium manganese cobalt batteries. As a result, lithium iron phosphate batteries are inherently safer with a lower risk of thermal runaway as compared to lithium manganese cobalt or traditional lithium-ion batteries (Evro et al. 2024).</p> <p>As detailed in the Construction Fire Protection Plan (FPP), each battery storage cabinet would have a metal frame with insulation, air conditioning, and fire suppression, with separate enclosures for the electronic controls, inverters, and rectifiers. There would be a built-in heat detection and fire protection system and a fire extinguishing system. The heat and fire detection system would be linked to an automatic inert gas suppression system within each cabinet. The containers would also have an interior aerosol fire suppression system. The National Fire Protection Association (NFPA) has developed a new Standard for the Installation of Stationary Energy Storage Systems (NFPA 855). This standard addresses the design, construction, installation, commissioning, operation, maintenance, and decommissioning of stationary energy storage systems. The system would be designed in accordance with applicable NFPA safety standards. The BESS would be sited with a setback from off-site areas as a buffer against potential wildfire ignitions. The cabinets would not be walk-in containers; thus, the battery storage cabinets would be non-habitable structures per the state and local fire codes that are in place at the time a building permit application is submitted to the County.</p> <p>The Draft EIR concludes that, with the incorporation of M-WF-1 through M-WF-6, the project would not exacerbate the risk of fire ignition at the project site; therefore, environmental impacts were determined to be less than significant. Potential environmental impacts associated with wildfire have been adequately assessed in the Draft EIR, and no new significant environmental issues have been identified. Therefore, no revisions to the Draft EIR are necessary.</p>
I4-5	<p>The commenter states that the project would result in permanent impacts to plants and wildlife and would fragment wildfire corridors.</p>

Comment No.	Response
	<p>The County appreciates the commenter's concern related to biological impacts. Section 2.2, Biological Resources, of the Draft EIR discusses and evaluates potential impacts to biological resources, including plants and wildlife and the potential fragmentation of habitat. As discussed in Section 2.2, potentially significant impacts to biological resources would be mitigated to less than significant with the implementation of the following mitigation measures: M-BI-1 (Biological Monitoring), M-BI-2 (Temporary Construction Fencing), M-BI-3 (Habitat Preservation), M-BI-4 (Resource Management Plan), M-BI-5 (Avian Breeding and Special-status Wildlife Impact Avoidance), M-BI-6 (Biological Monitoring of Stormwater Pollution Prevention Plan Implementation), M-BI-7 (Prevention of Chemical Pollutants), M-BI-8 (Prevention of Invasive Plant Species), M-BI-9 (Operations and Maintenance Signage), M-BI-10 (Noise Reduction), M-BI-11 (Mitigation Measures and Design Considerations for Jurisdictional Wetlands and Waterways), M-BI-12 (Wildlife Corridor), and M-BI-13 (Special-status Plants). Regarding the fragmentation of wildlife corridors, M-BI-12 requires the project to provide wildlife-friendly fencing to allow for wildlife movement within the project site (see page S-26 of the Draft EIR).</p> <p>Therefore, the Draft EIR and the Biological Resources Report (Appendix D to the Draft EIR) have sufficiently analyzed potential impacts to biological resources in accordance with CEQA. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
14-6	<p>The commenter states that the project would result in increased runoff, erosion, and flood risks at the project site, and would reduce groundwater recharge of the local groundwater aquifer.</p> <p>The County appreciates the commenter's concerns regarding runoff and groundwater recharge. The Draft EIR addresses potential water runoff, erosion, flood risk, and aquifer recharge impacts in detail in Section 2.4, Hydrology and Water Quality, and adopts mitigation measure M-HY-1 to avoid the blockage and/or redirection of storm flows resulting from the accumulation of debris and/or detritus at wash crossings. As discussed in Section 2.4, the project would be required to implement a stormwater pollution prevention plan (SWPPP). The SWPPP would include the project risk determination, identification of site runoff sampling locations, discussion of potential site pollutants, minimum best management practices (BMPs), construction site monitoring plan, and the water pollution control drawings. The exact location and type of temporary BMPs to be installed during construction would depend on site-specific conditions, the construction schedule, and proposed activities, all of which would be outlined in the construction SWPPP. Typical BMPs for similar projects include energy dissipaters, silt fences, fiber rolls, gravel/sandbags, construction road stabilization, and stabilized construction entrances. As the project-specific SWPPP is prepared, the location, type, and number of specific BMPs may be refined based on the final designs to most effectively achieve the objective of reducing turbidity and other pollutant loads in stormwater runoff. The proposed project will need to obtain approval for their postconstruction plans from both the County and the Colorado River Basin Regional Water Quality Control Board (RWQCB). Control measures to reduce the discharge of stormwater pollutants to the maximum extent practicable would include the following:</p> <ul style="list-style-type: none"> <li>• Implementation of site design and source control BMPs</li> <li>• Inclusion of low-impact development features that conserve natural features, set back development from natural water bodies, minimize imperviousness, maximize infiltration, and retain and slow runoff</li> <li>• Compliance with requirements for construction-phase controls on sediment and other pollutants</li> <li>• Outlet protection (e.g., energy dissipaters and velocity dissipation devices)</li> <li>• Inclusion of infiltration swales where feasible to reduce localized increases in peak runoff</li> </ul> <p>Through implementation of the SWPPP, as well as mitigation measure M-HY-1, the project would have less-than-significant impacts related to drainage and runoff. The full text of M-HY-1 is provided below for ease of reference:</p> <p><b>M-HY-1: Flood Fencing.</b> Prior to approval of final design plans, the applicant shall demonstrate to the satisfaction of the County Department of Public Works (DPW) Flood Control through hydrologic and hydraulic analyses, acceptable to DPW Flood Control and performed by a California-licensed engineer in accordance with standard engineering practice, that the design features for the perimeter fencing avoids the blockage and/or redirection of storm flows resulting from the accumulation of debris and/or detritus at wash crossings. This can be accomplished through a number of means such as a) use of breakaway fencing perpendicular to flood flows to prevent obstruction and accumulation of debris, b) use of fencing that spans washes (without posts) above the anticipated peak flow depth, or c) an alternative design measure that would avoid accumulations of detritus at perimeter fence wash crossings, subject to County approval.</p> <p>The applicant shall show the proposed fencing design or alternative design measure on the final grading plans. The associated drainage study shall contain hydrologic and hydraulic analyses, acceptable to DPW Flood Control and performed by a California-licensed engineer in accordance with standard engineering practice, that model the proposed fencing and/or design measures and demonstrate that the fencing shall not cause alteration of drainage patterns and/or flood hazards from pre-project conditions. The drainage study shall be in compliance with the County hydrology manual (County of San Diego 2003b) and the County hydraulic design manual (County of San Diego 2014).</p>

Comment No.	Response
	<p>Prior to the approval of any grading and/or improvement plans and issuance of grading or construction permits, the drainage study and plans shall be approved. The County DPW Flood Control shall review and approve the hydrologic and hydraulic analyses contained in the drainage study and the final fencing design and layout to ensure the flood flow is fully mitigated to pre-project conditions.</p> <p>See also Global Response GR-3, Groundwater Impacts. The project would not result in a significant increase in impervious surfaces or significantly alter the existing drainage pattern of the project site. As such, the project would not result in impacts related to groundwater recharge. The project would implement a Groundwater Monitoring and Mitigation Plan (GMMP) for the JCSD groundwater wells which would ensure that the project would not result in significant impacts to the local groundwater aquifer. No changes to the EIR were determined to be necessary in response to this comment.</p>
14-7	<p>The commenter states that construction and operation of the project would result in noise impacts, and that the proposed 24/7 security lighting system would contribute toward light pollution.</p> <p>The County acknowledges the commenter's concerns regarding noise and lighting. As provided in Section 2.5, Noise, and the Noise Analysis Report prepared for the proposed project (Appendix J.1), a noise measurement survey of the existing ambient noise environment consisting of a series of sound level measurements was conducted at nine locations in the project area on June 8, 2022 (see Figure 2.5-1). The measured sound levels in the project area ranged from approximately 30 A-weighted decibels (dBA) continuous sound level (Leq) to 43 dBA Leq (see Table 2.5-2). Based on the modeling results, noise levels at the project boundary would range up to 37 dBA Leq at the property line corner closest to the BESS area. Therefore, noise levels would comply with County Noise Ordinance Section 36.404 and would not exceed the "rural noise standards" of 50 dBA from 7:00 a.m. to 10 p.m. and 45 dBA from 10:00 p.m. to 7:00 a.m. As shown on Figure 1-13 in Chapter 1.0, Project Description, Location, and Environmental Setting, with the exception of the Tule Wind Groundwater Permitting Project, all of the past, present, and reasonably anticipated future projects in the project area would be several miles away from the project site. Due to the attenuation of noise over large distances, it would not be expected that the noise generated during operation of the project would contribute to any cumulative noise impacts. Furthermore, the Draft EIR adopts mitigation measures M-N-1 and M-N-2 to reduce impacts associated with operational and construction-related noise to less than significant.</p> <p>Regarding lighting, the proposed lighting fixtures would only be installed at the gated entrances around the perimeter of the project site and would consist of motion-activated low-pressure sodium bulbs. As discussed throughout the EIR, the lighting would be required to comply with the San Diego County Light Pollution Code, also known as the Dark Sky Ordinance. As stated in Chapter 1.0, Project Description, Location, and Environmental Setting:</p> <p style="padding-left: 40px;">All lighting would have bulbs that do not exceed 100 watts or equivalent, and all lights would be shielded, directed downward, and would comply with the County Light Pollution Code (County Code Sections 51.201–51.209), also known as the Dark Sky Ordinance. Outdoor lighting circuits would incorporate dusk-to-dawn photocell controllers, occupancy sensors, and/or switches as appropriate. Additionally, lighting for the project would be designed in accordance with the County Zoning Ordinance, Sections 6320, 6322, and 6324, which guide performance standards for glare, and controls excessive or unnecessary outdoor light emissions (County of San Diego 2012).</p> <p>As concluded in Section 2.1, Aesthetics, the proposed project would not result in any significant impacts related to lighting or glare. By adhering to the lighting requirements in the County Zoning Code, the lighting included in the proposed project would not result in impacts to wildlife species or habitat. Therefore, potential impacts related to noise and lighting have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>

Comment No.	Response
I4-8	<p>The commenter expresses concern regarding the project's significant and unavoidable impacts to visual resources.</p> <p>See Global Response GR-1, Visual Impacts. The County appreciates the commenter's concern regarding visual impacts. As discussed in the Draft EIR, the project would result in significant and unavoidable impacts to visual resources. Specifically, as detailed in Section 2.1, Aesthetics, the project would result in significant impacts related to Visual Character and Quality (Impact AE-1), Valued Visual Character and Image of Neighborhood or Community (Impact AE-2), and Focal and Panoramic Vistas (Impact AE-3). No feasible mitigation measures have been identified to reduce the visual impacts of the project to a less than significant level. As provided in State CEQA Guidelines Section 15091(a)(3), CEQA does not require the adoption of infeasible mitigation measures. Additionally, as provided in State CEQA Guidelines Section 15370, CEQA does not require the adoption of mitigation measures that would not avoid or substantially lessen significant environmental impacts. Here, the County has determined that no feasible mitigation measures would reduce visual impacts to a level that is less than significant. In order for an increased buffer distance to successfully avoid impacts, the buffer would have to be so large as to make implementation of the project infeasible. Any buffer distance that could be feasibly incorporated into the project design would not substantially lessen visual impacts. Additional information has been added to Section 2.1, Aesthetics, to further 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 (see pages 2.1-36 and 2.1-37). Here, the County has determined that no feasible mitigation measure, including increased buffer distance, would reduce visual impacts to a level that is less than significant. As such, if the proposed project is approved, the County will prepare a Statement of Overriding Considerations, as required by CEQA Guidelines Section 15093. The comments received on the Draft EIR will be included in the project's administrative record and presented to the Board of Supervisors (Board) for review. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I4-9	<p>The commenter states that the project would decrease property values and would impact the character of the local community.</p> <p>See Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice. Comments related to social and economic issues, such as decreases in property value, do not specifically relate to the environmental analysis included in the Draft EIR. This response is provided for informational purposes and will be considered by the Board during the project approval process and will be made available through publication of this Final EIR. These comments do not warrant revisions to the Draft EIR. As discussed in the Draft EIR, the project would result in significant and unavoidable impacts to visual resources. Specifically, as detailed in Section 2.1, Aesthetics, the project would result in significant impacts related to Visual Character and Quality (Impact AE-1), Valued Visual Character and Image of Neighborhood or Community (Impact AE-2), and Focal and Panoramic Vistas (Impact AE-3). No feasible mitigation measures have been identified to reduce the visual impacts of the project to a less than significant level. As such, if the proposed project is approved, the County will prepare a Statement of Overriding Considerations, as required by CEQA Guidelines Section 15093. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>

Comment No.	Response
14-10	<p>This comment concludes the letter and suggests that the County focus on implementing rooftop solar rather than utility-scale solar facilities.</p> <p>As discussed in Chapter 4.0, Project Alternatives, of the Draft EIR, an alternative location for the project would not be feasible. State CEQA Guidelines Section 15126.6(f)(1) lists several factors that may be considered when addressing feasibility of alternatives (any alternative, not just alternative locations) and states that “No one of these factors establishes a fixed limit on the scope of reasonable alternatives.” Specifically, an alternative site need not be considered when implementation is “remote and speculative,” such as when the alternative site is beyond the control of a project applicant (<i>Goleta Union School District v. Regents of University of California 1995</i>). No other readily available undeveloped parcels of comparable size exist in the eastern part of the County that could accommodate the project. Other sites have either already been evaluated and deemed unsuitable for similar solar development, lack sufficient access, are too distant from existing infrastructure, or are not available for acquisition by the applicant within a reasonable timeframe. As such, a feasible alternative site was not identified.</p> <p>According to the County’s Regional Decarbonization Framework, rooftop solar, while an important option for achieving the County’s decarbonization goals, is typically more expensive per megawatt than utility-scale solar projects, and can often be difficult to implement:</p> <p style="padding-left: 40px;"><i>Most residential solar installations in the San Diego region are on single-family homes. Several challenges make it difficult to install solar technology on multifamily rental buildings. The building owner would have to pay for the installation but would not necessarily realize any benefit, and the tenants would benefit but they do not own the building or control operational decisions. In addition, if solar is installed it can be difficult to allocate the electric production to each tenant in a building.</i></p> <p>According to the San Diego County Regional Decarbonization Framework, both rooftop solar and utility-scale solar projects would need to be implemented in order to meet the energy demand of the region while relying on renewable resources. As shown in Table 2.5 of the Regional Decarbonization Framework Technical Report, relying solely on rooftop solar would result in a significant energy deficit (County of San Diego 2022). Therefore, the County would be unable to achieve their renewable energy goals without the use of utility-scale solar projects, such as the project. As such, rooftop solar would not be a feasible alternative to the project.</p> <p>Furthermore, the basic purpose of an EIR’s alternatives discussion is to determine if fundamental project objectives might be achieved at less environmental cost. Although alternatives need not implement all project objectives, an EIR is not required to include alternatives that are incompatible with the project’s fundamental purpose (see <i>In re Bay-Delta Programmatic Env’t Impact Report Coordinated Proceedings</i> (2008) 43 Cal.4th 1143, 1165). Here, as provided in Chapter 1.0, Project Description, Location, and Environmental Setting, the project’s fundamental objective is to permit, construct, and operate utility-scale solar energy and battery storage as near as possible to existing San Diego Gas &amp; Electric (SDG&amp;E) transmission infrastructure in eastern San Diego County. Utility-scale solar and distributed solar projects, such as rooftop solar systems, fundamentally differ in size and in the location of their connection to the electrical grid. Here, the project’s first objective is to develop a large, utility-scale system consisting of a 100-MW solar energy system and a 217-MW BESS that is connected to SDG&amp;E’s high-voltage transmission infrastructure. Distributed energy resources such as rooftop solar are smaller scale systems connected to the electrical grid at the distribution level (California Energy Commission 2025). Therefore, the commenters’ proposed rooftop solar alternative would be incompatible with the project’s fundamental purpose, and the EIR is not required to evaluate the rooftop solar alternative. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
14-11	<p>The commenter includes a photograph of the project site.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not required and no changes to the EIR were determined to be necessary in response to this comment.</p>

**From:** [Earl Goodnight](#)  
**To:** [Koutoufidis, Nicholas](#)  
**Subject:** [External] Starlight Solar comment letter  
**Date:** Thursday, August 21, 2025 12:48:36 PM  
**Attachments:** [Goodnight's comment letter.docx](#)

---

Hi Nick,  
Please accept and log the attached Starlight Solar comment letter.

**I I5-1**

Have a safe day,  
Earl and Beverly Goodnight



VINCE NICOLETTI  
DIRECTOR

PLANNING & DEVELOPMENT SERVICES  
5510 OVERLAND DRIVE, SUITE 210, SAN DIEGO, CALIFORNIA 92123  
(858) 505-6445 General • (858) 694-2705 Codes Compliance  
(858) 565-5920 Building Services

STARLIGHT SOLAR PROJECT DRAFT EIR  
DRAFT EIR PUBLIC MEETING -AUGUST 7, 2025  
COMMENT SHEET

**Chapter 2, Section 2,1      Aesthetics**

There is a residence within 200 feet of the northwest corner of the project. What will be done to reduce the visual impact to this home owner? The alternate plan layout removes the panels to the east but the south located panels remain too close. Additionally the view from our residence looking east, within less than 1/2 mile, will have solar panels in our view starting at Jewel Valley Road mile marker 1.0 to mile marker 1.4 (photo looking east is included for clarification). In reviewing the provided before and after photos, none were taken near residences. The main concern was views from major roadways that would affect passing traffic.

I5-2

I5-3

Solar generation of electricity is the best clean energy option for our region, but should be placed in an area that doesn't infringe on neighbors or impact the panoramic views of the region.

I5-4

This being said the Starlight Solar's 20mw defies both neighbors and aesthetics. If this section of the project was moved to the 80mw group, these two problems would be eased.

**Chapter 3, Section 3.1.9      Transportation and Traffic**

A traffic issue needs to be addressed. Currently our family and nine other residents use Jewel Valley Way to access Jewel Valley Road. At this intersection north bound traffic on Jewel Valley Road approach Jewel Valley Way as a blind intersection. The speed limit on Jewel Valley Road is 55 miles per hour. Local residents are aware of the dangerous intersection and during normal traffic conditions the risk is minimal. However, the additional construction traffic created by this project will accelerate the risk of a collision at the intersection.

I5-5

It is essential that a comprehensive traffic management plan be implemented, should construction proceed, including clear signage, reduced speed limits near the intersection, and supplying a traffic control (flag person) near the intersection. Additionally, open communication with residents about construction timelines would help ensure the safety and peace of the community.

I5-6

On a broader scale, I urge decision makers to weigh the undeniable benefits of solar energy against the importance of thoughtful site placement and community impact. With careful planning and genuine engagement, our region can lead in clean energy innovation while preserving the character and safety of our neighborhoods.

I5-7

The house on the left is in the northwest part of the Starlight project, near mile marker 1.0. The blue line represents Jewel Valley Road. Solar panels will cover nearly 0.4 miles going south (right in the picture).



View looking east from 1902 Jewel Valley Lane

I5-3  
(cont'd)

Earl & Beverly Goodnight

1902 Jewel Valley Lane  
Boulevard. CA 91905

### 8.2.5.5 **Response to Comment Letter I5 from Earl Goodnight (received August 21, 2025)**

Comment No.	Response
I5-1	<p>This comment introduces the letter on the proposed project.</p> <p>Responses to the specific comments in the letter are provided below. A copy of this comment letter will be included in the Final EIR, which will be provided to the County Board of Supervisors for review when the project is considered for approval.</p>
I5-2	<p>The commenter requests that the project address the potential visual impact to a residence located 200 feet to the northwest of the project site. The commenter notes that the Visual Buffer Alternative would remove the panels to the east of the existing residence, but not to the south.</p> <p>See Global Response GR-1, Visual Impacts. The County appreciates the commenter’s concern related to visual impacts. The project, as currently proposed, includes a minimum buffer of 30 feet, between the proposed project components and the boundaries of the project site. Additionally, as discussed in PDF-AE-1, the Applicant will coordinate with the resident of any existing private residence located within a distance of 500 feet of a project solar panel installation to assess possible remedies, including financial assistance, for the installation of visual screening measures, including landscape screening. For ease of reference, PDF-AE-1 states:</p> <p style="padding-left: 40px;">The Applicant will coordinate with the resident of any existing (existing as of the date of this Major Use Permit Decision) private residence located within a distance of 500 feet of a project solar panel installation to assess visibility impact complaints made within 1 year from the initial operations date of the project. This assessment would include possible remedies that the Applicant may implement depending upon the level of visibility impacts occurring at the residence, including financial assistance for the installation of visual screening measures, such as landscaping or fencing. Requests for assistance can be made through a project hotline to be established by the Applicant and published on the Applicant’s website.</p> <p>Therefore, the County recommends that the commenter coordinate with the project Applicant via PDF-AE-1. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I5-3	<p>The commenter provides an image of the view from their personal residence looking toward the project site and states that the project would interrupt their views. The commenter also notes that the Draft EIR does not include visual simulations of views from existing residences.</p> <p>See Response I4-2, above. Although impacts to private views are not considered significant under CEQA and mitigations for private views are not required, the Draft EIR recognizes that local residents will be sensitive to views of the project from private residences. Therefore, the Draft EIR includes project design feature PDF-AE-1, which would help screen views of the project from nearby private residences. Additionally, an analysis of the project’s direct and indirect impacts related to visual resources and aesthetics is provided in Section 2.1, Aesthetics, of the Draft EIR. The information provided in this section is based on the Visual Resources Assessment (Appendix C) prepared for the proposed project. Therefore, potential impacts to visual resources have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
I5-4	<p>The commenter expresses their support of renewable energy, but states that utility-scale solar should be located in areas that would minimize visual impacts. The commenter also requests that the capacity of the project should be reduced to 80 megawatts (MW) to provide additional buffer between the project and existing residences.</p> <p>See Global Response GR-1, Visual Impacts. A reduced project footprint was considered in the Draft EIR. The project, as currently proposed, would include 588 acres of development. However, as discussed in Chapter 4.0, Project Alternatives, of the Draft EIR, the “Reduced Development Alternative” proposes to implement a smaller version of the project. Under the Reduced Development Alternative, the development footprint would be 538 acres, a reduction of 50 acres from the proposed project. This alternative would remove approximately 50 acres of solar arrays and infrastructure in the northern portion of the project (Areas A-1 and A-2). This reduction in the development footprint would remove solar arrays from the northern side of the ridgeline and provide a visual buffer between the proposed solar facility, Old Highway 80, I-8, and some of the off-site private properties. CEQA provides that the lead agency, in the Final EIR, may reject alternatives that do not satisfy project goals, do not offer substantial environmental advantages, or are infeasible given economic, environmental, or technological factors involved (see <i>Bay Area Citizens v. Association of Bay Area Governments</i> (2016) 248 Cal.App.4th 966).</p> <p>With respect to aesthetics, the Draft EIR provides an extensive analysis of potential impacts to aesthetic resources and states that no feasible mitigation measures have been identified to reduce the visual impacts of the project to a less-than-significant level (see Section 2.1, Aesthetics). As provided in State CEQA Guidelines Section 15126.4(a)(3), CEQA does not require the adoption of infeasible mitigation measures or mitigation measures that would not avoid or lessen significant environmental impacts. Here, the County has determined that no feasible mitigation measure, including increased buffer distance, would reduce visual</p>

Comment No.	Response
	<p>impacts to a level that is less than significant. As the Draft EIR acknowledges the significant and unavoidable impact to visual resources and incorporates all feasible reduction measures, no revisions to the Draft EIR are required and a Statement of Overriding Considerations will be prepared. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
<p>15-5</p>	<p>The commenter states that the construction vehicle trips generated by the project could increase the risk of traffic collisions, specifically at the intersection of Jewel Valley Road and Jewel Valley Way.</p> <p>The County appreciates the commenter's concerns about traffic safety at the intersection of Jewel Valley Road and Jewel Valley Way. Section 3.1.9, Transportation and Traffic, of the Draft EIR evaluates impacts to the existing transportation network that may result directly or indirectly from the proposed project. As required by PDF-TR-1, the Applicant is required by the County to develop a Traffic Control Plan (TCP) to provide safe and efficient traffic flow in the area and on the project site prior to and during construction. For ease of reference, PDF-TR-1 states:</p> <p><b>Traffic Control Plan.</b> Prior to obtaining a grading permit from the County of San Diego, the Applicant will implement a construction Traffic Control Plan (TCP) that includes the following measures:</p> <ol style="list-style-type: none"> <li>1. Temporary traffic control devices in accordance with the California Department of Transportation's (Caltrans) California Manual on Uniform Traffic Control Device to identify locations/sections where construction is ongoing. This may include slow-moving-vehicle warning signs, signage to warn of merging trucks, barriers for separating construction and non-construction traffic, use of traffic control flaggers, and any additional measures required for the sole convenience of safely passing non-construction traffic (including transit, bicyclists, and pedestrians) through and around construction areas.</li> <li>2. Coordination with Caltrans to secure the necessary encroachment and trip permits necessary for specialized haul trucks. Also, any excessive height/length vehicles should use pilot car services to provide safe over-the-road operations and overhead height warnings, if necessary.</li> <li>3. Notification of the California Highway Patrol, if necessary, to facilitate slowing freeway traffic to ensure safe access for motorists.</li> <li>4. Coordination with Caltrans, California Highway Patrol, and County officials, including the Sheriff's department. For the State Highway System, Caltrans requires a TCP to be submitted to District 11's Transportation Permits Issuance Branch at least 30 days prior to the start of any construction.</li> <li>5. Employment of a contract transport company that will be responsible for surveying the route to determine how turns on existing roads will be accomplished and ensuring that is reflected in the TCP.</li> <li>6. Establishment of procedures for coordinating with local emergency response agencies to ensure dissemination of information regarding emergency response vehicle routes affected by construction activities.</li> </ol> <p>The TCP would be prepared in consultation with the County and would contain project-specific measures to ensure motorist safety during project construction and operation, including notice, signage, policy guidelines, and the limitation of lane closures to off-peak hours. Additionally, as discussed in Section 3.1.9, Transportation and Traffic, project vehicle trips generated during construction would be temporary. During operations, the trips would be minimal as the project would be operated remotely. Cumulative energy projects in the area would also generate trips during construction that would be temporary and short-term. Therefore, potential impacts related to traffic have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
<p>15-6</p>	<p>The commenter requests that the project should prepare a traffic management plan which would include reduced speed limits along Jewel Valley Road, as well as a traffic guard at the Jewel Valley Road and Jewel Valley Way intersection. The commenter also requests that local residents should be notified of the project's construction schedule.</p> <p>See Response 15-5 above. Additionally, as required by PDF-TR-2 and PDF-TR-3, the project would ensure that property owners and others who may be affected during project construction would be notified to address potential conflicts that may arise between construction traffic and day-to-day traffic on local area roadways, ensuring the safe and efficient movement of traffic through the project area. For ease of reference, PDF-TR-2 states:</p> <p><b>PDF-TR-2: Preparation of Construction Notification Plan.</b> Forty-five days prior to construction or decommissioning activities, the Applicant will prepare and submit a construction notification plan to the appropriate land use jurisdiction agency for approval. The construction notification plan will identify the procedures that will be used to inform property owners of the location and duration of construction, identify approvals that will be needed prior to posting or publication of construction notices, and include text of proposed public notices and advertisements. The construction notification plan will address at a minimum the following components:</p>

Comment No.	Response
1.	<p><i>Public notice mailer.</i> A public notice mailer will be prepared and mailed no fewer than 15 days prior to construction. The notice will identify construction activities that will restrict, block, remove parking, or require a detour to access existing residential properties. The notice will state the type of construction activities that will be conducted and the location and duration of construction, including all helicopter activities. The Applicant or construction contractor will mail the notice to all residents or property owners within 1,000 feet of project components. If construction delays of more than 7 days occur, an additional notice will be prepared and distributed.</p>
2.	<p><i>Public liaison person and toll-free information hotline.</i> The Applicant will identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person will be included in notices distributed to the public. The Applicant will also establish a toll-free telephone number for receiving questions or complaints during construction and develop procedures for responding to callers. Procedures for handling and responding to calls will be addressed in the construction notification plan.</p>
	<p>Additionally, PDF-TR-3 states:</p> <p><b>PDF-TR-3: Notification of Property Owners and Provision of Access.</b> To facilitate access to properties that might be obstructed by construction or decommissioning activities, the Applicant will notify property owners and tenants at least 24 hours in advance of construction activities and will provide alternative access if required.</p> <p>Project design features PDF-TR-1, PDF-TR-2, and PDF-TR-3 will ensure the safe and efficient movement of traffic through the project area and proper notification to local residents/motorists of construction activities that could affect daily travel through the area. Regarding reduced speed limits, mitigation measure M-BI-6 (Biological Monitoring of Stormwater Pollution Prevention Plan Implementation) specifies that speed limits in and around all construction areas shall be enforced so that vehicles do not exceed 15 mph on unpaved roads and the right-of-way accessing the construction site, or 10 mph during the night. Regarding the commenter's traffic guard proposal, the Draft EIR sufficiently addresses intersection safety. Section 3.1.9, Transportation and Traffic, of the Draft EIR specifies that the project would be considered to have a significant impact related to transportation if it would substantially increase hazards due to a design feature, such as a dangerous intersection (see page 3.1.9-8 of the Draft EIR). The Draft EIR determined the significance of hazards related to transportation design based on the following factors:</p> <ul style="list-style-type: none"> <li>• Design features or physical configurations of an access road that may adversely affect the safe transport of vehicles along the roadway;</li> <li>• The percentage or magnitude of increased traffic on the road that would affect the safety of the roadway;</li> <li>• The physical conditions of the project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers that may result in vehicle conflicts with other vehicles or stationary objects;</li> <li>• Conformance of existing and proposed roads to the requirements of the private or public road standards, as applicable.</li> </ul> <p>The Draft EIR concluded that the project would not increase hazards along existing roadways, including Jewel Valley Road (see page 3.1.9-9 of the Draft EIR). The Draft EIR states:</p> <p>The project included a site access analysis which reviewed site access, project queues, and operational needs to determine if the project requires additional considerations to operate functionally. The three proposed new site access points include a minimum of 300 feet of unobstructed sight distance in both directions, in compliance with County standards. The operational analysis found that delays would be minimal at the site access locations and that turn lanes along Jewel Valley Road would not be needed. This is primarily due to the very low volumes on this section of Jewel Valley Road (see Appendix K.1).</p> <p>Here, the Draft EIR determined that impacts related to transportation, including dangerous intersections, would be less than significant with the adoption of project design features PDF-TR-1, PDF-TR-2, and PDF-TR-3. (see page 3.1.9-9 of the Draft EIR). As provided in State CEQA Guidelines Section 15126.4(a)(3), CEQA does not require mitigation for impacts determined to be less than significant. Therefore, CEQA does not require additional mitigation in the form of a traffic guard at the Jewel Valley Road and Jewel Valley Way intersection. Because potential impacts related to traffic have been adequately assessed in the Draft EIR, no revisions to the Draft EIR are required in response to this comment.</p>

Comment No.	Response
15-7	<p>This comment concludes the letter and urges decision makers to weigh benefits of the project against the potential impacts to the local community.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment. A copy of this comment letter will be included in the Final EIR, which will be provided to the Board of Supervisors for review when the project is considered for approval.</p>

**From:** Julita Rummler <litarummler@hotmail.com>  
**To:** "nicholas.koutoufidis1@sdcounty.ca.gov"  
<nicholas.koutoufidis1@sdcounty.ca.gov>  
**Subject:** [External] NO STARLIGHT SOLAR-protect Boulevard  
**Date:**

PLEASE, please, no starlight solar in Boulevard, CA, our home area.

I I6-1

Thank you.  
Julita Rummler

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**8.2.5.6      *Response to Comment Letter I6 from Julita Rummler  
(received September 4, 2025)***

Comment No.	Response
I6-1	<p>The commenter states their opposition to the proposed project.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment. A copy of this comment letter will be included in the Final EIR, which will be provided to the Board of Supervisors for review when the project is considered for approval.</p>

**From:** Mikayla Brennan <mikaylab11204@gmail.com>  
**To:** nicholas.koutoufidis1@sdcounty.ca.gov  
**Subject:** [External] Starlight Solar Project - Boulevard CA  
**Date:**

Dear Nicholas,

My name is Mikayla, and I've grown up in the Boulevard community. I went to high school out here and I love the scenic area that my parents chose to buy a house. The Starlight Solar Project would bury an overhead power line at Tule Jim Lane which would negatively impact the environment. This project includes a three hundred foot setbacks from all property lines and roads. It's also going to require native landscaping around the panel clusters. The visual impacts alone of this monstrous project are devastating. We moved out here to be away from the city, and the pollution. This project is decimating the natural flora and fauna. Let alone the damage this project will have on the water systems and aquifer. Everyone who lives in Boulevard and the surrounding areas relays on the ground water being safe to drink when it comes out of our wells and this project jeopardizes that. And with fire insurance already on the rise, this project will raise premiums even higher, pricing people out of their own homes. As well as the pollution and damage when the fires do happen. I strongly urge you to do whatever you can to stop or at least minimize this dangerous project.

I 17-1  
I 17-2  
I 17-3  
I 17-4  
I 17-5  
I 17-6  
I 17-7  
I 17-8  
I 17-9

Thank you for your time,  
Mikayla Brennan

### 8.2.5.7 Response to Comment Letter I7 from Mikayla Brennan (received September 6, 2025)

Comment No.	Response
I7-1	<p>The commenter introduces the letter and shares their personal connection to the community of Boulevard.</p> <p>Responses to the specific comments in the letter are provided below. A copy of this comment letter will be included in the Final EIR, which will be provided to the County Board of Supervisors for review when the project is considered for approval.</p>
I7-2	<p>The commenter states that the project would bury an overhead power line at Tule Jim Lane, which would negatively impact the environment.</p> <p>See Global Response GR-1, Visual Impacts. The County appreciates the commenter's concern regarding power line environmental impacts. According to the Draft EIR project description, the project would include an underground generation-tie (gen-tie) line located on the east side of Tule Jim Lane, which would connect into the southeastern corner of the San Diego Gas &amp; Electric (SDG&amp;E) Boulevard East Substation (see page 1-1 of the Draft EIR). Although the majority of the gen-tie line would be underground, 100 feet of the approximately 3,500-foot-long gen-tie would be above ground in order to cross Tule Jim Road.</p> <p>To the extent that the commenter is concerned about environmental impacts associated with burying the gen-tie line on the east side of Tule Jim Lane, the Draft EIR thoroughly evaluates the significant environmental impacts of the proposed project as described in Chapter 1.0, Project Description, Location, and Environmental Setting, including the undergrounding of the gen-tie line. The Draft EIR also specifies that undergrounding utilities is consistent with the San Diego County General Plan Conservation and Open Space Element COS-11.7 (County of San Diego 2011), which requires new development to place utilities underground and encourages undergrounding in existing development to maintain viewsheds, reduce hazards associated with hanging lines and utility poles, and to keep pace with current and future technologies (see page 3.1.6-33 of the Draft EIR).</p> <p>To the extent the commenter may be concerned about the overhead section of the gen-tie line at Tule Jim Road, the primary reason for an overhead section crossing is to avoid encroaching on an existing underground 138-kV transmission line in Tule Jim Lane that connects to the substation. Per Section 851 of the California Public Utilities Code, SDG&amp;E must obtain California Public Utilities Commission (CPUC) approval to ensure that a possible encroachment on their facilities or equipment is not adverse to public interest. The overhead section over the road eliminates the encroachment but not the requirement for SDG&amp;E to consult with the CPUC. Also, undergrounding the proposed gen-tie line at the Tule Jim Lane overcrossing would require a full road closure during project construction, which would severely limit access to the residences along Tule Jim Lane (traffic detours would not be feasible due to the lack of improved roads in the area). Further, the proposed gen-tie overcrossing would be visually consistent with the existing overhead power lines along Tule Jim Lane. CEQA does not require an EIR to consider alternatives that would improve a project's environmental baseline (see <i>In re Bay-Delta Programmatic Env't Impact Report</i> (2008) 43 Cal.4th 1143). Here, the issue is not the visual impact of overhead power lines, but whether the addition of a new overhead power line similar in form, line, color, and texture to existing overhead power lines will cause a significant new environmental impact.</p> <p>With respect to aesthetics, the Draft EIR provides an extensive analysis of potential impacts to aesthetic resources and states that no feasible mitigation measures have been identified to reduce the visual impacts of the project to a less-than-significant level (see Section 2.1, Aesthetics). As provided in State CEQA Guidelines Section 15091(a)(3), CEQA does not require the adoption of infeasible mitigation measures. Additionally, as provided in State CEQA Guidelines Section 15370, CEQA does not require the adoption of mitigation measures that would not avoid or substantially lessen significant environmental impacts. Here, the County has determined that no feasible mitigation measures would reduce visual impacts to a level that is less than significant. In order for an increased buffer distance to successfully avoid impacts, the buffer would have to be so large as to make implementation of the project infeasible. Any buffer distance that could be feasibly incorporated into the project design would not substantially lessen visual impacts. Additional information has been added to Section 2.1, Aesthetics, to further 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 (see pages 2.1-36 and 2.1-37). No additional changes to the Draft EIR were determined to be necessary in response to this comment. Here, the County has determined that no feasible mitigation measure, including increased buffer distance, would reduce visual impacts to a level that is less than significant. As the Draft EIR acknowledges the significant and unavoidable impact to visual resources and incorporates all feasible reduction measures, no revisions to the Draft EIR are required and a Statement of Overriding Considerations will be prepared. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I7-3	<p>The commenter states that the project includes 300-foot setbacks from all property lines and roads and would require native landscaping around the proposed solar panels.</p> <p>See Global Response GR-1, Visual Impacts. The project, as currently proposed, does not include a uniform 300-foot buffer between the proposed PV panels and adjacent properties and roads. Rather, the project</p>

Comment No.	Response
	<p>includes a minimum buffer of 30 feet, between the proposed project components and the boundaries of the project site. Further, as shown in Figure 1-3 in Chapter 1.0, Project Description, Location, and Environmental Setting, of the Draft EIR, the project boundaries do not fully encompass the entire footprint of the parcels in which the project is proposed, which greatly increases the buffer distances in some areas of the project site. For example, Area B would be located over 2,000 feet east of the adjacent parcel to the west, and Area E would be located over 200 feet west of the adjacent parcel to the east. Additionally, as shown in Figure 1-6 in Chapter 1.0, Project Description, Location, and Environmental Setting, of the Draft EIR, the project contains 15 cultural open space easement areas of various sizes within the project site, totaling 24.44 acres. No development or disturbance would occur within the open space easement areas. The open space easements along the edges of the site would increase the distance of the project components from the nearest adjacent parcels by between 120 feet and 500 feet in some areas, including the northwestern and southwestern edges of Area A-2, as well as the southwestern corner of Area A-1. Further, it should be noted that most existing residences in the surrounding vicinity are substantially set back from their own property lines, which increases the distance between existing residences and the proposed project components. With the exception of the residence located 150 feet west of the project site (northwest of Area A-2), all other residences would be over 400 feet away from the proposed photovoltaic (PV) panels.</p> <p>Regarding native plants, the project as currently proposed does not require the installation of native landscaping around all solar panels. Instead, the project would implement mitigation measure M-BI-8 (Prevention of Invasive Plant Species) to address the growth of invasive plant species within the panel areas. M-BI-8 specifies that a County of San Diego-approved plant list shall be used for areas immediately adjacent to open space. A hydroseed mix that incorporates native species, is appropriate to the area, and is free from invasive species shall be used for landscaped areas adjacent to open space areas. The Planning &amp; Development Services (PDS) landscape architect shall require that all final 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 (see page S-16 of the Draft EIR). The Draft EIR also implements project design feature PDF-AE-1, which specifies that the Applicant will coordinate with residents within a distance of 500 feet of a project solar panel installation to assess visibility impacts, including potential assistance for the installation of visual screening measures, which could include native landscaping (see page 2.1-36 of the Draft EIR).</p> <p>See Global Response GR-1, Visual Impacts. With respect to aesthetics, the Draft EIR provides an extensive analysis of potential impacts to aesthetic resources and states that no feasible mitigation measures have been identified to reduce the visual impacts of the project to a less than significant level (see Section 2.1, Aesthetics). As provided in State CEQA Guidelines Section 15091(a)(3), CEQA does not require the adoption of infeasible mitigation measures. Additionally, as provided in State CEQA Guidelines Section 15370, CEQA does not require the adoption of mitigation measures that would not avoid or substantially lessen significant environmental impacts. Here, the County has determined that no feasible mitigation measures would reduce visual impacts to a level that is less than significant. In order for an increased buffer distance to successfully avoid impacts, the buffer would have to be so large as to make implementation of the project infeasible. Any buffer distance that could be feasibly incorporated into the project design would not substantially lessen visual impacts. Additional information has been added to Section 2.1, Aesthetics, to further 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 (see pages 2.1-36 and 2.1-37). No additional changes to the Draft EIR were determined to be necessary in response to this comment. Here, the County has determined that no feasible mitigation measure, including increased buffer distance, would reduce visual impacts to a level that is less than significant. As the Draft EIR acknowledges the significant and unavoidable impact to visual resources and incorporates all feasible reduction measures, no revisions to the Draft EIR are required and a Statement of Overriding Considerations will be prepared. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>

Comment No.	Response
17-4	<p>The commenter states that the project would result in significant visual impacts.</p> <p>The County appreciates the commenter's concern regarding visual impacts. As discussed in the Draft EIR, the project would result in significant and unavoidable impacts to visual resources. Specifically, as detailed in Section 2.1, Aesthetics, the project would result in significant impacts related to Visual Character and Quality (Impact AE-1), Valued Visual Character and Image of Neighborhood or Community (Impact AE-2), and Focal and Panoramic Vistas (Impact AE-3). No feasible mitigation measures have been identified to reduce the visual impacts of the project to a less than significant level. As such, if the proposed project is approved, the County will prepare a Statement of Overriding Considerations, as required by CEQA Guidelines Section 15093.</p> <p>With respect to aesthetics, the Draft EIR provides an extensive analysis of potential impacts to aesthetic resources and states that no feasible mitigation measures have been identified to reduce the visual impacts of the Project to a less than significant level (see Section 2.1, Aesthetics). As provided in State CEQA Guidelines Section 15091(a)(3), CEQA does not require the adoption of infeasible mitigation measures. Additionally, as provided in State CEQA Guidelines Section 15370, CEQA does not require the adoption of mitigation measures that would not avoid or substantially lessen significant environmental impacts. Here, the County has determined that no feasible mitigation measures would reduce visual impacts to a level that is less than significant. In order for an increased buffer distance to successfully avoid impacts, the buffer would have to be so large as to make implementation of the project infeasible. Any buffer distance that could be feasibly incorporated into the project design would not substantially lessen visual impacts. Additional information has been added to Section 2.1, Aesthetics, to further 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 (see pages 2.1-36 and 2.1-37). No additional changes to the Draft EIR were determined to be necessary in response to this comment.</p>
17-5	<p>The commenter states that the project would result in permanent impacts to plants and wildlife.</p> <p>The County appreciates the commenter's concern regarding biological impacts. As discussed in Section 2.2, Biological Resources, of the Draft EIR, the project could have potentially significant impacts to biological resources. However, the project would implement the following mitigation measures, to minimize impacts to biological resource to the extent feasible: M-BI-1 (Biological Monitoring), M-BI-2 (Temporary Construction Fencing), M-BI-3 (Habitat Preservation), M-BI-4 (Resource Management Plan), M-BI-5 (Avian Breeding and Special-status Wildlife Impact Avoidance), M-BI-6 (Biological Monitoring of Stormwater Pollution Prevention Plan Implementation), M-BI-7 (Prevention of Chemical Pollutants), M-BI-8 (Prevention of Invasive Plant Species), M-BI-9 (Operations and Maintenance Signage), M-BI-10 (Noise Reduction), M-BI-11 (Mitigation Measures and Design Considerations for Jurisdictional Wetlands and Waterways), M-BI-12 (Wildlife Corridor), and M-BI-13 (Special-status Plants). As concluded in Section 2.2, Biological Resources, of the Draft EIR, implementation of these mitigation measures would reduce impacts to less than significant. As such, the Draft EIR and the Biological Resources Report (Appendix D to the Draft EIR) have sufficiently analyzed potential impacts to biological resources that satisfy County requirements. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
17-6	<p>The commenter states that the project would impact the local groundwater aquifer.</p> <p>See Global Response GR-3, Groundwater Impacts. The County appreciates the commenter's concern regarding impacts to groundwater. The project does not propose the use of any on-site wells and would therefore not result in drawdown of the local groundwater aquifer. Further, the project would not result in a significant increase in impervious surfaces or significantly alter the existing drainage pattern of the project site. As such, the project would not result in impacts related to groundwater recharge. The project would import nonpotable water for construction and fire suppression purposed from the and would implement a Groundwater Monitoring and Mitigation Plan (GMMP) for the Jacumba Community Services District (JCSD) groundwater wells which would ensure that the project would not result in significant impacts to the local groundwater aquifer. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>

Comment No.	Response
17-7	<p>The commenter states that the project would increase fire insurance rates for residents in the surrounding area.</p> <p>See Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice. Regarding fire insurance, CEQA states that economic effects such as insurance rates are not, by themselves, environmental impacts (State CEQA Guidelines Sections 15131 and 15382). While economic changes can sometimes be a factor in determining whether a physical change is significant, an increase in fire insurance costs does not trigger a physical environmental impact that must be reviewed. Absent substantial evidence of a reasonably foreseeable physical environmental change caused by the project (e.g., increased wildfire ignition or spread), potential changes to insurance pricing are not analyzed as significant effects. In this instance, the Draft EIR evaluates wildfire ignition/spread risk and has proposed mitigation measures (M-WF-1 through M-WF-6) that reduce ignition risk to less than significant, thereby addressing the underlying physical hazard.</p> <p>As of March 13, 2025, the CPUC now oversees maintenance/operations and verifies emergency response plans for battery facilities. Additionally, on October 6, 2025, Governor Gavin Newsom signed Senate Bill 283 which requires battery storage developers to engage with local fire authorities prior to submitting an application. This consultation must address facility design, assess potential risks and integrate emergency response plans. A facility will also be required to undergo a safety inspection by local fire officials before the facility can go online. These actions are separate and independent of CEQA, but relevant to the project's risk context. Nothing in this response affects or limits the authority of the California Department of Insurance to regulate insurance rates. Insurance availability and pricing are determined under separate state laws and regulatory frameworks.</p> <p>This response is provided for informational purposes and will be considered by the Board during the project approval process and will be made available through publication of this Final EIR; this comment does not warrant revisions to the Draft EIR.</p>
17-8	<p>The commenter expresses concern regarding the potential for the project to increase wildfire risk.</p> <p>See Global Response GR-5, Wildfire Risks. The County acknowledges the commenter's concern regarding wildfire risk. As discussed in Chapter 1.0, Project Description, Location, and Environmental Setting, the battery energy storage system (BESS) facilities included in the proposed project would use lithium iron phosphate batteries. Lithium iron phosphate batteries have higher thermal stability and a higher thermal runaway threshold than lithium manganese cobalt batteries. As a result, lithium iron phosphate batteries are inherently safer with a lower risk of thermal runaway as compared to lithium manganese cobalt or traditional lithium-ion batteries (Evro et al. 2024).</p> <p>As detailed in the Construction Fire Protection Plan (FPP), each battery storage cabinet would have a metal frame with insulation, air conditioning, and fire suppression, with separate enclosures for the electronic controls, inverters, and rectifiers. There would be a built-in heat detection and fire protection system and a fire extinguishing system. The heat and fire detection system would be linked to an automatic inert gas suppression system within each cabinet. The containers would also have an interior aerosol fire suppression system. The National Fire Protection Association (NFPA) has developed a new Standard for the Installation of Stationary Energy Storage Systems (NFPA 855). This standard addresses the design, construction, installation, commissioning, operation, maintenance, and decommissioning of stationary energy storage systems. The system would be designed in accordance with applicable NFPA safety standards. The BESS would be sited with a setback from off-site areas as a buffer against potential wildfire ignitions. The cabinets would not be walk-in containers; thus, the battery storage cabinets would be non-habitable structures per the state and local fire codes that are in place at the time a building permit application is submitted to the County.</p> <p>The Draft EIR concludes that, with the incorporation of M-WF-1 through M-WF-6, the project would not exacerbate the risk of fire ignition at the project site; therefore, environmental impacts were determined to be less than significant. Potential environmental impacts associated with wildfire have been adequately assessed in the Draft EIR, and no new significant environmental issues have been identified. State CEQA Guidelines Section 15088(a) does not require a response to comments that do not raise significant environmental issues. Therefore, no revisions to the Draft EIR are necessary.</p>
17-9	<p>This comment concludes the letter and requests that the proposed project should not be approved.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment. A copy of this comment letter will be included in the Final EIR, which will be provided to the Board of Supervisors for review when the project is considered for approval.</p>

**From:** Dan Grunow <dangrunow@gmail.com>  
**To:** nicholas.koutoufidis1@sdcounty.ca.gov  
**Subject:** [External] Comments on proposed starlight solar project in Boulevard  
**Date:**

Good afternoon Mr Koutoufidis,

I am writing in regard to the proposed starlight solar project in Boulevard. I was disappointed to hear of the project as well as several others that are being proposed. My concerns revolve around what removing these large swathes of native habitat will do to the sensitive wildlife such as burrowing owls and kangaroo mice. I am also concerned about how this project will affect our ground water quality as many of these projects utilize chemicals that are known carcinogens to reduce weed growth.

I 18-1  
I 18-2  
I 18-3

I understand that this project will likely be approved based on what we saw unfold with the solar project in our neighboring town of Jacumba. My requests would be for you to consider.

I 18-4

My request would be that the developer be required to provide ongoing independent well water testing for aquifer protection.

I 18-5

It would also be helpful to the wildlife if the developer was required to only disturb and remove the native plantings in the areas of the panels. Ideally there would be native landscaping completed upon completion of the project to shield the panels in brow corridors.

I 18-6

Thank you very much for your consideration in supporting our small community.

I 18-7

Dan Grunow  
858-405-3164  
39211 highway 94  
Boulevard CA 91905

### 8.2.5.8 **Response to Comment Letter I8 from Dan Grunow (received September 6, 2025)**

Comment No.	Response
I8-1	<p>This comment introduces the letter and expresses the commenter's opposition to the proposed project.</p> <p>Responses to the specific comments in the letter are provided below. A copy of this comment letter will be included in the Final EIR, which will be provided to the County Board of Supervisors for review when the project is considered for approval.</p>
I8-2	<p>The commenter expresses concern that the project would impact sensitive species including burrowing owls and kangaroo mice.</p> <p>The County appreciates the commenter's concern regarding biological impacts. According to range maps prepared by the California Department of Fish and Wildlife (CDFW), the project site is not within the typical range of burrowing owls (CDFW 2008) or kangaroo mice (CDFW 2007). Additionally, neither species was identified during any of the field surveys conducted by SWCA between 2022 and 2025. See Table 2.2-2 in Section 2.2, Biological Resources, of the Draft EIR for a summary of the field surveys conducted on-site. As to the project's potential impacts to other sensitive species, Section 2.2 addresses potential impacts resulting from project implementation on special-status species, riparian habitats and other sensitive natural communities, jurisdictional wetlands and waters, habitat connectivity and wildlife movement corridors, and consistency with applicable plans. The project would implement the following mitigation measures, to minimize impacts to biological resources to the extent feasible: M-BI-1 (Biological Monitoring), M-BI-2 (Temporary Construction Fencing), M-BI-3 (Habitat Preservation), M-BI-4 (Resource Management Plan), M-BI-5 (Avian Breeding and Special-status Wildlife Impact Avoidance), M-BI-6 (Biological Monitoring of Stormwater Pollution Prevention Plan Implementation), M-BI-7 (Prevention of Chemical Pollutants), M-BI-8 (Prevention of Invasive Plant Species), M-BI-9 (Operations and Maintenance Signage), M-BI-10 (Noise Reduction), M-BI-11 (Mitigation Measures and Design Considerations for Jurisdictional Wetlands and Waterways), M-BI-12 (Wildlife Corridor), and M-BI-13 (Special-status Plants). As concluded in the Draft EIR, implementation of these mitigation measures would reduce project impacts to biological resources to less than significant. Therefore, potential impacts related to sensitive species have been addressed in the Draft EIR and no revisions to the Draft EIR are required.</p>
I8-3	<p>The commenter expresses concern regarding the potential groundwater impacts related to the use of chemical herbicides.</p> <p>The County appreciates the commenter's concern regarding potential impacts due to chemical herbicides. Section 2.2, Biological Resources, of the Draft EIR addresses the prevention of chemical pollutants. Potential impacts related to chemical pollutants would be reduced through mitigation measure M-BI-7:</p> <p><b>M-BI-7: Prevention of Chemical Pollutants.</b> Weed control treatments shall include all legally permitted chemical, manual, and mechanical methods applied with the authorization of the County agriculture commissioner. The application of herbicides shall be in compliance with all federal and state laws and regulations under the prescription of a licensed Pest Control Adviser with at least 2 years of experience and implemented by a licensed applicator. Where manual and/or mechanical methods are used, disposal of the plant debris shall follow the regulations set by the County agriculture commissioner. The timing of the weed control treatment shall be determined for each plant species in consultation with the Pest Control Adviser, the County agriculture commissioner, and the California Invasive Plant Council, with the goal of controlling populations before they start producing seeds.</p> <p>During project construction, operation, and decommissioning, all areas that use chemicals that are potentially toxic or impactive to sensitive habitats or plants shall incorporate best management practices (e.g., avoid applications during or before rain events and avoid placing materials close to sensitive habitats) on-site to reduce impacts caused by the application and/or drainage of such materials within the development footprint. In addition, use of rodenticides and pesticides shall not be allowed.</p> <p><b>Documentation:</b> The permittee shall assume responsibility pursuant to this condition.</p> <p><b>Timing:</b> Upon establishment of use, the condition shall apply during the term of this permit for each phase.</p> <p><b>Monitoring:</b> The PDS is responsible for enforcement of this permit.</p> <p>Additionally, see Global Response GR-3, Groundwater Impacts. Potential impacts related to water quality and chemical pollutants have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
I8-4	<p>The commenter states that they believe the project will be approved based on similar solar projects.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment.</p>

Comment No.	Response
18-5	<p>The commenter requests that the project should implement groundwater well testing.</p> <p>See Global Response GR-3, Groundwater Impacts. The County disagrees with the commenter's assertion that additional mitigation related to hydrology and water quality is required. As provided in Section 2.4, Hydrology and Water Quality, of the Draft EIR, the project would adopt mitigation measure M-HY-1, which implements flood control measures to reduce impacts associated with flood hazards and risk of pollutant release to less than significant. With regard to direct impacts to groundwater resources, and as discussed throughout the Draft EIR, the project would not rely on the use of groundwater wells as a water source. Water for the project would be purchased from the Jacumba Community Services District (JCSD) and imported to the project site by water trucks. The Project Facility Availability Water Agreement between JCSD and the applicant, dated June 28, 2022, has been included as Appendix Q to the Final EIR. As required by PDF-HY-2, the project would implement a Groundwater Monitoring and Mitigation Plan (GMMP) for the JCSD wells. This project design feature would ensure that the project would not result in adverse impacts to the underground groundwater aquifers. For ease of reference, PDF-HY-2 states:</p> <p><b>Implementation of GMMP for JCSD.</b> To ensure nonpotable water purchased from the Jacumba Community Services District (JCSD) does not result in impacts to the aquifers accessed by JCSD's nonpotable water production wells (Highland Center Well and Park Well), the Starlight Solar Developer will implement the Groundwater Mitigation Monitoring and Mitigation Plan (GMMP) for the Flat Creek watershed.</p> <p>A groundwater monitoring report will be completed by a Professional Geologist or Professional Engineer licensed in the state of California and will be submitted to County Planning and Development Services (PDS) annually no later than 28 days following the end of the calendar year. Groundwater monitoring reports should be submitted for 5 years after proposed project construction has commenced. After 5 years, County PDS should determine if continuous reporting is required based on the effects of groundwater extraction from the previous 5 years. The annual reports will include the following information:</p> <ul style="list-style-type: none"> <li>• Groundwater-level hydrographs and tabulated groundwater-level data for each accessible well in the groundwater-monitoring network</li> <li>• Tabulated groundwater production volumes from JCSD nonpotable wells</li> <li>• Documentation of any changes in well pumping or groundwater well conditions for wells in the groundwater-monitoring network</li> <li>• Documentation of groundwater-dependent habitat monitoring, if necessary, as described in the GMMP</li> </ul> <p>If the baseline groundwater levels at the wells included in the groundwater monitoring network are exceeded by 5 feet, County PDS will be notified via letter and email within 1 working day of the exceedance, or immediately after the exceedance is recognized. Additionally, if groundwater-level thresholds at the off-site wells are exceeded by their respective thresholds, pumping of JCSD non-potable wells for the project will cease and County PDS will be notified via letter and email within 1 working day, or immediately after the exceedance is recognized.</p> <p>As stated above, the project would implement project design feature PDF-HY-2, which specifies that the County will determine if continuous groundwater monitoring and reporting is required based on the effects of groundwater extraction during the 5-year period after project construction has commenced. The County finds PDF-HY-2 sufficient to address groundwater monitoring requirements. As provided in California Public Resources Code (PRC) Section 21002, CEQA does not require the adoption of additional mitigation measures for impacts already mitigated to a level that is less than significant. As such, potential impacts related to groundwater have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
18-6	<p>The commenter requests that the project should retain the existing native vegetation to the extent possible, and that new native landscaping should be planted to visually shield the proposed solar panels.</p> <p>The County appreciates the commenter's concern regarding impacts to native plant species. Section 2.2, Biological Resources, of the Draft EIR addresses potential impacts resulting from project implementation on special-status species, riparian habitats and other sensitive natural communities, jurisdictional wetlands and waters, habitat connectivity and wildlife movement corridors, and consistency with applicable plans. The Draft EIR notes that significant impacts to Biological Resources will be reduced to less than significant with the adoption of proposed mitigation measures M-BI-1 through M-BI-13.</p> <p>As to visual impacts, see Global Response GR-1, Visual Impacts. The project, as currently proposed, would not include landscaping screening. As discussed in Section 2.1, Aesthetics, of the Draft EIR, installing landscaping around the entire project site for screening purposes would be infeasible, due to the high winds and arid conditions of the area. It would be highly unlikely that new vegetation would survive at a large enough scale (i.e., grow to maturity) to screen the entire project from nearby views. Therefore, the County disagrees with the commenters' assertion that landscape screening must be installed around the entire project site. However, as discussed in PDF-AE-1, the Applicant will coordinate with the resident of any existing private residence located within a distance of 500 feet of a project solar panel installation to assess possible remedies,</p>

Comment No.	Response
	<p>including financial assistance, for the installation of visual screening measures, including landscape screening. For ease of reference, PDF-AE-1 states:</p> <p style="padding-left: 40px;">The Applicant will coordinate with the resident of any existing (existing as of the date of this Major Use Permit Decision) private residence located within a distance of 500 feet of a project solar panel installation to assess visibility impact complaints made within 1 year from the initial operations date of the project. This assessment would include possible remedies that the Applicant may implement depending upon the level of visibility impacts occurring at the residence, including financial assistance for the installation of visual screening measures, such as landscaping or fencing. Requests for assistance can be made through a project hotline to be established by the Applicant and published on the Applicant's website.</p> <p>Therefore, through implementation of PDF-AE-1, some of the proposed project components would be screened from view. With respect to aesthetics, the Draft EIR provides an extensive analysis of potential impacts to aesthetic resources and states that no feasible mitigation measures have been identified to reduce the visual impacts of the Project to a less than significant level (see Section 2.1, Aesthetics). As provided in State CEQA Guidelines Section 15091(a)(3), CEQA does not require the adoption of infeasible mitigation measures. Additionally, as provided in State CEQA Guidelines Section 15370, CEQA does not require the adoption of mitigation measures that would not avoid or substantially lessen significant environmental impacts. Additional information has been added to Section 2.1, Aesthetics, to further 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 (see pages 2.1-36 and 2.1-37). Here, the County has determined that no feasible mitigation measure would reduce visual impacts to a level that is less than significant. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
18-7	<p>This comment concludes the letter.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment.</p>

**From:** Ken Kramer <kennipper2@gmail.com>

**To:** Nicholas.Koutoufidis1@sdcounty.ca.gov

**Subject:** [External] Starlight Solar Project Draft EIR Public Comment -  
Public Meeting

**Date:** Fri, 12 Sep 2025 16:25:01 -0700

**Attached Images:**



VINCE NICOLETTI  
DIRECTOR

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5510 OVERLAND DRIVE, SUITE 210, SAN DIEGO, CALIFORNIA 92123  
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(858) 565-5920 Building Services

STARLIGHT SOLAR PROJECT DRAFT EIR  
DRAFT EIR PUBLIC MEETING – AUGUST 7, 2025  
COMMENT SHEET

MY COMMENTS ARE ATTACHED -  
THANK YOU.  
→

Submit by Mail, Fax or Email. Comments must be received no later than September 15th, 2025 at 4:00 p.m.

Please submit comment to:

Nick Koutoufidis  
County of San Diego  
Planning and Development Services  
5510 Overland Ave., Suite 210  
San Diego, CA 92123  
Email: [Nicholas.Koutoufidis1@sdcounty.ca.gov](mailto:Nicholas.Koutoufidis1@sdcounty.ca.gov)

W.K.M. 9-12-25  
Commenter Signature, Date

KEN KRAMER  
Print Name

6245 FERNWOOD DRIVE  
Address

LA MESA, CA 91942  
City, State, Zip Code

19-1

My name is Ken Kramer. For nearly 50 years I have told stories on San Diego radio and television about the natural beauty and historical legacy of our county. The backcountry around Boulevard is an extraordinary source for those stories and a pristine treasure that we are all proud of.

I  
19-2  
I

I am a frequent and joyous visitor to my friends who live in this lovely area. To even imagine it marred with acres of solar panels is simply unthinkable.

I  
19-3  
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I understand the mandate San Diego County must meet to reduce greenhouse emissions. But in what universe do intelligent, thinking decision makers opt to place an industrial solar power generating complex in paradise?

I've tried to think about it from every angle. I really have. Are there not many times more acres of paved parking lots around arenas and stadiums in urban settings from one end of our county to the other that could be covered and outfitted with solar panels for a fraction of a fraction of the cost? Look at the expense of transporting generated power from far east county to where it will be used.

I  
19-4  
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Ultimately the solution is simple. Create rooftop solar generated mini grids within communities. Place battery storage facilities behind the corresponding neighborhood fire stations. Think ahead, think smart.

Instead, we're going to despoil a magnificent, pristine, rural, and irreplaceably precious part of our county? We're going to create light pollution in a dark-sky celestial wonderland? We're going to disrupt the quiet of nature by generating noise and electrical hum? We're going to string high-tension power lines across vast miles of our beautiful back country?

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19-5  
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19-6  
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19-7  
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What future stories will I be telling my listeners and viewers about this area? What is it...or what it was?

I  
19-8  
I

### 8.2.5.9 Response to Comment Letter I9 from Ken Kramer (received September 12, 2025)

Comment No.	Response
I9-1	<p>This comment introduces the letter regarding the proposed project.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment. A copy of this comment letter will be included in the Final EIR, which will be provided to the Board of Supervisors for review when the project is considered for approval.</p>
I9-2	<p>The commenter introduces themselves and shares their personal connection to the community of Boulevard.</p> <p>Responses to the specific comments in the letter are provided below. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I9-3	<p>The commenter expresses their opposition to the proposed project due to the potential visual impacts.</p> <p>See Global Response GR-1, Visual Impacts. With respect to aesthetics, the Draft EIR provides an extensive analysis of potential impacts to aesthetic resources and states that no feasible mitigation measures have been identified to reduce the visual impacts of the project to a less-than-significant level (see Section 2.1, Aesthetics). As provided in State CEQA Guidelines Section 15091(a)(3), CEQA does not require the adoption of infeasible mitigation measures. Additionally, as provided in State CEQA Guidelines Section 15370, CEQA does not require the adoption of mitigation measures that would not avoid or substantially lessen significant environmental impacts. Additional information has been added to Section 2.1, Aesthetics, to further 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 (see pages 2.1-36 and 2.1-37). Here, the County has determined that no feasible mitigation measure, including increased buffer distance, would reduce visual impacts to a level that is less than significant, and a Statement of Overriding Considerations will be prepared prior to approval of the project. No additional changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I9-4	<p>This comment states that the project is sited in an inappropriate location and suggests that the County focus on implementing rooftop solar rather than utility-scale solar facilities.</p> <p>As discussed in Chapter 4.0, Project Alternatives, of the Draft EIR, an alternative location for the project would not be feasible. State CEQA Guidelines Section 15126.6(f)(1) lists several factors that may be considered when addressing feasibility of alternatives (any alternative, not just alternative locations) and states that “No one of these factors establishes a fixed limit on the scope of reasonable alternatives.” Specifically, an alternative site need not be considered when implementation is “remote and speculative,” such as when the alternative site is beyond the control of a project applicant (<i>Goleta Union School District v. Regents of University of California 1995</i>). No other readily available undeveloped parcels of comparable size exist in the eastern part of the County that could accommodate the project. Other sites have either already been evaluated and deemed unsuitable for similar solar development, lack sufficient access, are too distant from existing infrastructure, or are not available for acquisition by the applicant within a reasonable timeframe. As such, a feasible alternative site was not identified.</p> <p>Additionally, as the project is being permitted through the County, the alternative site would have to be within the jurisdiction of the County, and not within an incorporated jurisdiction. Much of the existing urban and industrial areas within San Diego County are under the jurisdiction of an incorporated municipality, such as the City of San Diego. The County does not have jurisdictional control over alternative locations in incorporated jurisdictions, and as such, alternative locations within these areas cannot feasibly be implemented by the County.</p> <p>According to the County’s Regional Decarbonization Framework, rooftop solar, while an important option for achieving the County’s decarbonization goals, is typically more expensive per megawatt than utility-scale solar projects, and can often be difficult to implement:</p> <p style="padding-left: 40px;"><i>Most residential solar installations in the San Diego region are on single-family homes. Several challenges make it difficult to install solar technology on multifamily rental buildings. The building owner would have to pay for the installation but would not necessarily realize any benefit, and the tenants would benefit but they do not own the building or control operational decisions. In addition, if solar is installed it can be difficult to allocate the electric production to each tenant in a building.</i></p> <p>According to the San Diego County Regional Decarbonization Framework, both rooftop solar and utility-scale solar projects would need to be implemented in order to meet the energy demand of the region while relying on renewable resources. As shown in Table 2.5 of the Regional Decarbonization Framework Technical Report, relying solely on rooftop solar would result in a significant energy deficit (County of San Diego 2022). Therefore, the County would be unable to achieve their renewable energy goals without the use of utility-scale solar projects, such as the project. As such, rooftop solar would not be a feasible alternative to the project.</p>

Comment No.	Response
	<p>Furthermore, the basic purpose of an EIR's alternatives discussion is to determine if fundamental project objectives might be achieved at less environmental cost. Although alternatives need not implement all project objectives, an EIR is not required to include alternatives that are incompatible with the project's fundamental purpose (see <i>In re Bay-Delta Programmatic Evt'l Impact Report Coordinated Proceedings</i> (2008) 43 Cal.4th 1143, 1165). Here, as provided in Chapter 1.0, Project Description, Location, and Environmental Setting, the project's fundamental objective is to permit, construct, and operate utility-scale solar energy and battery storage as near as possible to existing San Diego Gas &amp; Electric (SDG&amp;E) transmission infrastructure in eastern San Diego County. Utility-scale solar and distributed solar projects, such as rooftop solar systems, fundamentally differ in size and in the location of their connection to the electrical grid. Here, the project's first objective is to develop a large, utility-scale system consisting of a 100-megawatt (MW) solar energy system and a 217 MW battery energy storage system (BESS) that is connected to SDG&amp;E's high-voltage transmission infrastructure. Distributed energy resources such as rooftop solar are smaller scale systems connected to the electrical grid at the distribution level (California Energy Commission 2025). Therefore, the commenters' proposed rooftop solar alternative would be incompatible with the Project's fundamental purpose, and the EIR is not required to evaluate the rooftop solar alternative. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
19-5	<p>The commenter states that the project would create nighttime light pollution.</p> <p>The County acknowledges the commenter's concern about potential light pollution. The proposed lighting fixtures would only be installed at the gated entrances around the perimeter of the project site and would consist of motion-activated low-pressure sodium bulbs. As discussed throughout the EIR, the lighting would be required to comply with the San Diego County Light Pollution Code, also known as the Dark Sky Ordinance. As stated in Chapter 1.0, Project Description, Location, and Environmental Setting:</p> <p style="padding-left: 40px;">All lighting would have bulbs that do not exceed 100 watts or equivalent, and all lights would be shielded, directed downward, and would comply with the County Light Pollution Code (County Code Sections 51.201–51.209), also known as the Dark Sky Ordinance. Outdoor lighting circuits would incorporate dusk-to-dawn photocell controllers, occupancy sensors, and/or switches as appropriate. Additionally, lighting for the project would be designed in accordance with the County Zoning Ordinance, Sections 6320, 6322, and 6324, which guide performance standards for glare, and controls excessive or unnecessary outdoor light emissions (County of San Diego 2012).</p> <p>As concluded in Section 2.1, Aesthetics, the proposed project would not result in any significant impacts related to lighting. Any impacts to nighttime light pollution would be minimized as the lighting fixtures would be motion-activated and would adhere to the lighting requirements in the County Zoning Code. Therefore, potential impacts related to lighting have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
19-6	<p>The commenter expresses concern regarding the noise impacts of the proposed project.</p> <p>The County acknowledges the commenter's concern regarding potential noise impacts. As provided in Section 2.5, Noise, and the Noise Analysis Report prepared for the proposed project (Appendix J.1), a noise measurement survey of the existing ambient noise environment consisting of a series of sound level measurements was conducted at nine locations in the project area on June 8, 2022 (see Figure 2.5-1). The measured sound levels in the project area ranged from approximately 30 A-weighted decibels (dBA) continuous sound level (Leq) to 43 dBA Leq (see Table 2.5-2). Based on the modeling results, noise levels at the project boundary would range up to 37 dBA Leq at the property line corner closest to the BESS area. Therefore, noise levels would comply with County Noise Ordinance Section 36.404 and would not exceed the "rural noise standards" of 50 dBA from 7:00 a.m. to 10 p.m. and 45 dBA from 10:00 p.m. to 7:00 a.m. As shown on Figure 1-13 in Chapter 1.0, Project Description, Location, and Environmental Setting, with the exception of the Tule Wind Groundwater Permitting Project, all of the past, present, and reasonably anticipated future projects in the project area would be several miles away from the project site. Due to the attenuation of noise over large distances, it would not be expected that the noise generated during operation of the project would contribute to any cumulative noise impacts. Furthermore, the Draft EIR adopts mitigation measures M-N-1 and M-N-2 to reduce impacts associated with operational and construction-related noise to less than significant. Therefore, potential impacts related to noise have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
19-7	<p>The commenter expresses concern regarding the implementation of miles of new power lines throughout the local community.</p> <p>See Global Response GR-1 Visual Impacts. The proposed gen-tie line connecting the proposed project to the SDG&amp;E Boulevard Substation would only be 3,500 feet (0.67 miles) in length and located primarily underground. Further, the proposed gen-tie overcrossing would be visually consistent with the existing overhead power lines along Tule Jim Lane and would not result in a significant new visual impact. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
19-8	<p>The commenter expresses concern regarding the changes to the character of the community as a result of building the proposed project.</p>

Comment No.	Response
	<p>See Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice. Comments related to social and economic issues do not specifically relate to the environmental analysis included in the Draft EIR. This response is provided for informational purposes and will be considered by the Board during the project approval process and will be made available through publication of this Final EIR. These comments do not warrant revisions to the Draft EIR. As discussed in the Draft EIR, the project would result in significant and unavoidable impacts to visual resources. Specifically, as detailed in Section 2.1, Aesthetics, the project would result in significant impacts related to Visual Character and Quality (Impact AE-1), Valued Visual Character and Image of Neighborhood or Community (Impact AE-2), and Focal and Panoramic Vistas (Impact AE-3). No feasible mitigation measures have been identified to reduce the visual impacts of the project to a less than significant level. As such, if the proposed project is approved, the County will prepare a Statement of Overriding Considerations, as required by CEQA Guidelines Section 15093. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>

**From:** Miles Maeda <milesmaeda@gmail.com>  
**To:** Nicholas.Koutoufidis1@sdcounty.ca.gov  
**Subject:** [External] Starlight Solar Project Must Be Reduced  
**Date:** Sun, 14 Sep 2025 08:57:37 -0700

Dear Supervisor Koutoufidis,

I write to you as a concerned resident of Boulevard deeply worried about the proposed Starlight Solar Project. While I support clean energy, this project as currently proposed poses serious threats to our land, water, safety, and rural way of life. I urge you to insist on significant modifications. Or in the absence of those, reject or greatly reduce the project. Below are the issues I see must be addressed.

I10-1

1. Project needs to be 300 feet away from all property lines & roads  
The proposed solar arrays, battery storage, access roads, fencing, and all supporting infrastructure must be set back at least 300 feet from property lines of private homes and from public roads. This buffer is critical to protect neighbors from noise, glare, visual intrusion, health risks, and risk in case of fire or other emergencies.

I10-2

2. All overhead power lines at Tule Jim Lane need to be buried  
The project proposals admit that there will be one overhead crossing of power lines at Tule Jim Lane. That crossing poses visual, safety, and wildfire risk. All transmission / gen-tie lines in that area, especially crossing Tule Jim Lane, should be buried underground. Overhead wires are more exposed to wind, fire, and pose a hazard; they should not cut through rural landscape with roadways and homes.

I10-3

3. Necessity of native landscaping around panel clusters  
Around all solar panel clusters, infrastructure pads (inverters, transformers, battery storage), fencing, and equipment, there needs to be landscaping composed of native plant species. This should act as visual screening, help soil stability, support biodiversity, reduce dust, and maintain the rural character. Non-native or invasive species absolutely need to be avoided. Also, the landscaping should be well maintained over time, with clear enforceable standards.

I10-4

4. Require independent well testing & ongoing monitoring  
The project will draw on groundwater and has potential to disrupt aquifers, affect neighboring wells, and degrade water quality. Before

I10-5

construction begins, independent baseline testing of wells in surrounding properties must be done (including quantity, depth, water levels, and water quality). Then there must be ongoing monitoring for impacts (e.g. depletion, contamination). There should be legally binding remediation protocols in case harm is found.

5. Threat of fire risks from large-scale batteries & panels

The Battery Energy Storage System (BESS) of ~217.4 MW proposed is large, and battery failures can lead to intense fires, which are hard to extinguish. Solar arrays and infrastructure can also act as ignition sources or increase fuel continuity. Given that much of this acreage is in a Very High Fire Hazard Severity Zone (as CEQA acknowledges), the fire risk is real and serious. The design must include robust fire prevention, mitigation, emergency response plans, and ensure that local fire departments have adequate capacity and access. Without those, the project is a grave danger to lives, property, wildlife, and ecosystem.

6. Project must be reduced due to its visual impact

Even with proposed mitigation, the sheer scale—hundreds of acres, 235,000+ PV modules up to 12 feet tall, large battery storage infrastructure, access roads, fencing, lighting, etc.—make it impossible to hide the visual damage. The rural vistas, openness, dark skies, natural tones of our land will be altered permanently. Because these impacts are substantial and cannot be fully mitigated, the only responsible path is to reduce the project's footprint: fewer acres, lower height, less battery capacity, less visual mass. A toned-down version may still serve energy goals without sacrificing the character of Boulevard and the health of its land and people.

Why all of this matters:

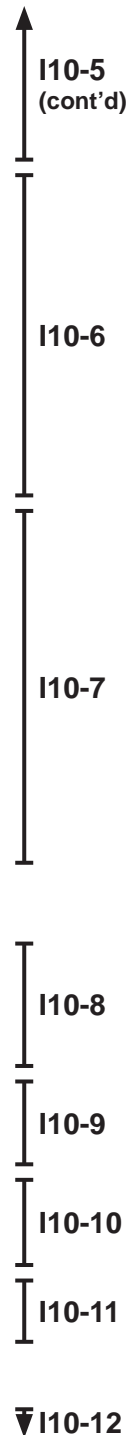
\* Our wells and surface water are precious and fragile. Damage to aquifers means loss of drinking water or major costs to repair or adapt.

\* Our rural character is not just aesthetic, it's tied to our way of life, our identity, our property values, mental health, quality of life. Once lost, it doesn't come back.

\* Fire risk in San Diego County is not hypothetical. We cannot add thousands of high-voltage, flammable components without fully assuming the burden.

\* Visual intrusion, noise, glare, traffic, dust... these aren't just nuisances; over time, they degrade health, well-being, peace, safety.

Conclusion:



I urge you, as County Supervisors, to use your authority to demand these strong protections. Please insist on:

- \* 300 ft setbacks from all property lines & roads
- \* Burial of overhead power / gen-tie lines, especially at Tule Jim Lane
- \* Native landscaping screening of all solar / battery / support infrastructure
- \* Independent, baseline and ongoing well testing & monitoring
- \* Comprehensive fire safety design, mitigation, and emergency capacity
- \* A significantly scaled-down version of the project so that the remaining visual, environmental, and safety impacts are truly acceptable to our community

I10-12  
(cont'd)

Thank you for your attention and service. I trust you will listen to the residents of Boulevard, weigh the long-term impacts, and protect our land, water, and rural character while still advancing renewable energy in the ways that are safe, responsible, and community-guided.

I10-13

Sincerely,  
Miles Maeda  
Boulevard, CA

### 8.2.5.10 Response to Comment Letter I10 from Miles Maeda (received September 14, 2025)

Comment No.	Response
I10-1	<p>The commenter introduces the letter and expresses their opposition to the proposed project. The commenter goes on to state that while they support clean energy, they believe that the proposed project would result in significant impacts to the local community. The commenter requests that the project be modified or rejected.</p> <p>The commenter states that the project as proposed poses serious threats to land, water, and safety, but the commenter does not provide specific detail regarding these threats in this introductory section of the comment letter. Regarding the commenter's assertion that the project should be significantly modified or rejected, Chapter 4.0, Project Alternatives, of the Draft EIR provides an extensive analysis of a range of alternatives to the proposed project, including a No Project Alternative (see page 4-1 of the Draft EIR). No changes to the EIR were determined to be necessary in response to this comment. A copy of this comment letter will be included in the Final EIR, which will be provided to the Board of Supervisors for review when the project is considered for approval. Responses to the specific comments in the letter are provided below.</p>
I10-2	<p>The commenter requests that the project should implement a 300-foot buffer from all property lines and roads. See Global Response GR-1 Visual Impacts. The County acknowledges the commenter's concern regarding potential visual impacts. The project, as currently proposed, does not include a uniform 300-foot buffer between the proposed photovoltaic (PV) panels and adjacent properties and roads. Rather, the project includes a minimum buffer of 30 feet, between the proposed project components and the boundaries of the project site. Further, as shown in Figure 1-3 in Chapter 1.0, Project Description, Location, and Environmental Setting, of the Draft EIR, the project boundaries do not fully encompass the entire footprint of the parcels in which the project is proposed, which greatly increases the buffer distances in some areas of the project site. For example, Area B would be located over 2,000 feet east of the adjacent parcel to the west, and Area E would be located over 200 feet west of the adjacent parcel to the east. Additionally, as shown in Figure 1-6 in Chapter 1.0, Project Description, Location, and Environmental Setting, of the Draft EIR, the project contains 15 cultural open space easement areas of various sizes within the project site, totaling 24.44 acres. No development or disturbance would occur within the open space easement areas. The open space easements along the edges of the site would increase the distance of the project components from the nearest adjacent parcels by between 120 feet and 500 feet in some areas, including the northwestern and southwestern edges of Area A-2, as well as the southwestern corner of Area A-1. Further, it should be noted that most existing residences in the surrounding vicinity are substantially set back from their own property lines, which increases the distance between existing residences and the proposed project components. With the exception of the residence located 150 feet west of the project site (northwest of Area A-2), all other residences would be over 400 feet away from the proposed PV panels. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I10-3	<p>The commenter requests that the project should underground the proposed power lines crossing Tule Jim Lane.</p> <p>See Global Response GR-1 Visual Impacts. The County appreciates the commenter's concern regarding the undergrounding of the gen-tie line. The project, as currently proposed, would not underground the entire proposed gen-tie line; however, only 100 feet of the approximately 3,500-foot-long gen-tie would be above ground. The primary reason for an overhead section crossing Tule Jim Lane is to avoid encroaching on an existing underground 138-kV transmission line in Tule Jim Lane that connects to the substation. Per Section 851 of the California Public Utilities Code, San Diego Gas &amp; Electric (SDG&amp;E) must obtain California Public Utilities Commission (CPUC) approval to ensure that a possible encroachment on their facilities or equipment is not adverse to public interest. The overhead section over the road eliminates the encroachment but not the requirement for SDG&amp;E to consult with the CPUC. Also, undergrounding the proposed gen-tie line at the Tule Jim Lane overcrossing would require a full road closure during project construction, which would severely limit access to the residences along Tule Jim Lane (traffic detours would not be feasible due to the lack of improved roads in the area). Further, the proposed gen-tie overcrossing would be visually consistent with the existing overhead power lines along Tule Jim Lane. CEQA does not require an EIR to consider alternatives that would improve a project's environmental baseline (see <i>In re Bay-Delta Programmatic Env't Impact Report</i> (2008) 43 Cal.4th 1143). Here, the issue is not the visual impact of overhead power lines, but whether the addition of a new overhead power line similar in form, line, color, and texture to existing overhead power lines will cause a significant new environmental impact. Therefore, the County disagrees with the commenters' assertion that undergrounding the gen-tie line at the Tule Jim Lane crossing is required because the overhead the gen-tie line would not introduce a new visual element to the area surrounding Tule Jim Lane, and it would not result in a significant new visual impact. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I10-4	<p>The commenter requests that the project should include native landscaping to visually screen the project components.</p>

Comment No.	Response
	<p>See Global Response GR-1 Visual Impacts. The County acknowledges the commenter’s concern regarding visual impacts and native landscaping. The project, as currently proposed, would not include landscaping screening. As discussed in Section 2.1, Aesthetics, of the Draft EIR, installing landscaping around the entire project site for screening purposes would be infeasible, due to the high winds and arid conditions of the area. It would be highly unlikely that new vegetation would survive at a large enough scale (i.e., grow to maturity) to screen the entire project from nearby views. Therefore, the County disagrees with the commenters’ assertion that landscape screening must be installed around the entire project site. However, as discussed in PDF-AE-1, the Applicant will coordinate with the resident of any existing private residence located within a distance of 500 feet of a project solar panel installation to assess possible remedies, including financial assistance, for the installation of visual screening measures, including landscape screening. For ease of reference, PDF-AE-1 states:</p> <p style="padding-left: 40px;">The Applicant will coordinate with the resident of any existing (existing as of the date of this Major Use Permit Decision) private residence located within a distance of 500 feet of a project solar panel installation to assess visibility impact complaints made within 1 year from the initial operations date of the project. This assessment would include possible remedies that the Applicant may implement depending upon the level of visibility impacts occurring at the residence, including financial assistance for the installation of visual screening measures, such as landscaping or fencing. Requests for assistance can be made through a project hotline to be established by the Applicant and published on the Applicant’s website.</p> <p>Therefore, through implementation of PDF-AE-1, some of the proposed project components would be screened from view. With respect to aesthetics, the Draft EIR provides an extensive analysis of potential impacts to aesthetic resources and states that no feasible mitigation measures have been identified to reduce the visual impacts of the Project to a less than significant level (see Section 2.1, Aesthetics). As provided in State CEQA Guidelines Section 15091(a)(3), CEQA does not require the adoption of infeasible mitigation measures. Additionally, as provided in State CEQA Guidelines Section 15370, CEQA does not require the adoption of mitigation measures that would not avoid or substantially lessen significant environmental impacts. Additional information has been added to Section 2.1, Aesthetics, to further 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 (see pages 2.1-36 and 2.1-37). Here, the County has determined that no feasible mitigation measure would reduce visual impacts to a level that is less than significant, and a Statement of Overriding Considerations will be prepared prior to approval of the project. As to the commenter’s concern regarding invasive plant species, mitigation measure M-BI-8 (Prevention of Invasive Plant Species) addresses the prevention of invasive plant species for landscaped areas adjacent to the biological open space. No additional changes to the Draft EIR were determined to be necessary in response to this comment.</p>
110-5	<p>The commenter requests that the project implement ongoing testing and monitoring of the groundwater wells surrounding the project site.</p> <p>See Global Response GR-3, Groundwater Impacts. The County disagrees with the commenter’s assertion that additional mitigation related to hydrology and water quality is required. As provided in Section 2.4, Hydrology and Water Quality, the project would adopt mitigation measure M-HY-1, which implements flood control measures to reduce impacts associated with flood hazards and risk of pollutant release to less than significant. With regard to direct impacts to groundwater resources, and as discussed throughout the Draft EIR, the project would not rely on the use of groundwater wells as a water source. Water for the project would be purchased from the Jacumba Community Services District (JCSD) and imported to the project site by water trucks. The Project Facility Availability Water Agreement between JCSD and the applicant, dated June 28, 2022, has been included as Appendix Q to the Final EIR. As required by PDF-HY-2, the project would implement a Groundwater Mitigation Monitoring and Mitigation Plan for the JCSD wells. This project design feature would ensure that the project would not result in adverse impacts to the underground groundwater aquifers. For ease of reference, PDF-HY-2 states:</p> <p style="padding-left: 40px;"><b>Implementation of GMMP for JCSD.</b> To ensure nonpotable water purchased from the Jacumba Community Services District (JCSD) does not result in impacts to the aquifers accessed by JCSD’s nonpotable water production wells (Highland Center Well and Park Well), the Starlight Solar Developer will implement the Groundwater Mitigation Monitoring and Mitigation Plan (GMMP) for the Flat Creek watershed.</p> <p>A groundwater monitoring report will be completed by a Professional Geologist or Professional Engineer licensed in the state of California and will be submitted to County Planning and Development Services (PDS) annually no later than 28 days following the end of the calendar year. Groundwater monitoring reports should be submitted for 5 years after proposed project construction has commenced. After 5 years, County PDS should determine if continuous reporting is required based on the effects of groundwater extraction from the previous 5 years. The annual reports will include the following information:</p> <ul style="list-style-type: none"> <li>• Groundwater-level hydrographs and tabulated groundwater-level data for each accessible well in the groundwater-monitoring network</li> <li>• Tabulated groundwater production volumes from JCSD nonpotable wells</li> </ul>

Comment No.	Response
	<ul style="list-style-type: none"> <li>• Documentation of any changes in well pumping or groundwater well conditions for wells in the groundwater-monitoring network</li> <li>• Documentation of groundwater-dependent habitat monitoring, if necessary, as described in the GMMP</li> </ul> <p>If the baseline groundwater levels at the wells included in the groundwater monitoring network are exceeded by 5 feet, County PDS will be notified via letter and email within 1 working day of the exceedance, or immediately after the exceedance is recognized. Additionally, if groundwater-level thresholds at the off-site wells are exceeded by their respective thresholds, pumping of JCSD non-potable wells for the project will cease and County PDS will be notified via letter and email within 1 working day, or immediately after the exceedance is recognized.</p> <p>As stated above, the project would implement project design feature PDF-HY-2, which specifies that the County will determine if continuous groundwater monitoring and reporting is required based on the effects of groundwater extraction during the 5-year period after project construction has commenced. The County finds PDF-HY-2 sufficient to address groundwater monitoring requirements. As provided in California Public Resources Code (PRC) Section 21002, CEQA does not require the adoption of additional mitigation measures for impacts already mitigated to a level that is less than significant. As such, potential impacts related to groundwater have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
110-6	<p>The commenter expresses concern that the introduction of a new energy storage facility would increase wildfire risk due to the potential for fire caused by battery failure at the project site. The commenter requests that the project should include mitigation measures for fire prevention, prepare an emergency response plan, and ensure adequate emergency access to the project site.</p> <p>See Global Response GR-5, Wildfire Risks. The County appreciates the commenter’s concern related to fire risk. As discussed in Chapter 1.0, Project Description, Location, and Environmental Setting, the BESS facilities included in the proposed project would use lithium iron phosphate batteries. Lithium iron phosphate batteries have higher thermal stability and a higher thermal runaway threshold than lithium manganese cobalt batteries. As a result, lithium iron phosphate batteries are inherently safer with a lower risk of thermal runaway as compared to lithium manganese cobalt or traditional lithium-ion batteries (Evro et al. 2024).</p> <p>As detailed in the Construction Fire Protection Plan (FPP), each battery storage cabinet would have a metal frame with insulation, air conditioning, and fire suppression, with separate enclosures for the electronic controls, inverters, and rectifiers. There would be a built-in heat detection and fire protection system and a fire extinguishing system. The heat and fire detection system would be linked to an automatic inert gas suppression system within each cabinet. The containers would also have an interior aerosol fire suppression system. The National Fire Protection Association (NFPA) has developed a new Standard for the Installation of Stationary Energy Storage Systems (NFPA 855). This standard addresses the design, construction, installation, commissioning, operation, maintenance, and decommissioning of stationary energy storage systems. The system would be designed in accordance with applicable NFPA safety standards. The BESS would be sited with a setback from off-site areas as a buffer against potential wildfire ignitions. The cabinets would not be walk-in containers; thus, the battery storage cabinets would be non-habitable structures per the state and local fire codes that are in place at the time a building permit application is submitted to the County.</p> <p>The Draft EIR concludes that, with the incorporation of M-WF-1 through M-WF-6, the project would not exacerbate the risk of fire ignition at the project site; therefore, environmental impacts were determined to be less than significant. M-WF-1 requires the implementation of numerous risk reduction measures to ensure adequate fire mitigation, internal project site access, and safety during construction, operation, and decommissioning activities. M-WF-2 would require the implementation and maintenance of fuel modification zones (FMZs), which would reduce wildfire risks during project operations. M-WF-3 requires the incorporation of safety measures that would reduce fire risk at the BESS and would reduce the spread potential from a fire starting in the BESS. M-WF-4 requires the implementation of a Construction Fire Protection Plan, which would reduce wildfire ignition risk during construction and decommissioning activities. M-WF-5 outlines precautions during elevated weather conditions to minimize the potential of uncontrolled spread of a wildfire. Lastly, M-WF-6 requires the Applicant to enter into a Fire Protection and Mitigation Agreement with the San Diego County Fire Protection District (SDCFPD) to make a fair share contribution toward local emergency response capabilities (see Appendix P). These measures are consistent with the recommendations of the comprehensive FPP and applicable fire codes (see Appendix L). The FPP provides fire behavior modeling for on-site and off-site fuels, including under worst-case-scenario conditions. The results from the modeling would provide guidance for design and measures to lessen the threat of and hazards from ignitions and wildfires, including specifically during construction activities. Potential environmental impacts associated with wildfire have been adequately assessed in the Draft EIR, and no new significant environmental issues have been identified. Therefore, no revisions to the Draft EIR are necessary.</p>
110-7	<p>The commenter states that the proposed project would result in significant visual impacts related to scenic vistas and dark skies.</p> <p>The County acknowledges the commenter’s concern related to visual impacts and dark skies. See Global Response GR-1, Visual Impacts. With respect to aesthetics, the Draft EIR provides an extensive analysis of potential impacts to aesthetic resources and states that no feasible mitigation measures have been identified</p>

Comment No.	Response
	<p>to reduce the visual impacts of the project to a less-than-significant level (see Section 2.1, Aesthetics). CEQA does not require the adoption of infeasible mitigation measures or mitigation measures that would not avoid or lessen significant environmental impacts. Here, the County has determined that no feasible mitigation measure, including increased buffer distance, would reduce visual impacts to a level that is less than significant. Additional detail regarding the infeasibility of potential mitigation measures for visual resources has been added to Section 2.1 Aesthetics, of the Final EIR (see revisions to page 2.1-36 and Table 8-2).</p> <p>Regarding lighting, the proposed lighting fixtures would only be installed at the gated entrances around the perimeter of the project site and would consist of motion-activated low-pressure sodium bulbs. As discussed throughout the EIR, the lighting would be required to comply with the San Diego County Light Pollution Code, also known as the Dark Sky Ordinance. As stated in Chapter 1.0, Project Description, Location, and Environmental Setting:</p> <p style="padding-left: 40px;">All lighting would have bulbs that do not exceed 100 watts or equivalent, and all lights would be shielded, directed downward, and would comply with the County Light Pollution Code (County Code Sections 51.201–51.209), also known as the Dark Sky Ordinance. Outdoor lighting circuits would incorporate dusk-to-dawn photocell controllers, occupancy sensors, and/or switches as appropriate. Additionally, lighting for the project would be designed in accordance with the County Zoning Ordinance, Sections 6320, 6322, and 6324, which guide performance standards for glare, and controls excessive or unnecessary outdoor light emissions (County of San Diego 2012).</p> <p>As concluded in Section 2.1, Aesthetics, the proposed project would not result in any significant impacts related to lighting. Any impacts to nighttime light pollution would be minimized as the lighting fixtures would be motion-activated and would adhere to the lighting requirements in the County Zoning Code. Therefore, potential impacts related to lighting have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
110-8	<p>The commenter states that the project would result in impacts to the local underground aquifers which would affect local groundwater supplies.</p> <p>See Global Response GR-3, Groundwater Impacts. The project does not propose the use of any on-site wells and would therefore not result in drawdown of the local groundwater aquifer. Further, the project would not result in a significant increase in impervious surfaces or significantly alter the existing drainage pattern of the project site. As such, the project would not result in impacts related to groundwater recharge. The project would import nonpotable water for construction and fire suppression purposed from the JCSD, and it would implement a Groundwater Monitoring and Mitigation Plan (GMMP) for the JCSD groundwater wells which would ensure that the project would not result in significant impacts to the local groundwater aquifer. No changes to the EIR were determined to be necessary in response to this comment.</p>
110-9	<p>The commenter states that the project may impact rural character, which could impact aesthetics and decrease property values, mental health, and quality of life.</p> <p>See Response I9-7 above. Additionally, see Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice. Comments related to social and economic issues, such as decreases in property value, do not specifically relate to the environmental analysis included in the Draft EIR. This response is provided for informational purposes and will be considered by the Board during the project approval process and will be made available through publication of this Final EIR. These comments do not warrant revisions to the Draft EIR. As discussed in the Draft EIR, the project would result in significant and unavoidable impacts to visual resources. Specifically, as detailed in Section 2.1, Aesthetics, the project would result in significant impacts related to Visual Character and Quality (Impact AE-1), Valued Visual Character and Image of Neighborhood or Community (Impact AE-2), and Focal and Panoramic Vistas (Impact AE-3). No feasible mitigation measures have been identified to reduce the visual impacts of the project to a less than significant level. As such, if the proposed project is approved, the County will prepare a Statement of Overriding Considerations, as required by CEQA Guidelines Section 15093. No changes to the Draft EIR were determined to be necessary in response to this comment.</p> <p>To the extent the commenter is concerned about mental health and quality of life risks related to other environmental impacts, the County finds that the Draft EIR adequately addresses all significant environmental impacts related to the project. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
110-10	<p>The commenter states that the project would increase potential wildfire risks.</p> <p>See Global Response GR-5, Wildfire Risks, and I9-6 above. Additionally, the draft EIR includes mitigation measure M-WF-6 which requires the Applicant to enter into a Fire Protection and Mitigation Agreement with the SDCFPD to make a fair share contribution toward local emergency response capabilities (see Appendix P):</p> <p><b>M-WF-6: Fire Protection and Mitigation Agreement.</b> As a condition to providing service and pursuant to the Safety Element of the General Plan, the Applicant shall enter into a Fire Protection and Mitigation Agreement with the San Diego County Fire Protection District (SDCFPD) prior to approval of a Major Use Permit to make a fair share contribution toward local emergency response capabilities. The funding shall be used by the SDCFPD to mitigate risks of wildfires and to enhance</p>

Comment No.	Response
	<p>fire suppression and emergency services capabilities for the proposed project and the southeast portion of CSA 135.</p> <p>Furthermore, there is one fire station within a 5-minute drive time, two stations within a 10-minute drive time, and an additional station within a 15-minute drive time, providing adequate firefighting capabilities. During construction and decommissioning of the project, there would be personnel on-site and a potential increase in demand for emergency services. However, any increase in the regional population associated with project construction or decommissioning activities would be temporary and minimal. Additionally, as part of PDF-TR-1 (Traffic Control Plan), the Applicant will establish procedures for coordinating with local emergency response agencies to ensure the dissemination of information regarding emergency response vehicle routes affected by construction and decommissioning activities. This would ensure that worker trips would not result in inadequate emergency access during construction or decommissioning. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I10-11	<p>The commenter states that the environmental impacts of the project would affect the health and quality of life of local community members.</p> <p>See Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice. Potential environmental impacts of the project related to public health and the surrounding community are analyzed throughout the Draft EIR, specifically in Sections 2.5, Noise and 2.7, Wildfire, as well as Sections 3.1.1, Air Quality and 3.1.5, Hazards and Hazardous Materials. No changes to the EIR were determined to be necessary in response to this comment. As described in GR-6, comments related to social and economic issues do not specifically relate to the environmental analysis included in the Draft EIR. This response is provided for informational purposes and will be considered by the Board during the project approval process and will be made available through publication of this Final EIR. These comments do not warrant revisions to the Draft EIR.</p>
I10-12	<p>This comment summarizes the requested alterations to the proposed project.</p> <p>See responses I10-1 through I10-11 above, and Global Response GR-1, Visual Impacts. With respect to aesthetics, the Draft EIR provides an extensive analysis of potential impacts to aesthetic resources and states that no feasible mitigation measures have been identified to reduce the visual impacts of the project to a less-than-significant level (see Section 2.1, Aesthetics). CEQA does not require the adoption of infeasible mitigation measures or mitigation measures that would not avoid or lessen significant environmental impacts. Here, the County has determined that no feasible mitigation measure, including increased buffer distance, would reduce visual impacts to a level that is less than significant. As the Draft EIR acknowledges the significant and unavoidable impact to visual resources and incorporates all feasible reduction measures, no revisions to the Draft EIR are required and a Statement of Overriding Considerations will be prepared. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I10-13	<p>This comment concludes the letter.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment.</p>

**From:** [Weena Joshi](#)  
**To:** [Koutoufidis, Nicholas](#)  
**Subject:** [External] PUBLIC COMMENT OPPOSING STARLIGHT SOLAR PROJECT  
**Date:** Monday, September 15, 2025 1:31:02 PM

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**PUBLIC COMMENT OPPOSING STARLIGHT SOLAR PROJECT**

**Major Use Permit Application - San Diego County Planning Commission**

**Submitted by:** Weena Joshi

**Submitted to:** Nicholas Koutoufidis and San Diego County Planning & Development Services

**Date:** September 15, 2025

**Property Address:** 1594 Jewel Valley Road Boulevard, California 91905

**Project:** Starlight Solar Project, APNs 612-082-12 and others

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**EXECUTIVE SUMMARY**

I respectfully urge the San Diego County Planning Commission to **DENY** the Major Use Permit for the Starlight Solar Project. This 588-acre industrial development represents an environmental injustice that disproportionately burdens rural communities while failing to adequately address climate change in an equitable manner. The project's significant environmental impacts, particularly to visual resources, biological habitat, fire safety, water management and community well-being, outweigh any purported benefits.

I11-1

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**1. ENVIRONMENTAL JUSTICE AND DISPROPORTIONATE IMPACTS ON RURAL COMMUNITIES**

**Shifting Climate Burden to Vulnerable Communities**

The Starlight Solar Project exemplifies environmental injustice by transferring the responsibility for San Diego County's climate action goals to rural, under-resourced communities. While urban areas continue high-consumption lifestyles, rural Boulevard residents—with a population of only 410 people—are forced to bear the environmental costs of large-scale renewable energy development.

I11-2

**Lack of Community Resources and Voice**

Boulevard lacks the political and economic resources to adequately oppose this development. The community has no incorporated municipal government, limited public services, and residents lack the financial means to hire expert consultants to counter the developer's well-funded environmental reports. This power imbalance exemplifies environmental racism and classism.

I11-3

**Cumulative Environmental Burden**

I11-4

As documented in Table 1-4 of the DEIR, Boulevard is already bearing a disproportionate burden of renewable energy development, with multiple solar and wind projects approved or under construction nearby. This cumulative impact transforms a rural residential area into an industrial energy sacrifice zone.

I11-4  
(cont'd)

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## 2. MASSIVE DESTRUCTION OF PRISTINE DESERT CHAPARRAL ECOSYSTEM

### Scale of Environmental Destruction

The project will destroy 561 acres of largely pristine desert chaparral habitat through "clearing and grubbing." This represents an irreversible loss of native ecosystem that has developed over centuries in this arid environment.

I11-5

### Biological Resource Impacts

Despite claims of mitigation, the project will fragment critical wildlife corridors and destroy habitat for special-status species. The 447.93-acre "biological open space easement" cannot compensate for the direct habitat loss and fragmentation caused by industrial development.

I11-6

I11-7

### Heat Island Effect

The project will create a heat island effect by replacing 561 acres of transpiring vegetation with heat-absorbing solar panels and concrete, increasing local ground and air temperatures (some studies suggest up to 3–4 °C) that will further stress remaining wildlife and alter the natural desert ecosystem.

I11-8

[The Photovoltaic Heat Island Effect: Larger solar power plants increase local temperatures | Scientific Reports](#)

### Inadequate Mitigation

Off-site mitigation cannot restore the ecosystem services, wildlife corridors, and habitat connectivity that will be permanently destroyed. The project violates the principle of avoiding impacts rather than relying on questionable mitigation measures. Off-site mitigation cannot compensate for the direct destruction of on-site habitat because preserving already undisturbed land elsewhere does not replace the lost ecosystem functions, wildlife corridors, and habitat connectivity that will be permanently severed at this specific location.

I11-9

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## 3. SEVERE VISUAL AND SCENIC RESOURCE IMPACTS

### Industrialization of Rural Landscape

The project will transform 588 acres of natural desert landscape into an industrial facility with:

- 235,516 solar panels up to 12 feet high

I11-10

- Industrial fencing up to 7 feet with barbed wire
- Massive battery storage containers
- 50-foot transmission poles
- Industrial access roads throughout

**Permanent Scenic Degradation**

The visual impact will be permanent and irreversible, fundamentally altering the rural character that residents moved to Boulevard to enjoy. The project site is visible from surrounding residential properties and recreational areas, diminishing property values and quality of life.

**Inadequate Visual Impact Analysis**

The DEIR fails to adequately assess visual impacts from surrounding residential properties and underestimates the industrial nature of the facility's appearance in this rural setting.

**4. INCREASED WILDFIRE RISK AND PUBLIC SAFETY CONCERNS**

**Fire Risk from Battery Storage Systems**

The project includes 217.4 MW of lithium battery storage presenting significant fire risks:

- Battery thermal runaway can cause intense, difficult-to-extinguish fires
- Toxic gas emissions during battery fires pose health hazards
- Limited emergency response capability in rural Boulevard area

**Inadequate Fire Protection**

Boulevard Fire Station 47 lacks resources for major industrial fires involving battery storage systems. The project's fire protection plan places unrealistic expectations on volunteer firefighters and rural fire departments.

**Fuel Load Concerns**

While the project claims fuel modification will reduce fire risk, the industrial infrastructure and electrical equipment create new ignition sources in a high fire-hazard area.

**Increased Fire Risk from Vegetation Removal**

Contrary to the project's claims, clear-cutting 561 acres of natural chaparral will INCREASE fire risk by:

- Eliminating natural firebreaks created by diverse native plant communities
- Removing deep-rooted vegetation that maintains soil moisture and stability

I11-10  
(cont'd)

I11-11

I11-12

I11-13

I11-14

- Creating wind corridors that accelerate fire spread across cleared areas
- Destroying the natural patchwork of vegetation that slows fire progression
- Replacing fire-adapted native plants with non-native landscaping and structures that burn differently

The project falsely presents habitat destruction as "fuel modification" when mature chaparral actually provides natural fire protection through its evolved fire-resistance strategies.

I11-14  
(cont'd)

## 5. NOISE IMPACTS ON RURAL RESIDENTIAL COMMUNITY

### Industrial Noise in Quiet Rural Setting

The project will introduce continuous industrial noise from:

- Inverter cooling systems operating 24/7
- Battery storage system cooling equipment
- Tracking system motors throughout daylight hours
- Construction noise over 30 months total

### Baseline Noise Environment

Boulevard's rural setting currently has very low ambient noise levels. Any industrial noise represents a significant degradation of the peaceful rural environment residents chose.

### Inadequate Noise Analysis

The DEIR fails to adequately assess cumulative noise impacts from multiple inverters and cooling systems operating simultaneously across 588 acres.

I11-15

I11-16

## 6. CLIMATE JUSTICE CONCERNS

### False Solution to Climate Change

Large-scale solar projects in rural areas represent a false solution that allows urban areas to avoid reducing consumption while exporting environmental impacts to rural communities. True climate justice requires urban areas to reduce energy demand and implement distributed renewable energy.

### Perpetuating Environmental Inequity

The project perpetuates the same environmental inequities seen with fossil fuel infrastructure—concentrating industrial development and environmental burdens in rural, low-income communities while benefiting urban consumers.

I11-17

## 7. PROCEDURAL AND PLANNING CONCERNS

I11-18

**Inadequate Community Engagement**

The public participation process has been inadequate for meaningful community input. Rural residents lack resources to fully engage with complex technical documents and environmental reports.

I11-18  
(cont'd)

**Inconsistent with Rural Character**

The project fundamentally conflicts with the Rural Lands (RL-80) designation intended to preserve rural character and large lot residential development patterns.

I11-19

**Cumulative Impact Analysis Deficiencies**

The DEIR inadequately addresses cumulative impacts of multiple renewable energy projects transforming the Boulevard area into an industrial corridor.

I11-20

**Violation of CEQA's Environmental Justice Mandate**

This project fundamentally violates the spirit of CEQA by perpetuating environmental injustice. CEQA requires consideration of environmental justice impacts, yet this EIR fails to meaningfully address how concentrating industrial development in rural, low-income communities while benefiting urban consumers violates principles of equitable environmental protection. The law's intent is to prevent environmental harm, not simply document it while allowing disproportionate impacts on vulnerable communities.

I11-21

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**8. ECONOMIC JUSTICE ISSUES**

**Property Value Impacts**

The industrial development will significantly decrease surrounding property values, representing an uncompensated taking of residents' primary asset and retirement security.

**Insurance Cost Increases**

The concentration of multiple industrial energy facilities will fundamentally change the fire risk profile of Boulevard, likely resulting in increased homeowner's insurance premiums for all area residents—another uncompensated economic burden imposed on rural residents for urban benefit.

I11-22

**Burden Without Benefit**

Local residents bear all environmental costs while receiving no direct economic benefits. Construction jobs are temporary, and operational jobs are minimal.

**Utility-Scale Benefits Urban Areas**

The project's electricity will benefit urban San Diego consumers while rural residents suffer the environmental consequences—a classic environmental justice issue.

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## 9. ALTERNATIVES ANALYSIS DEFICIENCIES

### Insufficient Consideration of Distributed Solar

The DEIR fails to adequately analyze distributed solar alternatives that would avoid rural environmental impacts while providing the same renewable energy benefits.

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### No Analysis of Demand Reduction

The project assumes continued growth in energy demand without considering conservation and efficiency measures that could reduce the need for new generation.

I11-24

### Urban Solar Alternatives Dismissed

The DEIR inadequately considers urban brownfield sites, parking lots, and rooftop opportunities that could provide renewable energy without rural environmental destruction.

I11-25

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## 10. GROUNDWATER AND WATER RESOURCE IMPACTS

### Reduced Groundwater Recharge

The project will significantly impact local groundwater recharge through:

- Creation of 7 acres of impervious surfaces preventing natural infiltration
- Destruction of 561 acres of deep-rooted desert vegetation that facilitates groundwater recharge
- Altered surface hydrology redirecting natural infiltration patterns

I11-26

### Increased Water Demand on Limited Resources

The project will extract 67.9 acre-feet during construction and 0.81 acre-feet annually during operations from local groundwater sources. This additional demand burdens already stressed rural water systems serving a community of only 410 residents.

I11-27

### Threat to Rural Well Users

Many Boulevard residents rely on private wells. The combination of reduced recharge and increased extraction could lower groundwater levels, potentially impacting domestic wells that rural residents depend on for basic needs.

I11-28

### Environmental Justice in Water Access

Urban San Diego benefits from the renewable energy while rural residents face potential impacts to their basic water security—a fundamental environmental justice issue.

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## 11. MANDATORY CONDITIONS IF PROJECT IS APPROVED

While I strongly urge denial of this permit, if the Commission considers approval

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**despite these serious environmental justice concerns, the following conditions are essential to protect rural residents and natural resources:**

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**Enhanced Visual Impact Mitigation**

- Reduce the footprint from 588 acres to reduce the visual impact
- Plant mature native oak trees (*Quercus agrifolia*, *Q. engelmannii*) as living visual barriers along all property boundaries visible from residences
- Construct earthen berms with native vegetation screening along perimeter fencing
- Install living walls of native desert plants to screen industrial equipment
- Require underground placement of all electrical infrastructure and equipment to eliminate visual intrusion including Tule Jim Lane
- Require 300ft setbacks from property lines and roads to limit the impact to the visual resources

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**Comprehensive Biological Protection**

- Implement 3:1 habitat mitigation ratio (three acres of restoration for every acre disturbed)
- Require on-site habitat restoration within the same watershed and ecosystem
- Mandate salvage and successful transplantation of ALL native plants, not just special-status species
- Install wildlife crossing infrastructure to maintain habitat connectivity across the development

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I I11-36

I I11-37

**Groundwater and Water Resource Protection**

- Install permanent groundwater monitoring wells on all adjacent properties with 25-year monitoring commitment
- Implement comprehensive rainwater harvesting and on-site infiltration systems to capture all stormwater
- Provide legally binding guarantees to restore or replace any impacted private wells
- Create enhanced aquifer recharge systems to offset groundwater extraction impacts

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I I11-41

**Fire Safety and Emergency Preparedness**

- Construct on-site emergency response facility equipped for battery fire emergencies
- Install advanced fireproof barriers around all battery storage areas
- Implement state-of-the-art inert gas suppression systems for all electrical equipment
- Build redundant emergency access roads meeting fire department specifications

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I I11-44

**Noise and Air Quality Protection**

- Install sound barrier walls along all property boundaries near residential areas
- Mandate use of quietest available inverter and cooling system technology
- Establish permanent noise monitoring stations with real-time reporting to affected residents
- Install continuous air quality monitoring equipment throughout project operation

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**Community Protection and Benefit Requirements**

- Establish \$10 million Community Protection Fund to address property value impacts, infrastructure damage, emergency services enhancement, and ongoing environmental monitoring
- Reserve 25% of energy production for local residents at below-market rates
- Provide comprehensive road improvement and maintenance program for routes damaged by project traffic
- Fund independent environmental compliance monitor for entire project duration

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**Long-term Environmental Monitoring**

- Implement 25-year wildlife and habitat monitoring program with annual public reporting
- Conduct ongoing soil health and ecosystem monitoring across the entire site
- Maintain permanent archaeological monitoring during all construction phases
- Establish dark sky compliant lighting systems with full cutoff fixtures

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**Coordination and Timing Requirements**

- Mandate phased construction schedule preventing simultaneous development of multiple regional projects
- Require binding regional traffic impact mitigation for all approved projects
- Establish maximum combined construction workforce limits for the Boulevard area
- Create joint environmental monitoring across all regional energy projects

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**CONCLUSION AND REQUESTED ACTION**

The Starlight Solar Project represents everything wrong with current approaches to renewable energy development—it perpetuates environmental injustice, destroys irreplaceable natural resources, and burdens vulnerable rural communities while allowing urban areas to avoid difficult choices about consumption and development patterns.

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I11-58  
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**I respectfully request that the San Diego County Planning Commission:**

1. **DENY the Major Use Permit** for the Starlight Solar Project
2. Direct county staff to develop policies prioritizing distributed renewable energy in urban areas
3. Establish environmental justice criteria for renewable energy projects
4. Require comprehensive cumulative impact analysis for rural renewable energy development
5. If approval is considered despite these concerns, mandate ALL of the protective conditions outlined above

True climate action requires climate justice. Destroying rural landscapes and burdening small communities is not an acceptable path to renewable energy. San Diego County must find better solutions that don't sacrifice environmental justice for renewable energy goals.

Thank you for your consideration of these critical concerns.

**Respectfully submitted,**

Weena Joshi

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(805) 990-5924



**I11-58  
(cont'd)**

### 8.2.5.11 Response to Comment Letter I11 from Weena Joshi (received September 15, 2025)

Comment No.	Response
I11-1	<p>The commenter introduces the letter and expresses their opposition to the proposed project. The commenter states that the environmental impacts resulting from implementation of the project would outweigh any potential benefits.</p> <p>Responses to the specific comments in the letter are provided below.</p>
I11-2	<p>The commenter states that the project would result in environmental justice impacts to the local community.</p> <p>See Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice. The County appreciates the commenter’s concern about environmental justice. However, CEQA does not specifically reference “environmental justice,” nor does it require analysis of environmental justice concerns (see <i>Golden Door Properties, LLC v. County of San Diego</i> (2020) 50 Cal.App.5th 467, 555 n.46). Instead, CEQA focuses on evaluating potentially significant environmental impacts, including those that are cumulatively considerable. Traditionally, environmental justice issues pertain to the effects of pollution on low-income communities (California Department of Justice 2012). Additionally, under the County of San Diego’s General Plan, the community of Boulevard was not designated as an Environmental Justice community in the County. As described in GR-6, comments related to social and economic issues do not specifically relate to the environmental analysis included in the Draft EIR. This response is provided for informational purposes and will be considered by the Board during the project approval process and will be made available through publication of this Final EIR. These comments do not warrant revisions to the Draft EIR.</p>
I11-3	<p>The commenter states that Boulevard lacks the resources to adequately oppose developments like the proposed project.</p> <p>This is not a comment on the environmental impact analysis contained in the EIR; therefore, a response is not required and no changes to the EIR were determined to be necessary in response to this comment.</p>
I11-4	<p>The commenter states that cumulative impacts of the project in addition to related utility-scale renewable energy projects would result in disproportionate environmental impacts throughout the region.</p> <p>The County appreciates the commenter’s concern regarding cumulative impacts. Section 1.7 in Chapter 1.0, Project Description, Location, and Environmental Setting, of the Draft EIR includes a list of related projects in the surrounding area (see Table 1-4 and Figure 1-13). Each environmental resource topic in the Draft EIR includes a discussion of potential cumulative impacts of the project and the related projects. As discussed in Global Response GR-2, Cumulative Impacts, two new projects have been added to the proposed project’s cumulative analysis. However, the cumulative impacts of the project have not changed with the addition of these projects.</p> <p>The County has not specifically identified the communities of Boulevard or Jacumba for potential renewable energy development projects. However, the County’s Regional Decarbonization Framework technical report notes that the Mountain Empire subregion of the County, which includes the communities of Boulevard and Jacumba, is particularly suitable to solar development due to climate of the area which leads to high solar irradiance, as well as proximity to existing transmission infrastructure (County of San Diego 2022). While these factors increase the favorability of solar development in the Boulevard-Jacumba area, they do not indicate that the County has preference or encourages proposed renewable projects to be developed in Boulevard or Jacumba as these factors are inherent to the existing conditions of the area. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I11-5	<p>The commenter states that the proposed “clearing and grubbing” during construction of the proposed project would result in permanent impacts to the local desert chaparral ecosystem.</p> <p>The County appreciates the commenter’s concern regarding biological impacts. As discussed in Section 2.2, Biological Resources, of the Draft EIR, Phase I of the project would impact up to 92.54 acres of Granitic Northern Mixed Chaparral, 24.53 acres of Redshank Chaparral, and 3.03 acres of Granitic Chamise Chaparral. Phase II of the project would impact up to 126.33 acres of Granitic Northern Mixed Chaparral, 119.35 acres of Redshank Chaparral, and 61.56 acres of Granitic Chamise Chaparral. However, an off-site mitigation area, which would be implemented by mitigation measure M-BI-3, would be granted over an approximately 447.93-acre area that includes sensitive vegetation communities, special-status plant species, and habitat for special-status species to protect sensitive biological resources. The mitigation area primarily consists of Granitic Northern Mixed Chaparral and Redshank Chaparral. The County finds M-BI-3 sufficient to address impacts to chaparral vegetation communities.</p> <p>Additionally, CEQA does not require the adoption of mitigation measures that are not feasible (State CEQA Guidelines Section 21002.1(b)). CEQA defines “feasible” to mean “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” (State CEQA Guidelines Section 15364). Here, legal factors prevent the implementation of “drive and crush” grading. The County of San Diego’s Fire Code requires vegetation within</p>

Comment No.	Response
	<p>solar arrays to be maintained at a maximum height of six (6) inches and in a non-combustible condition. This standard applies to all solar/battery facilities within the County's high and very high fire hazard zones. While the "drive and crush" approach has worked in desert environments with sparse fuels and lower ignition risk, it is not compatible with San Diego's fire conditions and vegetation management requirements. Therefore, the County determines that the drive and crush grading method is infeasible for the project. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I11-6	<p>The commenter states that the project would fragment wildfire corridors and impact special-status species habitat.</p> <p>The County appreciates the commenter's concern regarding biological impacts. As discussed in Section 2.2, Biological Resources, of the Draft EIR, the project could have potentially significant impacts to biological resources. However, the project would implement the following mitigation measures, to minimize impacts to biological resource to the extent feasible: M-BI-1 (Biological Monitoring), M-BI-2 (Temporary Construction Fencing), M-BI-3 (Habitat Preservation), M-BI-4 (Resource Management Plan), M-BI-5 (Avian Breeding and Special-status Wildlife Impact Avoidance), M-BI-6 (Biological Monitoring of Stormwater Pollution Prevention Plan Implementation), M-BI-7 (Prevention of Chemical Pollutants), M-BI-8 (Prevention of Invasive Plant Species), M-BI-9 (Operations and Maintenance Signage), M-BI-10 (Noise Reduction), M-BI-11 (Mitigation Measures and Design Considerations for Jurisdictional Wetlands and Waterways), M-BI-12 (Wildlife Corridor), and M-BI-13 (Special-status Plants). As concluded in Section 2.2, Biological Resources, of the Draft EIR, implementation of these mitigation measures would reduce impacts to less than significant. As such, the Draft EIR and the Biological Resources Report (Appendix D to the Draft EIR) have sufficiently analyzed potential impacts to biological resources that satisfy County requirements. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I11-7	<p>The commenter states that the 448-acre biological open space easement would not adequately address the biological impacts of the project.</p> <p>See Response I11-5 and I11-6 above. The County appreciates the importance of mitigating potentially significant environmental effects associated with impacts to biological resources. The project's proposed biological open space easement and the project site are both situated within the Upper Carrizo Creek Watershed across similar topography, elevational range, and vegetation communities. The project's proposed mitigation ratios are consistent with the requirements of the East County Multiple Species Conservation Program (MSCP) and were approved by County and California Department of Fish and Wildlife (CDFW) biologists (County of San Diego 2008). The County finds the 448-acre open space easement implemented by M-BI-3 (Habitat Preservation) the project would also implement the following mitigation measures, to minimize impacts to biological resource to the extent feasible: M-BI-1 (Biological Monitoring), M-BI-2 (Temporary Construction Fencing), M-BI-4 (Resource Management Plan), M-BI-5 (Avian Breeding and Special-status Wildlife Impact Avoidance), M-BI-6 (Biological Monitoring of Stormwater Pollution Prevention Plan Implementation), M-BI-7 (Prevention of Chemical Pollutants), M-BI-8 (Prevention of Invasive Plant Species), M-BI-9 (Operations and Maintenance Signage), M-BI-10 (Noise Reduction), M-BI-11 (Mitigation Measures and Design Considerations for Jurisdictional Wetlands and Waterways), M-BI-12 (Wildlife Corridor), and M-BI-13 (Special-status Plants). As concluded in Section 2.2, Biological Resources, of the Draft EIR, implementation of these mitigation measures would reduce impacts to less than significant. As such, the Draft EIR and the Biological Resources Report (Appendix D to the Draft EIR) has sufficiently analyzed potential impacts to biological resources that satisfy County requirements. Therefore, potential impacts related to biological resources have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required in response to this comment.</p>
I11-8	<p>The commenter expresses concern regarding the project potential heat island effect and states that studies have shown that utility scale solar projects can increase local ambient temperatures by up to 8 F.</p> <p>Refer to Global Response GR-4, Heat Island Effect. Given that there are no significance thresholds for the photovoltaic heat island effect and given the limited number of studies regarding this effect, there is no evidence that any possible increase in ambient temperature from the proposed project would significantly impact human health or the environment. No changes to the EIR were determined to be necessary in response to this comment.</p>
I11-9	<p>The commenter asserts that the proposed mitigation measure for biological resource impacts, including the 448-acre open space easement, is inadequate.</p> <p>See Response I11-7. The County has determined that proposed mitigation measures included in the Draft EIR would be feasible and would reduce impacts to biological resources to less than significant.</p>

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I11-10	<p>The commenter states that the proposed project would result in permanent visual impacts.</p> <p>See Global Response GR-1, Visual Impacts. The County appreciates the commenter's concern regarding visual impacts. As discussed in the Draft EIR, the project would result in significant and unavoidable impacts to visual resources. Specifically, as detailed in Section 2.1, Aesthetics, the project would result in significant impacts related to Visual Character and Quality (Impact AE-1), Valued Visual Character and Image of Neighborhood or Community (Impact AE-2), and Focal and Panoramic Vistas (Impact AE-3). No feasible mitigation measures have been identified to reduce the visual impacts of the project to a less than significant level. CEQA does not require the adoption of infeasible mitigation measures or mitigation measures that would not avoid or lessen significant environmental impacts. Here, the County has determined that no feasible mitigation measure, including increased buffer distance, would reduce visual impacts to a level that is less than significant. As such, if the proposed project is approved, the County will prepare a Statement of Overriding Considerations, as required by CEQA Guidelines Section 15093. The comments received on the Draft EIR will be included in the project's administrative record and presented to the Board of Supervisors (Board) for review. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I11-11	<p>The commenter states that the Draft EIR fails to assess visual impacts to the private views of surrounding residences.</p> <p>See Global Response GR-1, Visual Impacts. Although impacts to private views are not considered significant under CEQA and mitigations for private views are not required, the project will include project design feature PDF-AE-1, which would help screen views of the project from nearby private residences. Additionally, an analysis of the project's direct and indirect impacts related to visual resources and aesthetics is provided in Section 2.1, Aesthetics, of the Draft EIR. The information provided in this section is based on the Visual Resources Assessment (Appendix C) prepared for the proposed project. Therefore, potential impacts to visual resources have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required. For ease of reference, PDF-AE-1 states:</p> <p style="padding-left: 40px;">The Applicant will coordinate with the resident of any existing (existing as of the date of this Major Use Permit Decision) private residence located within a distance of 500 feet of a project solar panel installation to assess visibility impact complaints made within 1 year from the initial operations date of the project. This assessment would include possible remedies that the Applicant may implement depending upon the level of visibility impacts occurring at the residence, including financial assistance for the installation of visual screening measures, such as landscaping or fencing. Requests for assistance can be made through a project hotline to be established by the Applicant and published on the Applicant's website.</p> <p>With respect to aesthetics, the Draft EIR provides an extensive analysis of potential impacts to aesthetic resources and states that no feasible mitigation measures have been identified to reduce the visual impacts of the Project to a less than significant level (see Section 2.1, Aesthetics). CEQA does not require the adoption of infeasible mitigation measures or mitigation measures that would not avoid or lessen significant environmental impacts. Here, the County has determined that no feasible mitigation measure, including increased buffer distance, would reduce visual impacts to a level that is less than significant. No changes to the EIR were determined to be necessary in response to this comment.</p>
I11-12	<p>The commenter expresses concern that the introduction of a lithium battery storage facility would increase wildfire risk due to the potential for a thermal runaway fire at the project site and could result in the release of potentially toxic emissions occur if the project site caught fire. The commenter also expresses concern regarding the limited emergency response capabilities of the Boulevard area.</p> <p>See Global Response GR-5, Wildfire Risks. As discussed in Chapter 1.0, Project Description, Location, and Environmental Setting, the battery energy storage system (BESS) facilities included in the proposed project would use lithium iron phosphate batteries. Lithium iron phosphate batteries have higher thermal stability and a higher thermal runaway threshold than lithium manganese cobalt batteries. As a result, lithium iron phosphate batteries are inherently safer with a lower risk of thermal runaway as compared to lithium manganese cobalt or traditional lithium-ion batteries (Evro et al. 2024).</p> <p>As detailed in the Construction Fire Protection Plan (FPP), each battery storage cabinet would have a metal frame with insulation, air conditioning, and fire suppression, with separate enclosures for the electronic controls, inverters, and rectifiers. There would be a built-in heat detection and fire protection system and a fire extinguishing system. The heat and fire detection system would be linked to an automatic inert gas suppression system within each cabinet. The containers would also have an interior aerosol fire suppression system. The National Fire Protection Association (NFPA) has developed a new Standard for the Installation of Stationary Energy Storage Systems (NFPA 855). This standard addresses the design, construction, installation, commissioning, operation, maintenance, and decommissioning of stationary energy storage systems. The system would be designed in accordance with applicable NFPA safety standards. The BESS would be sited with a setback from off-site areas as a buffer against potential wildfire ignitions. The cabinets would not be walk-in containers; thus, the battery storage cabinets would be non-habitable structures per the state and local fire codes that are in place at the time a building permit application is submitted to the County.</p> <p>Regarding emergency response, Section 2.7, Wildfire, of the Draft EIR addresses Emergency Response and Evacuation Plans in detail. The Draft EIR concludes that the project would result in a less-than-significant</p>

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	<p>impact related to impairing implementation of an adopted emergency response plan or emergency evacuation plan or conflicts with the Safety Element of the General Plan. No changes to the EIR were determined to be necessary in response to this comment.</p>
I11-13	<p>The commenter expresses concern regarding increased wildfire ignition risk associated with the project being constructed in a high fire hazard severity zone.</p> <p>The County appreciates the commenter's concern regarding wildfire risk. The Draft EIR, which accounts for the project's location in a Very High Fire Hazard Severity Zone, concludes that, with the incorporation of M-WF-1 through M-WF-6, the project would not exacerbate the risk of fire ignition at the project site; therefore, environmental impacts were determined to be less than significant. M-WF-1 (Fire Protection Plan) requires the implementation of numerous risk reduction measures to ensure adequate fire mitigation, internal project site access, and safety during construction, operation, and decommissioning activities. M-WF-2 (Fuel Modification Zones) would require the implementation and maintenance of fuel modification zones (FMZs), which would reduce wildfire risks during project operations. M-WF-3 (Battery Energy Storage System Measures) requires the incorporation of safety measures that would reduce fire risk at the BESS and would reduce the spread potential from a fire starting in the BESS. M-WF-4 (Construction Fire Protection Plan) requires the implementation of a Construction Fire Protection Plan, which would reduce wildfire ignition risk during construction and decommissioning activities. M-WF-5 (Red Flag Warning Measures) outlines precautions during elevated weather conditions to minimize the potential of uncontrolled spread of a wildfire. Lastly, M-WF-6 (Fire Protection and Mitigation Agreement) requires the Applicant to enter into a Fire Protection and Mitigation Agreement with the San Diego County Fire Protection Department (SDCFPD) to make a fair share contribution toward local emergency response capabilities (see Appendix P). These measures are consistent with the recommendations of the comprehensive FPP and applicable fire codes (see Appendix L). The FPP provides fire behavior modeling for on-site and off-site fuels, including under worst-case-scenario conditions. The results from the modeling would provide guidance for design and measures to lessen the threat of and hazards from ignitions and wildfires, including specifically during construction activities. Potential environmental impacts associated with wildfire have been adequately assessed in the Draft EIR, and no new significant environmental issues have been identified. State CEQA Guidelines Section 15088(a) does not require a response to comments that do not raise significant environmental issues. Therefore, no revisions to the Draft EIR are necessary.</p>
I11-14	<p>The commenter states that the vegetation removal associated with construction of the project would result in increased wildfire risk and claims that the proposed fuel modification measure would actually increase fire risk by removing mature chaparral vegetation.</p> <p>See Global Response GR-5, Wildfire Risks. Additionally, the Fire Protection Plan prepared for the proposed project, provided as Appendix L to the Draft EIR, includes the results of a Fire Behavior Model, which shows that the proposed FMZs would successfully reduce wildfire risks as intended. The report finds that the FMZs would change fire behavior by reducing fuels in critical areas where new fire starts are likely and would create additional defensible space from off-site fuels to prevent large spread of a new fire regardless of rate of spread. Therefore, potential wildfire impacts have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
I11-15	<p>The commenter states that the project would result in noise impacts during construction as well as during operations due to the use of inverter cooling systems, BESS cooling systems, and solar panel trackers.</p> <p>The County appreciates the commenter's concern regarding noise impacts. As provided in Section 2.5, Noise, of the Draft EIR, and the Noise Analysis Report prepared for the proposed project (Appendix J.1), a noise measurement survey of the existing ambient noise environment consisting of a series of sound level measurements was conducted at nine locations in the project area on June 8, 2022 (see Figure 2.5-1). The measured sound levels in the project area ranged from approximately 30 A-weighted decibels (dBA) continuous sound level (Leq) to 43 dBA Leq (see Table 2.5-2). Based on the modeling results, noise levels at the project boundary would range up to 37 dBA Leq at the property line corner closest to the BESS area. Therefore, noise levels would comply with County Noise Ordinance Section 36.404 and would not exceed the "rural noise standards" of 50 dBA from 7:00 a.m. to 10 p.m. and 45 dBA from 10:00 p.m. to 7:00 a.m. No changes to the EIR were determined to be necessary in response to this comment.</p>

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I11-16	<p>The commenter claims that the Draft EIR fails to adequately assess cumulative noise impacts from simultaneous operational activities associated with the inverters and cooling systems.</p> <p>Section 2.5 of the Draft EIR assesses operational noise impacts for the entire 588-acre project, including stationary equipment, inverters and transformers, and battery storage containers, including heating, ventilation, and air conditioning (HVAC) units (see page 2.5-18 of the Draft EIR). The Draft EIR determined that noise impacts from on-site operations would be less than significant. Regarding cumulative impacts, as shown on Figure 1-13 in Chapter 1.0, Project Description, Location, and Environmental Setting, with the exception of the Tule Wind Groundwater Permitting Project, all of the past, present, and reasonably anticipated future projects in the project area would be several miles away from the project site. Due to the attenuation of noise over large distances, noise generated during operation of the project would not contribute to any significant cumulative noise impacts. Therefore, operational noise impacts and potential cumulative impacts related to noise have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
I11-17	<p>The commenter expresses concerns regarding the environmental justice impacts of the project due to its location in a low-income, rural community.</p> <p>See Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice and Response I11-2 above. CEQA does not specifically reference “environmental justice,” nor does it require analysis of environmental justice concerns. Additionally, under the County of San Diego’s General Plan, the community of Boulevard was not designated as an Environmental Justice community in the County. No changes to the EIR were determined to be necessary in response to this comment.</p>
I11-18	<p>The commenter claims that the project’s community engagement efforts have been inadequate, and that the local community lacks the resources to properly engage with the Draft EIR.</p> <p>Throughout the environmental review process, an effort was made to inform, contact, and solicit input from the public as well as various federal, state, regional, and local government agencies and other interested parties on the project.</p> <p>On March 23, 2023, the County published an Notice of Preparation (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. A public scoping meeting was held to solicit comments on the NOP on Wednesday, April 12, 2023, at 6:00 p.m. at 39919 Ribbonwood Road in Boulevard, CA.</p> <p>The Draft EIR and its appendices were available for public review on the County’s website during the public review period from July 31, 2025, to September 15, 2025. 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.</p> <p>In compliance with the CEQA Guidelines, the County, as the Lead Agency for the project, has provided opportunities for the public to participate in the environmental review process. No changes to the EIR were determined to be necessary in response to this comment.</p>
I11-19	<p>The commenter states that the project conflicts with the RL-80 land use designation of the project site.</p> <p>The County’s General Plan identifies that the project site is within the rural regional category and designates the project site as Rural Lands 80 (RL-80). The County’s Zoning Ordinance identifies the site as General Rural (S92). The project would be considered a Major Impact Service and Utility under Section 1355 of the Zoning Ordinance, which is an allowable use with the approval of a Major Use Permit (MUP). According to Section 1350 of the Zoning Ordinance, Major Impact Services and Utilities may be conditionally permitted in any zone if it is determined that public interest supersedes the usual limitations placed on land use and transcends the usual restraints of zoning for reasons of necessary location and community-wide interest. The MUP process considers the location, size, and operating characteristics of the proposed use and must find that the project would be compatible with adjacent uses with consideration given to the following: harmony in scale; availability of public facilities, services and utilities; effect on desirable neighborhood character; generation of traffic; and suitability of the site for type and intensity of use (Section 7358). The application for a MUP would be processed according to Section 7350 of the Zoning Ordinance, including making required findings pursuant to Section 7358. In accordance with Section 6954(b)(3), the project would be subject to requirements related to setbacks, height, visual, and security. The MUP would also be referred to the Boulevard Community Design Review Board, pursuant to Section 7355. Therefore, the project would be consistent with the County’s Zoning Ordinance. No changes to the EIR were determined to be necessary in response to this comment.</p>
I11-20	<p>The commenter states that the Draft EIR inadequately addressed the cumulative impacts of the project in addition to related utility-scale renewable energy projects in the region.</p> <p>See Global Response GR-2, Cumulative Impacts, and Response I11-4 above. As discussed in GR-2, Cumulative Impacts, which addresses the request for the County to prepare a Program EIR related to utility-scale renewable development in the Mountain Empire subregion of Eastern San Diego County, such level of analysis is not required by CEQA. CEQA only requires environmental review when there is a specific project or policy being proposed for approval. In this case, the County is not creating a new program or plan for renewable energy—individual projects will continue to be reviewed separately under existing policies and</p>

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	<p>zoning. The County previously looked into doing broader renewable energy planning through its Renewable Energy Work Plan (2013–2014) and determined that a program-level study was not necessary. Since that time, renewable projects have been reviewed individually with the level of CEQA analysis appropriate for each proposal. A new programmatic review would not add value or meet a specific CEQA need at this stage. No changes to the EIR were determined to be necessary in response to this comment.</p>
I11-21	<p>The commenter states that the Draft EIR fails to meet the environmental justice requirements of CEQA, and states that the intent of CEQA is to prevent environmental harm.</p> <p>See Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice and Response I11-2 above. CEQA does not specifically reference “environmental justice,” nor does it require analysis of environmental justice concerns. Additionally, under the County of San Diego’s General Plan, the community of Boulevard was not designated as an Environmental Justice community in the County. No changes to the EIR were determined to be necessary in response to this comment.</p>
I11-22	<p>The commenter states that the project would decrease property values and would impact the character of the local community.</p> <p>See Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice and Response I11-2 above. No changes to the EIR were determined to be necessary in response to this comment.</p>
I11-23	<p>The commenter states that the Draft EIR fails to analyze distributed solar as a potential project alternative.</p> <p>As discussed in Chapter 4.0, Project Alternatives, of the Draft EIR, an alternative location for the project would not be feasible. State CEQA Guidelines Section 15126.6(f)(1) lists several factors that may be considered when addressing feasibility of alternatives (any alternative, not just alternative locations) and states that “No one of these factors establishes a fixed limit on the scope of reasonable alternatives.” Specifically, an alternative site need not be considered when implementation is “remote and speculative,” such as when the alternative site is beyond the control of a project applicant (<i>Goleta Union School District v. Regents of University of California 1995</i>). No other readily available undeveloped parcels of comparable size exist in the eastern part of the County that could accommodate the project. Other sites have either already been evaluated and deemed unsuitable for similar solar development, lack sufficient access, are too distant from existing infrastructure, or are not available for acquisition by the applicant within a reasonable timeframe. As such, a feasible alternative site was not identified.</p> <p>Additionally, as the project is being permitted through the County, the alternative site would have to be within the jurisdiction of the County, and not within an incorporated jurisdiction. Much of the existing urban and industrial areas within San Diego County are under the jurisdiction of an incorporated municipality, such as the City of San Diego. The County does not have jurisdictional control over alternative locations in incorporated jurisdictions, and as such, alternative locations within these areas cannot feasibly be implemented by the County.</p> <p>According to the County’s Regional Decarbonization Framework, rooftop solar, while an important option for achieving the County’s decarbonization goals, is typically more expensive per megawatt than utility-scale solar projects, and can often be difficult to implement:</p> <p style="padding-left: 40px;"><i>Most residential solar installations in the San Diego region are on single-family homes. Several challenges make it difficult to install solar technology on multifamily rental buildings. The building owner would have to pay for the installation but would not necessarily realize any benefit, and the tenants would benefit but they do not own the building or control operational decisions. In addition, if solar is installed it can be difficult to allocate the electric production to each tenant in a building.</i></p> <p>According to the San Diego County Regional Decarbonization Framework, both rooftop solar and utility-scale solar projects would need to be implemented in order to meet the energy demand of the region while relying on renewable resources. As shown in Table 2.5 of the Regional Decarbonization Framework Technical Report, relying solely on rooftop solar would result in a significant energy deficit (County of San Diego 2022). Therefore, the County would be unable to achieve their renewable energy goals without the use of utility-scale solar projects, such as the project. As such, rooftop solar would not be a feasible alternative to the project.</p> <p>Furthermore, the basic purpose of an EIR’s alternatives discussion is to determine if fundamental project objectives might be achieved at less environmental cost. Although alternatives need not implement all project objectives, an EIR is not required to include alternatives that are incompatible with the project’s fundamental purpose (see <i>In re Bay-Delta Programmatic Evt’l Impact Report Coordinated Proceedings</i> (2008) 43 Cal.4th 1143, 1165). Here, as provided in Chapter 1.0, Project Description, Location, and Environmental Setting, the project’s fundamental objective is to permit, construct, and operate utility-scale solar energy and battery storage as near as possible to existing San Diego Gas &amp; Electric (SDG&amp;E) transmission infrastructure in eastern San Diego County. Utility-scale solar and distributed solar projects, such as rooftop solar systems, fundamentally differ in size and in the location of their connection to the electrical grid. Here, the project’s first objective is to develop a large, utility-scale system consisting of a 100-megawatt (MW) solar energy system and a 217 MW BESS that is connected to SDG&amp;E’s high-voltage transmission infrastructure. Distributed energy resources such as rooftop solar are smaller scale systems connected to the electrical grid at the distribution level (California Energy Commission 2025). Therefore, the commenters’ proposed rooftop solar alternative would be incompatible with the Project’s fundamental purpose, and the EIR is not required to</p>

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	evaluate the rooftop solar alternative. No changes to the Draft EIR were determined to be necessary in response to this comment.
I11-24	<p>The commenter states that the Draft EIR fails to analyze energy demand reduction as a potential project alternative.</p> <p>See Response I11-23 above. CEQA provides that the lead agency, in the Final EIR, may reject alternatives that do not satisfy project goals, do not offer substantial environmental advantages, or are infeasible given economic, environmental, or technological factors involved (see <i>Bay Area Citizens v. Association of Bay Area Governments</i> (2016) 248 Cal.App.4th 966). The suggested alternative would not meet any of the project objectives. No changes to the EIR were determined to be necessary in response to this comment.</p>
I11-25	<p>The commenter states that the Draft EIR fails to analyze rooftop solar as a potential project alternative.</p> <p>See Response I11-23 above. CEQA provides that the lead agency, in the Final EIR, may reject alternatives that do not satisfy project goals, do not offer substantial environmental advantages, or are infeasible given economic, environmental, or technological factors involved (see <i>Bay Area Citizens v. Association of Bay Area Governments</i> (2016) 248 Cal.App.4th 966). The suggested alternative would not meet any of the project objectives. No changes to the EIR were determined to be necessary in response to this comment.</p>
I11-26	<p>The commenter states that the project would impact local groundwater recharge by increasing impervious surfaces, removing mature vegetation, and altering surface hydrology.</p> <p>See Global Response GR-3, Groundwater Impacts. The project does not propose the use of any on-site wells and would therefore not result in drawdown of the local groundwater aquifer. Further, the project would not result in a significant increase in impervious surfaces or significantly alter the existing drainage pattern of the project site. As such, the project would not result in impacts related to groundwater recharge. The project would import nonpotable water for construction and fire suppression purposed from the Jacumba Community Services District (JCSD), and would implement a Groundwater Monitoring and Mitigation Plan (GMMP) for the JCSD groundwater wells which would ensure that the project would not result in significant impacts to the local groundwater aquifer. No changes to the EIR were determined to be necessary in response to this comment.</p>
I11-27	<p>The commenter expresses concern regarding the amount of water required for project construction and operation.</p> <p>See Global Response GR-3, Groundwater Impacts. According to the Groundwater Resources Investigation Report prepared for the proposed project (Appendix G.5), the JCSD has sufficient capacity to serve the project during construction, operation, and decommissioning, in addition to other approved and proposed projects in the nearby vicinity. Additionally, according to the sales agreement dated June 28, 2022, the JCSD would have sufficient water supplies to support the proposed project. No changes to the EIR were determined to be necessary in response to this comment.</p>
I11-28	<p>The commenter states that the water demand of the project and reduced groundwater recharge would result in impacts to nearby residential wells.</p> <p>See Response I11-26 above. No changes to the EIR were determined to be necessary in response to this comment.</p>
I11-29	<p>The commenter emphasizes their opposition to the proposed project.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not required and no changes to the EIR were determined to be necessary in response to this comment.</p>
I11-30	<p>The commenter requests that the total footprint of the project should be reduced to minimize potential visual impacts.</p> <p>See Global Response GR-1, Visual Impacts. A reduced project footprint was considered in the Draft EIR. The project, as currently proposed, would include 588 acres of development. However, as discussed in Chapter 4.0, Project Alternatives, of the Draft EIR, the "Reduced Development Alternative" proposes to implement a smaller version of the project. Under the Reduced Development Alternative, the development footprint would be 538 acres, a reduction of 50 acres from the proposed project. This alternative would remove approximately 50 acres of solar arrays and infrastructure in the northern portion of the project (Areas A-1 and A-2). This reduction in the development footprint would remove solar arrays from the northern side of the ridgeline and provide a visual buffer between the proposed solar facility, Old Highway 80, I-8, and some of the off-site private properties. CEQA provides that the lead agency, in the Final EIR, may reject alternatives that do not satisfy project goals, do not offer substantial environmental advantages, or are infeasible given economic, environmental, or technological factors involved (see <i>Bay Area Citizens v. Association of Bay Area Governments</i> (2016) 248 Cal.App.4th 966).</p> <p>With respect to aesthetics, the Draft EIR provides an extensive analysis of potential impacts to aesthetic resources and states that no feasible mitigation measures have been identified to reduce the visual impacts of the Project to a less than significant level (see Section 2.1, Aesthetics). As stated above, CEQA does not require the adoption of infeasible mitigation measures or mitigation measures that would not avoid or lessen significant environmental impacts. Here, the County has determined that no feasible mitigation measure,</p>

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	including increased buffer distance, would reduce visual impacts to a level that is less than significant. No changes to the EIR were determined to be necessary in response to this comment.
I11-31	<p>The commenter requests that the project should plant mature native oak trees, construct earthen berms with native landscaping, and install native plant walls to screen the view of the proposed project components from nearby residences.</p> <p>See Global Response GR-1, Visual Impacts. The project, as currently proposed, would not include landscaping screening. As discussed in Section 2.1, Aesthetics, of the Draft EIR, installing landscaping around the entire project site for screening purposes would be infeasible, due to the high winds and arid conditions of the area. It would be highly unlikely that new vegetation would survive at a large enough scale (i.e., grow to maturity) to screen the entire project from nearby views. Regarding the commenter's proposal that mature native oak trees should be planted as living barriers along all property boundaries visible from residences, a U.S. Forest Service study concluded that the projected long-term survival rate of transplanted coast live oaks ranging from 15 to 100 cm in diameter (at breast height) in Southern California would be approximately 10% to 40% (U.S. Department of Agriculture 1997). Pursuant to State CEQA Guidelines Section 21002.1(b), CEQA does not require the adoption of infeasible mitigation measures. Therefore, the County disagrees with the commenters' assertion that landscape screening must be installed around the entire project site and that mature oak trees should be transplanted along property boundaries. However, as discussed in PDF-AE-1, the Applicant will coordinate with the resident of any existing private residence located within a distance of 500 feet of a project solar panel installation to assess possible remedies, including financial assistance, for the installation of visual screening measures, including landscape screening. For ease of reference, PDF-AE-1 states:</p> <p style="padding-left: 40px;">The Applicant will coordinate with the resident of any existing (existing as of the date of this Major Use Permit Decision) private residence located within a distance of 500 feet of a project solar panel installation to assess visibility impact complaints made within 1 year from the initial operations date of the project. This assessment would include possible remedies that the Applicant may implement depending upon the level of visibility impacts occurring at the residence, including financial assistance for the installation of visual screening measures, such as landscaping or fencing. Requests for assistance can be made through a project hotline to be established by the Applicant and published on the Applicant's website.</p> <p>Therefore, through implementation of PDF-AE-1, some of the proposed project components would be screened from view. No changes to the EIR were determined to be necessary in response to this comment.</p>
I11-32	<p>The commenter requests that the project should underground the proposed gen-tie line crossing Tule Jim Lane.</p> <p>See Global Response GR-1 Visual Impacts. The project, as currently proposed, would not underground the entire proposed gen-tie line; however, only 100 feet of the approximately 3,500-foot-long gen-tie would be above ground. The primary reason for an overhead section crossing Tule Jim Lane is to avoid encroaching on an existing underground 138-kV transmission line in Tule Jim Lane that connects to the substation. Per Section 851 of the California Public Utilities Code, SDG&amp;E must obtain California Public Utilities Commission (CPUC) approval to ensure that a possible encroachment on their facilities or equipment is not adverse to public interest. The overhead section over the road eliminates the encroachment but not the requirement for SDG&amp;E to consult with the CPUC. Also, undergrounding the proposed gen-tie line at the Tule Jim Lane overcrossing would require a full road closure during project construction, which would severely limit access to the residences along Tule Jim Lane (traffic detours would not be feasible due to the lack of improved roads in the area). Further, the proposed gen-tie overcrossing would be visually consistent with the existing overhead power lines along Tule Jim Lane. CEQA does not require an EIR to consider alternatives that would improve a project's environmental baseline (see <i>In re Bay-Delta Programmatic Env't Impact Report</i> (2008) 43 Cal.4th 1143). Here, the issue is not the visual impact of overhead power lines, but whether the addition of a new overhead power line similar in form, line, color, and texture to existing overhead power lines will cause a significant new environmental impact. Therefore, the County disagrees with the commenters' assertion that undergrounding the gen-tie line at the Tule Jim Lane crossing is required because the overhead the gen-tie line would not introduce a new visual element to the area surrounding Tule Jim Lane, and it would not result in a significant new visual impact. No changes to the EIR were determined to be necessary in response to this comment.</p>
I11-33	<p>The commenter requests that the project should implement a 300-foot buffer from all property lines and roads.</p> <p>See Global Response GR-1 Visual Impacts. The project, as currently proposed, does not include a uniform 300-foot buffer between the proposed photovoltaic (PV) panels and adjacent properties and roads. Rather, the project includes a minimum buffer of 30 feet, between the proposed project components and the boundaries of the project site. Further, as shown in Figure 1-3 in Chapter 1.0 of the Draft EIR, the project boundaries do not fully encompass the entire footprint of the parcels in which the project is proposed, which greatly increases the buffer distances in some areas of the project site. For example, Area B would be located over 2,000 feet east of the adjacent parcel to the west, and Area E would be located over 200 feet west of the adjacent parcel to the east. Additionally, as shown in Figure 1-6 in Chapter 1.0 of the Draft EIR, the project contains 15 cultural open space easement areas of various sizes within the project site, totaling 24.44 acres. No development or disturbance would occur within the open space easement areas. The open space</p>

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	<p>easements along the edges of the site would increase the distance of the project components from the nearest adjacent parcels by between 120 feet and 500 feet in some areas, including the northwestern and southwestern edges of Area A-2, as well as the southwestern corner of Area A-1. Further, it should be noted that most existing residences in the surrounding vicinity are substantially set back from their own property lines, which increases the distance between existing residences and the proposed project components. With the exception of the residence located 150 feet west of the project site (northwest of Area A-2), all other residences would be over 400 feet away from the proposed PV panels. No changes to the EIR were determined to be necessary in response to this comment.</p>
111-34	<p>The commenter requests that the project should implement a 3:1 habitat mitigation ratio.</p> <p>See Response I11-5, I11-6, and I11-7 above. The County appreciates the importance of mitigating potentially significant environmental effects associated with impacts to biological resources. The project's proposed biological open space easement and the project site are both situated within the Upper Carrizo Creek Watershed across similar topography, elevational range and vegetation communities. The project's proposed mitigation ratios are consistent with the requirements of the East County MSCP and were approved by County and CDFW biologists (County of San Diego 2008). As stated in Draft EIR Section 2.2, Biological Resources, the East County MSCP is still in process and has not been adopted. The Interim Review Process guides the process to ensure projects in planning before East County MSCP completion adhere to preserve design principles, including on-site open space of equal or higher conservation value compared to that being impacted, as well as maintaining habitat connectivity (County of San Diego 2021). Since the project is not regulated under the County's Biological Mitigation Ordinance (BMO), which applies only to land within the East County MSCP Boundary Map, the mitigation ratios in the BMO do not apply (BMO Section 86.502).</p> <p>As discussed in Section 2.2, Biological Resources, the project would include a 448-acre mitigation area which would reduce impacts to biological resources, including granitic northern mixed chaparral and granitic chamise chaparral, to less than significant. The County finds the open space easement implemented by M-BI-3 to be sufficient to address impacts to chaparral vegetation communities. As provided in California PRC Section 21002, CEQA does not require the adoption of additional mitigation measures for impacts already mitigated to a level that is less than significant. As such, potential impacts related to biological resources have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
111-35	<p>The commenter requests that the project should implement on-site habitat restoration within the same ecosystem and watershed as the project site.</p> <p>See Response I11-5. Additionally, the proposed biological open space easement would be within the same watershed as the project site and features similar vegetation communities as the project site. No changes to the EIR were determined to be necessary in response to this comment.</p>
111-36	<p>The commenter requests that all native plants should be salvaged and transplanted during construction.</p> <p>See Response I11-5 through I11-7 above. The project would only salvage and transplant special-status species, as required by the East County MSCP (County of San Diego 2008). Additionally, mitigation measures M-BI-4 and M-BI-13 would ensure viability of the transplanted and established individuals. Section 2.2, Biological Resources, of the Draft EIR specifies that impacts to biological resources, including native plant species, will be reduced to less than significant with the implementation of specified mitigation measures. As provided in California PRC Section 21002, CEQA does not require the adoption of additional mitigation measures for impacts already mitigated to a level that is less than significant. No changes to the EIR were determined to be necessary in response to this comment.</p>
111-37	<p>The commenter requests that the project should implement wildlife crossing infrastructure.</p> <p>As discussed in Section 2.2, Biological Resources, the project would implement mitigation measure M-BI-12 which would reduce impacts to wildlife movement to less than significant:</p> <p><b>M-BI-12 Wildlife Corridor.</b> In order to comply with Figure 15 of the Biological Resources Report depicting wildlife corridors, a minor deviation must be provided and approved to reflect the project changes. Prior to approval of any plan in any phase, issuance of any permit, and prior to use of the premises in reliance of this permit, a minor deviation must be submitted and approved with updated plans to the San Diego County PDS. The Applicant shall submit updated plans to reflect Figure 15 or as deemed appropriate by the County of San Diego and all applicable Wildlife Agencies (as deemed by the County) and gain approval. PDS shall review and approve the minor deviation for compliance with this condition.</p> <ol style="list-style-type: none"> <li><b>Wildlife Corridor Access.</b> The project shall provide wildlife-friendly fencing to allow for wildlife moving within the project site.</li> </ol> <p>As provided in California PRC Section 21002, CEQA does not require the adoption of additional mitigation measures for impacts already mitigated to a level that is less than significant. No changes to the EIR were determined to be necessary in response to this comment.</p>
111-38	<p>The commenter requests that the project implement ongoing testing and monitoring of the groundwater wells within properties adjacent to the project site.</p>

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	<p>See Global Response GR-3, Groundwater Impacts. The County disagrees with the commenter’s assertion that additional mitigation related to hydrology and water quality is required. As provided in Section 2.4, Hydrology and Water Quality, the project would adopt mitigation measure M-HY-1, which implements flood control measures to reduce impacts associated with flood hazards and risk of pollutant release to less than significant. With regard to direct impacts to groundwater resources, and as discussed throughout the Draft EIR, the project would not rely on the use of groundwater wells as a water source. Water for the project would be purchased from the JCSD and imported to the project site by water trucks. The Project Facility Availability Water Agreement between JCSD and the applicant, dated June 28, 2022, has been included as Appendix Q to the Final EIR. As required by PDF-HY-2, the project would implement a Groundwater Mitigation Monitoring and Mitigation Plan for the JCSD wells. This project design feature would ensure that the project would not result in adverse impacts to the underground groundwater aquifers. For ease of reference, PDF-HY-2 states:</p> <p><b>Implementation of GMMP for JCSD.</b> To ensure nonpotable water purchased from the Jacumba Community Services District (JCSD) does not result in impacts to the aquifers accessed by JCSD’s nonpotable water production wells (Highland Center Well and Park Well), the Starlight Solar Developer will implement the Groundwater Mitigation Monitoring and Mitigation Plan (GMMP) for the Flat Creek watershed.</p> <p>A groundwater monitoring report will be completed by a Professional Geologist or Professional Engineer licensed in the state of California and will be submitted to County Planning and Development Services (PDS) annually no later than 28 days following the end of the calendar year. Groundwater monitoring reports should be submitted for 5 years after proposed project construction has commenced. After 5 years, County PDS should determine if continuous reporting is required based on the effects of groundwater extraction from the previous 5 years. The annual reports will include the following information:</p> <ul style="list-style-type: none"> <li>• Groundwater-level hydrographs and tabulated groundwater-level data for each accessible well in the groundwater-monitoring network</li> <li>• Tabulated groundwater production volumes from JCSD nonpotable wells</li> <li>• Documentation of any changes in well pumping or groundwater well conditions for wells in the groundwater-monitoring network</li> <li>• Documentation of groundwater-dependent habitat monitoring, if necessary, as described in the GMMP</li> </ul> <p>If the baseline groundwater levels at the wells included in the groundwater monitoring network are exceeded by 5 feet, County PDS will be notified via letter and email within 1 working day of the exceedance, or immediately after the exceedance is recognized. Additionally, if groundwater-level thresholds at the off-site wells are exceeded by their respective thresholds, pumping of JCSD nonpotable wells for the project will cease and County PDS will be notified via letter and email within 1 working day, or immediately after the exceedance is recognized.</p> <p>As stated above, the project would implement project design feature PDF-HY-2, which specifies that the County will determine if continuous groundwater monitoring and reporting is required based on the effects of groundwater extraction during the 5-year period after project construction has commenced. The County finds PDF-HY-2 sufficient to address groundwater monitoring requirements. As provided in California PRC Section 21002, CEQA does not require the adoption of additional mitigation measures for impacts already mitigated to a level that is less than significant. As such, potential impacts related to groundwater have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
111-39	<p>The commenter requests that the project should implement rainwater harvesting and on-site stormwater infiltration systems.</p> <p>As described in Section 2.4, Hydrology and Water Quality, of the Draft EIR, construction in California that disturbs 1 or more acres of land surface is required to comply with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2009-0009-DWQ (as amended by Order No. 2010-0014- DWQ and 2012-006-DWQ). As such, the project would be required to comply with the NPDES CGP, which includes the incorporation of best management practices (BMPs) to reduce erosion and sedimentation. These BMPs may include incorporation of vegetated swales, setbacks and buffers, rooftop and impervious surface disconnection, bioretention cells, rain gardens, rain cisterns, and other actions or structures that would increase on-site infiltration. The applicant would submit a Notice of Intent to the State Water Resources Control Board and obtain coverage under, and comply with, the CGP. The preparation of a stormwater pollution prevention plan (SWPPP) would be required in accordance with the CGP. No changes to the EIR were determined to be necessary in response to this comment.</p>
111-40	<p>The commenter requests that the applicant should be legally bound to restore or replace any impacted private wells.</p> <p>The project does not propose the use of any on-site wells and would therefore not result in drawdown of the local groundwater aquifer or affect nearby private wells. No changes to the EIR were determined to be necessary in response to this comment.</p>

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I11-41	<p>The commenter requests that the project implement strategies to increase groundwater recharge to offset impacts to the local groundwater aquifer.</p> <p>See Global Response GR-3, Groundwater Impacts. The project does not propose the use of on-site wells and would therefore not result in drawdown of the local groundwater aquifer. Further, the project would not result in a significant increase in impervious surfaces or significantly alter the existing drainage pattern of the project site. As such, the project would not result in impacts related to groundwater recharge. The project would import nonpotable water for construction and fire suppression purposed from the JCSD and would implement a GMMP for the JCSD groundwater wells, which would ensure that the project would not result in significant impacts to the local groundwater aquifer. No changes to the EIR were determined to be necessary in response to this comment.</p>
I11-42	<p>The commenter requests that the project construct an on-site emergency response facility to address potential battery fires.</p> <p>See Global Response GR-5, Wildfire Risk. As discussed in Section 2.7, Wildfire, of the Draft EIR, the project has the potential to increase wildfire ignition risk at the project site. However, with the incorporation of mitigation measures M-WF-1, M-WF-2, M-WF-3, M-WF-4, M-WF-5, and M-WF-6, as well as required compliance with state and local regulations, these impacts would be reduced to less than significant. M-WF-1 requires the implementation of numerous risk reduction measures to ensure adequate fire mitigation, internal project site access, and safety during construction, operation, and decommissioning activities. M-WF-2 would require the implementation and maintenance of Fuel Modification Zones, which would reduce wildfire risks during project operations. M-WF-3 requires the incorporation of safety measures that would reduce fire risk at the BESS and would reduce the spread potential from a fire starting in the BESS. M-WF-4 requires the implementation of a Construction FPP, which would reduce wildfire ignition risk during construction and decommissioning activities. M-WF-5 outlines precautions during elevated weather conditions to minimize the potential of uncontrolled spread of a wildfire. Lastly, M-WF-6 requires the Applicant to enter into a Fire Protection and Mitigation Agreement with the SDCFPD to make a fair share contribution toward local emergency response capabilities (see Appendix P, Draft Fire Services Agreement, of the Draft EIR). These measures are consistent with the recommendations of the comprehensive FPP and applicable fire codes (see Appendix L, Fire Protection Plan). With these safeguards in place, the potential for a wildfire resulting from thermal runaway in the BESS is considered to be low. The County finds the mitigation measures included in the Draft EIR to be sufficient to address wildfire impacts. As provided in California PRC Section 21002, CEQA does not require the adoption of additional mitigation measures for impacts already mitigated to a level that is less than significant. As such, potential impacts related to wildfire have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
I11-43	<p>The commenter requests that the project install fireproof barriers around all battery storage areas and inert gas fire suppression systems for all electrical equipment.</p> <p>See Global Response GR-5, Wildfire Risks. As discussed in Chapter 1.0, Project Description, Location, and Environmental Setting, the BESS facilities included in the proposed project would use lithium iron phosphate batteries. Lithium iron phosphate batteries have higher thermal stability and a higher thermal runaway threshold than lithium manganese cobalt batteries. As a result, lithium iron phosphate batteries are inherently safer with a lower risk of thermal runaway as compared to lithium manganese cobalt or traditional lithium-ion batteries (Evro et al. 2024).</p> <p>As detailed in the Construction FPP, each battery storage cabinet would have a metal frame with insulation, air conditioning, and fire suppression, with separate enclosures for the electronic controls, inverters, and rectifiers. There would be a built-in heat detection and fire protection system and a fire extinguishing system. The heat and fire detection system would be linked to an automatic inert gas suppression system within each cabinet. The containers would also have an interior aerosol fire suppression system. The NFPA has developed a new Standard for the Installation of Stationary Energy Storage Systems (NFPA 855). This standard addresses the design, construction, installation, commissioning, operation, maintenance, and decommissioning of stationary energy storage systems. The system would be designed in accordance with applicable NFPA safety standards. The BESS would be sited with a setback from off-site areas as a buffer against potential wildfire ignitions. The cabinets would not be walk-in containers; thus, the battery storage cabinets would be non-habitable structures per the state and local fire codes that are in place at the time a building permit application is submitted to the County. The County finds the mitigation measures included in the Draft EIR to be sufficient to address wildfire impacts. As provided in California PRC Section 21002, CEQA does not require the adoption of additional mitigation measures for impacts already mitigated to a level that is less than significant. As such, potential impacts related to wildfire have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
I11-44	<p>The commenter requests that the project should include emergency access roads consistent with the County Fire requirements.</p> <p>See Response I11-13 above. Access to the project site would be provided via Jewel Valley Road. The site entrance would feature a manual swing gate and a sign with a lighted directory map and contact information. Additionally, emergency fire access would be provided via Tule Jim Lane which would feature a 24-foot gate. All entrance gates would feature fire authority-approved strobe light activation and a Knox Box key-operated</p>

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	<p>switch to allow ease of access for emergency service providers. All internal access road surfaces within the project site would meet Class II road specifications and would be consistent with all SDCFPD requirements. Regarding emergency response, Section 2.7, Wildfire, of the Draft EIR addresses Emergency Response and Evacuation Plans in detail. The Draft EIR concludes that the project would result in a less-than-significant impact related to impairing implementation of an adopted emergency response plan or emergency evacuation plan or conflicts with the Safety Element of the General Plan. No changes to the EIR were determined to be necessary in response to this comment.</p>
111-45	<p>The commenter requests that the project should install sound barriers along property lines adjacent to existing residences, use the quietest available inverter and cooling system technology, and establish noise monitoring and reporting stations.</p> <p>As provided in Section 2.5, Noise, and the Noise Analysis Report prepared for the proposed project (Appendix J.1), a noise measurement survey of the existing ambient noise environment consisting of a series of sound level measurements was conducted at nine locations in the project area on June 8, 2022 (see Figure 2.5-1). The measured sound levels in the project area ranged from approximately 30 dBA Leq to 43 dBA Leq (see Table 2.5-2). Based on the modeling results, noise levels at the project boundary would range up to 37 dBA Leq at the property line corner closest to the BESS area. Therefore, noise levels would comply with County Noise Ordinance Section 36.404 and would not exceed the "rural noise standards" of 50 dBA from 7:00 a.m. to 10 p.m. and 45 dBA from 10:00 p.m. to 7:00 a.m. As provided in State CEQA Guidelines Section 21002, CEQA does not require the adoption of mitigation measures that will not avoid or substantially lessen significant environmental impacts. Furthermore, the Draft EIR adopts mitigation measures M-N-1 and M-N-2 to reduce impacts associated with operational and construction-related noise to less than significant, as provided in Section 2.5, Noise. Therefore, no additional mitigation is warranted because the Draft EIR already adopts mitigation measures to reduce impacts associated with noise.</p>
111-46	<p>The commenter requests that the project should install air quality monitor equipment throughout the project site.</p> <p>As provided in Section 3.1.1, Air Quality, and the Air Quality and Greenhouse Gas Technical Report prepared for the proposed project (Appendix H.1), the annual, daily, and hourly construction-related air pollutant emissions would not exceed any of the applicable San Diego Air Pollution Control District (SDAPCD) significance thresholds (see Table 3.1.1-5, Table 3.1.1-6, and Table 3.1.1-7). The project would also incorporate dust control practices which would minimize PM<sub>10</sub> and PM<sub>2.5</sub> emissions. The short-term construction emissions dispersed over a wide area would not expose sensitive receptors to substantial pollutant concentrations. Additionally, operational emissions of the project would be minimal and therefore, would not expose sensitive receptors to substantial pollutant concentrations. As such, the project would result in less-than-significant impacts related to air quality without mitigation. As provided in State CEQA Guidelines Section 21002, CEQA does not require the adoption of mitigation measures that will not avoid or substantially lessen significant environmental impacts. Therefore, potential impacts related to air quality have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
111-47	<p>The commenter requests that the project should establish a \$10 million Community Projection Fund to address impacts to property values, infrastructure, emergency services, and implement environmental monitoring.</p> <p>The draft EIR includes mitigation measure M-WF-6 which requires the Applicant to enter into a Fire Protection and Mitigation Agreement with the SDCFPD to make a fair share contribution toward local emergency response capabilities (see Appendix P):</p> <p><b>M-WF-6: Fire Protection and Mitigation Agreement.</b> As a condition to providing service and pursuant to the Safety Element of the General Plan, the Applicant shall enter into a Fire Protection and Mitigation Agreement with the San Diego County Fire Protection District (SDCFPD) prior to approval of a Major Use Permit to make a fair share contribution toward local emergency response capabilities. The funding shall be used by the SDCFPD to mitigate risks of wildfires and to enhance fire suppression and emergency services capabilities for the proposed project and the southeast portion of CSA 135.</p> <p>As discussed in Global Response GR-7, Non-Substantive Comments, property value impacts are outside of the scope of CEQA. The Draft EIR adequately assesses the project's potential environmental impacts related to the maintenance of emergency services. Guidelines Section 21002, CEQA does not require the adoption of additional mitigation measures that will not avoid or substantially lessen significant environmental impacts. No changes to the EIR were determined to be necessary in response to this comment.</p>
111-48	<p>The commenter requests that the project should be required to reserve 25% of all power generated by the project for use by local residents at below-market rates.</p> <p>This is not a comment on the environmental impact analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment. A copy of this comment letter will be included in the Final EIR, which will be provided to the County Board of Supervisors for review when the project is considered for approval. See Global Response GR-7, Non-Substantive Comments.</p>

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I11-49	<p>The commenter requests that the project should be required to provide road improvements and maintenance. Road improvements and maintenance would not be included in the proposed project. As discussed in Section 3.1.9, project trips during construction would be temporary. During operations, the trips would be minimal. Cumulative energy projects in the area would also generate trips during construction that would be temporary and short-term. As required by PDF-TR-1, the Applicant is required by the County to develop a Traffic Control Plan (TCP) to provide safe and efficient traffic flow in the area and on the project site prior to and during construction. For ease of reference, PDF-TR-1 states:</p> <p><b>Traffic Control Plan.</b> Prior to obtaining a grading permit from the County of San Diego, the Applicant will implement a construction Traffic Control Plan (TCP) that includes the following measures:</p> <ol style="list-style-type: none"> <li>1. Temporary traffic control devices in accordance with the California Department of Transportation's (Caltrans) California Manual on Uniform Traffic Control Device to identify locations/sections where construction is ongoing. This may include slow-moving-vehicle warning signs, signage to warn of merging trucks, barriers for separating construction and non-construction traffic, use of traffic control flaggers, and any additional measures required for the sole convenience of safely passing non-construction traffic (including transit, bicyclists, and pedestrians) through and around construction areas.</li> <li>2. Coordination with Caltrans to secure the necessary encroachment and trip permits necessary for specialized haul trucks. Also, any excessive height/length vehicles should use pilot car services to provide safe over-the-road operations and overhead height warnings, if necessary.</li> <li>3. Notification of the California Highway Patrol, if necessary, to facilitate slowing freeway traffic to ensure safe access for motorists.</li> <li>4. Coordination with Caltrans, California Highway Patrol, and County officials, including the Sheriff's department. For the State Highway System, Caltrans requires a TCP to be submitted to District 11's Transportation Permits Issuance Branch at least 30 days prior to the start of any construction.</li> <li>5. Employment of a contract transport company that will be responsible for surveying the route to determine how turns on existing roads will be accomplished and ensuring that is reflected in the TCP.</li> <li>6. Establishment of procedures for coordinating with local emergency response agencies to ensure dissemination of information regarding emergency response vehicle routes affected by construction activities.</li> </ol> <p>The TCP would be prepared in consultation with the County and would contain project-specific measures for noticing, signage, policy guidelines, and the limitation of lane closures to off-peak hours. Therefore, potential impacts related to traffic have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
I11-50	<p>The commenter requests that the project should be required to fund independent environmental compliance monitoring for the entire project duration.</p> <p>The project would be required to fund and implement all mitigation measures included in the Draft EIR. Guidelines Section 21002, CEQA does not require the adoption of additional mitigation measures that will not avoid or substantially lessen significant environmental impacts. No changes to the EIR were determined to be necessary in response to this comment.</p>
I11-51	<p>The commenter requests that the project should implement a wildfire and habitat monitoring program with public reporting for 25 years and monitor soil health across the project site.</p> <p>See Response I11-6 above. As discussed in Section 2.2, Biological Resources, of the Draft EIR, the project would be required to implement mitigation measure M-BI-4 which would require the preparation of a resource management plan for the off-site mitigation area. For ease of reference the full text of M-BI-4 is provided as follows:</p> <p><b>M-BI-4 Resource Management Plan (RMP).</b> To provide for the long-term management of the proposed off-site biological open space easements, an RMP will be prepared and implemented (Appendix K). The final RMP cannot be approved until the following has been completed to the satisfaction of the Director of PDS as follows:</p> <ol style="list-style-type: none"> <li>1. The plan will be prepared and approved pursuant to the most current version of the County's Report Format and Content Requirements for Biological Resources (County of San Diego 2010b).</li> <li>2. The habitat land to be managed will be owned by a land conservancy or equivalent.</li> <li>3. Open space easements will be dedicated to the County in perpetuity, unless conveyed to another public agency subject to approval by the Director of PDS.</li> <li>4. A resource manager will be selected and approved, with evidence provided demonstrating acceptance of this responsibility.</li> </ol>

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	<p>5. The RMP funding mechanism to fund annual costs for basic stewardship shall be identified and approved by the County. The RMP funding mechanism will be identified and adequate to fund annual costs for implementation; typically determined by a Property Analysis Record as a non-wasting endowment.</p> <p>6. A contract between the Applicant and County will be executed for the implementation of the RMP.</p> <p>7. The final RMP shall have project-specific requirements for the following mitigation implementation and monitoring measures:</p> <ol style="list-style-type: none"> <li>a. Special-status plant species mitigation</li> </ol> <p>8. Goals: The final RMP will accomplish the following:</p> <ol style="list-style-type: none"> <li>a. Preserve and manage lands to the benefit of the flora, fauna, and native ecosystem functions reflected in the natural communities occurring within the biological open space.</li> <li>b. Provide 2:1 replacement of Jacumba milkvetch, long-spined spineflower, and Tecate tarplant, and 1:1 replacement of sticky geraea and desert beauty per the attached Conceptual Revegetation Plan (Appendix L of the Biological Resources Report). If Jacumba milkvetch, long-spined spineflower, Tecate tarplant, sticky geraea, and desert beauty are transplanted or established from seed collected from individuals within the project footprint, then success of this Mitigation Program will be achieved for Phase I when at least 292 Jacumba milkvetch, 336 sticky geraea, and 769 desert beauty are documented within the off-site biological open space easement during 1 or more years in the 3-year monitoring period. Similarly, success of the Mitigation Program will be achieved for Phase II when 2,104 Jacumba milkvetch, 100 long-spined spineflower, 856 Tecate tarplant, 1,042 sticky geraea, and 74 desert beauty are documented within the open space.</li> </ol> <p><b>Documentation:</b> The Applicant shall prepare an RMP and submit it to PDS and pay all applicable review fees.</p> <p><b>Timing:</b> <del>In each phase, prior to approval of any grading and/or improvement plans and issuance of any grading or construction permits</del> <del>Prior to approval of any plan or issuance of any permit for each phase, and prior to use of the premises in reliance on this permit,</del> the RMP shall be approved.</p> <p><b>Monitoring:</b> The PDS shall review the RMP for compliance with the content guidelines, the conceptual RMP, and this condition.</p> <p>The County finds the mitigation measures included in the Draft EIR to be sufficient to address impacts to biological resources. As provided in California PRC Section 21002, CEQA does not require the adoption of additional mitigation measures for impacts already mitigated to a level that is less than significant. As such, potential impacts related to biological resources have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
111-52	<p>The commenter requests that an archaeological monitor should be present during all construction activities.</p> <p>As discussed in Section 2.3, Cultural Resources, the project would be required to implement mitigation measure M-CR-3 (Archaeological and Native American Monitoring) which would require the presence of an archaeological monitor during all construction activities. No changes to the EIR were determined to be necessary in response to this comment.</p>
111-53	<p>The commenter requests that the project should include dark sky compliant light fixtures.</p> <p>The proposed lighting fixtures would only be installed at the gated entrances around the perimeter of the project site and would consist of motion-activated low-pressure sodium bulbs. As discussed throughout the EIR, the lighting would be required to comply with the San Diego County Light Pollution Code, also known as the Dark Sky Ordinance. As stated in Chapter 1.0, Project Description, Location, and Environmental Setting:</p> <p>All lighting would have bulbs that do not exceed 100 watts or equivalent, and all lights would be shielded, directed downward, and would comply with the County Light Pollution Code (County Code Sections 51.201–51.209), also known as the Dark Sky Ordinance. Outdoor lighting circuits would incorporate dusk-to-dawn photocell controllers, occupancy sensors, and/or switches as appropriate. Additionally, lighting for the project would be designed in accordance with the County Zoning Ordinance, Sections 6320, 6322, and 6324, which guide performance standards for glare, and controls excessive or unnecessary outdoor light emissions (County of San Diego 2012).</p> <p>As concluded in Section 2.1, Aesthetics, the proposed project would not result in any significant impacts related to lighting. Any impacts to nighttime light pollution would be minimized as the lighting fixtures would motion-activated and would adhere to the lighting requirements in the County Zoning Code. Therefore, potential impacts related to lighting have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>

Comment No.	Response
I11-54	<p>The commenter requests that the project should phase construction activities to avoid overlap with other nearby projects.</p> <p>Phase I and Phase II of the project would be constructed separately. Construction of Phase I would occur over approximately 12 months, and Phase II would occur over approximately 18 months. It is anticipated there would be approximately a 1-year gap between construction of Phase I and Phase II. Section 1.7 in Chapter 1.0, Project Description, Location, and Environmental Setting, of the Draft EIR includes a list of related projects in the surrounding area (see Table 1-4 and Figure 1-13). Each environmental resource topic in the Draft EIR includes a discussion of potential cumulative impacts of the project and the related projects. As discussed in Global Response GR-2, Cumulative Impacts, two new projects have been added to the proposed project's cumulative analysis. However, the cumulative impacts of the project have not changed with the addition of these projects. No changes to the EIR were determined to be necessary in response to this comment.</p>
I11-55	<p>The commenter requests that the County should require regional traffic mitigation for all approved projects. See Response I11-49 above. No changes to the EIR were determined to be necessary in response to this comment.</p>
I11-56	<p>The commenter requests that the County should establish maximum construction workforce limits for Boulevard.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not required and no changes to the EIR were determined to be necessary in response to this comment. However, for informational purposes, it should be noted that construction would employ approximately 75 workers per day during the peak construction period for Phase I and 210 workers per day during the peak construction period for Phase II. In addition to this direct labor workforce, approximately 10 to 15 additional workers at the site would engage in supervision, contract services, administration, and other non-direct labor activities. Local hires would be encouraged and engaged where feasible. No changes to the EIR were determined to be necessary in response to this comment.</p>
I11-57	<p>The commenter requests that the County should implement unified environmental monitoring for all regional utility-scale renewable energy projects.</p> <p>As discussed in Global Response GR-2, Cumulative Impacts, the County previously looked into doing broader renewable energy planning through its Renewable Energy Work Plan (2013–2014) and determined that a program-level study was not necessary. Since that time, renewable projects have been reviewed individually with the level of CEQA analysis appropriate for each proposal. A new programmatic review would not add value or meet a specific CEQA need at this stage. No changes to the EIR were determined to be necessary in response to this comment.</p>
I11-58	<p>This comment concludes the letter and requests that the Board of Supervisors deny the proposed project. A copy of this comment letter will be included in the Final EIR, which will be provided to the County Board of Supervisors for review when the project is considered for approval. No changes to the EIR were determined to be necessary in response to this comment.</p>

**From:** Matt Spencer <matt@sdcm.com>  
**To:** "Nicholas.Koutoufidis1@sdcounty.ca.gov"  
<Nicholas.Koutoufidis1@sdcounty.ca.gov>  
**Subject:** [External] Public Comment in OPPOSITION to Starlight Solar Project  
**Date:** Mon, 15 Sep 2025 16:15:34 +0000

Dear Nicholas Koutoufidis and Members of the San Diego County Planning Commission,

I am writing to request that the Major Use Permit for the Starlight Solar Project be DENIED. As a Boulevard property owner, I am deeply concerned about this 588-acre industrial facility that would destroy the natural resources and rural character of Boulevard, disproportionately burdening our small, rural community while failing to provide equitable climate solutions.

I12-1

Visual and Community Impacts: The DEIR acknowledges significant and unmitigated visual impacts. Over 235,000 solar panels, barbed-wire fencing, massive batteries, and 50-foot poles would permanently industrialize the desert landscape many chose to call home, degrading our property values, the rural character we bought our property for, and the scenic views that define our community.

I12-2

Ecological Destruction: The project would clear 561 acres of pristine chaparral that we Boulevard residents cherish, fragment wildlife corridors that define our landscape, and worsen local temperatures through the heat island effect. Off-site mitigation cannot replace the ecosystem functions, water recharge, and habitat connectivity that make our home special.

I12-3

Environmental Injustice: Boulevard, with only 410 residents, already hosts multiple energy projects and is becoming an industrial "sacrifice zone. We have no municipal government or resources to counter powerful developers, forcing us to absorb cumulative impacts of projects that primarily benefit urban consumers while we bear the costs.

I12-4

Public Safety: The 217 MW battery system presents fire risks that our

I12-5

rural firefighters cannot manage. Clear-cutting chaparral will increase, not reduce, fire danger in our neighborhood by removing natural firebreaks and soil-stabilizing vegetation that currently protect our homes.

I12-5  
(cont'd)

Noise and Water Impacts: Continuous industrial noise will disrupt the quiet environment that drew us to Boulevard, while construction and soil compaction may lead to reduced recharge and threaten our private wells in a region where we already face water scarcity challenges.

I12-6  
I12-7

Misguided Climate Policy: Utility-scale solar in rural areas like ours shifts the burden to low-income communities while allowing urban areas to avoid conservation. Real climate justice requires distributed solar, efficiency, and urban siting of renewable energy - not sacrificing our community.

I12-8

Planning and Legal Concerns: The DEIR fails to adequately analyze cumulative impacts on our community, distributed alternatives, or consistency with CEQA's environmental justice mandate and our area's Rural Lands designation.

I12-9

The Starlight Solar Project would destroy the natural resources visitors and residents enjoy, endanger our public safety, and impose disproportionate costs on our vulnerable community while offering no local benefit to those who actually live in the community.

I12-10

I respectfully request that the Commission:

1. DENY the Major Use Permit.
2. Prioritize distributed, urban-based renewable energy.
3. Require true cumulative impact analysis and enforce environmental justice standards.
4. If approval is nonetheless considered, I request:

1. Residential well monitoring
2. 300 ft set back from roads and property lines
- 3.

I12-11  
I12-12  
I12-13

Underground the overhead powerlines

4.

Construct earth barriers planted with native vegetation along the fence line

5.

Reduce the footprint of the project to reduce the visual impact.

6. Require the developer to compensate the community with clearly defined resilience benefits as a mandatory condition of approval.

True climate action requires climate justice. Sacrificing our rural Boulevard community for urban energy needs is not acceptable.

Respectfully,  
Matthew Spencer

↑ I12-13  
(cont'd)

I12-14

I12-15

I12-16

I12-17

**Attached Images:**



**MATT SPENCER**  
OWNER & OPERATOR

619.857.2100 | MATT@SDCM.COM | SDCM.COM



### 8.2.5.12 Response to Comment Letter I12 from Matt Spencer (received September 15, 2025)

Comment No.	Response
I12-1	<p>The commenter introduces the letter and expresses their opposition to the proposed project. The commenter believes that the proposed project would result in significant impacts to the local community which would outweigh the potential benefits.</p> <p>Responses to the specific comments in the letter are provided below. No changes to the EIR were determined to be necessary in response to this comment.</p>
I12-2	<p>The commenter states that the proposed project would result in permanent visual impacts.</p> <p>See Global Response GR-1, Visual Impacts. The County appreciates the commenter's concern regarding visual impacts. As discussed in the Draft EIR, the project would result in significant and unavoidable impacts to visual resources. Specifically, as detailed in Section 2.1, Aesthetics, the project would result in significant impacts related to Visual Character and Quality (Impact AE-1), Valued Visual Character and Image of Neighborhood or Community (Impact AE-2), and Focal and Panoramic Vistas (Impact AE-3). No feasible mitigation measures have been identified to reduce the visual impacts of the project to a less than significant level. CEQA does not require the adoption of infeasible mitigation measures or mitigation measures that would not avoid or lessen significant environmental impacts. Here, the County has determined that no feasible mitigation measure, including increased buffer distance, would reduce visual impacts to a level that is less than significant. As such, if the proposed project is approved, the County will prepare a Statement of Overriding Considerations, as required by CEQA Guidelines Section 15093. The comments received on the Draft EIR will be included in the project's administrative record and presented to the Board of Supervisors (Board) for review. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I12-3	<p>The commenter states that the 448-acre biological open space easement would not adequately address the biological impacts of the project.</p> <p>The County appreciates the commenter's concern regarding mitigation of biological impacts. According to the San Diego County Biological Mitigation Ordinance, mitigation may be "out-of-kind" if the mitigation bank is located within the East County Multiple Species Conservation Program (MSCP) Subarea (County of San Diego 2010). Mitigation must be "in-kind" for the following vegetation types: Southern Maritime Chaparral, Maritime Succulent Scrub, and Wetlands. As discussed in Section 2.2, Biological Resources, of the Draft EIR, the project would be required to provide mitigation for 347.25 acres of habitat in accordance with the County's required mitigation ratios. As such, the 448-acre mitigation area would exceed the required acreage of habitat mitigation and would reduce impacts to less than significant. The County finds the open space easement implemented by M-BI-3 to be sufficient to address impacts to chaparral vegetation communities. As provided in California Public Resources Code (PRC) Section 21002, CEQA does not require the adoption of additional mitigation measures for impacts already mitigated to a level that is less than significant. As such, potential impacts related to biological resources have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
I12-4	<p>The commenter states that the project would result in environmental justice impacts to the local community, and that Boulevard lacks the resources to adequately oppose developments like the proposed project.</p> <p>See Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice. CEQA does not specifically reference "environmental justice," nor does it require analysis of environmental justice concerns (see <i>Golden Door Properties, LLC v. County of San Diego</i> (2020) 50 Cal.App.5th 467, 555 n.46). Instead, CEQA focuses on evaluating potentially significant environmental impacts, including those that are cumulatively considerable. Traditionally, environmental justice issues pertain to the effects of pollution on low-income communities (California Department of Justice 2012). Additionally, under the County of San Diego's General Plan, the community of Boulevard was not designated as an Environmental Justice community in the County. As described in Global Response GR-6, comments related to social and economic issues do not specifically relate to the environmental analysis included in the Draft EIR. This response is provided for informational purposes and will be considered by the Board during the project approval process and will be made available through publication of this Final EIR. These comments do not warrant revisions to the Draft EIR.</p>
I12-5	<p>The commenter expresses concern that the introduction of a new energy storage facility would increase wildfire risk due to the potential for fire caused by battery failure at the project site.</p> <p>See Global Response GR-5, Wildfire Risks. As discussed in Chapter 1.0, Project Description, Location, and Environmental Setting, the BESS facilities included in the proposed project would use lithium iron phosphate batteries. Lithium iron phosphate batteries have higher thermal stability and a higher thermal runaway threshold than lithium manganese cobalt batteries. As a result, lithium iron phosphate batteries are inherently safer with a lower risk of thermal runaway as compared to lithium manganese cobalt or traditional lithium-ion batteries (Evro et al. 2024).</p>

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	<p>As detailed in the Construction Fire Protection Plan (FPP), each battery storage cabinet would have a metal frame with insulation, air conditioning, and fire suppression, with separate enclosures for the electronic controls, inverters, and rectifiers. There would be a built-in heat detection and fire protection system and a fire extinguishing system. The heat and fire detection system would be linked to an automatic inert gas suppression system within each cabinet. The containers would also have an interior aerosol fire suppression system. The National Fire Protection Association (NFPA) has developed a new Standard for the Installation of Stationary Energy Storage Systems (NFPA 855). This standard addresses the design, construction, installation, commissioning, operation, maintenance, and decommissioning of stationary energy storage systems. The system would be designed in accordance with applicable NFPA safety standards. The BESS would be sited with a setback from off-site areas as a buffer against potential wildfire ignitions. The cabinets would not be walk-in containers; thus, the battery storage cabinets would be non-habitable structures per the state and local fire codes that are in place at the time a building permit application is submitted to the County.</p> <p>The Draft EIR concludes that, with the incorporation of M-WF-1 through M-WF-6, the project would not exacerbate the risk of fire ignition at the project site; therefore, environmental impacts were determined to be less than significant. Potential environmental impacts associated with wildfire have been adequately assessed in the Draft EIR, and no new significant environmental issues have been identified. State CEQA Guidelines Section 15088(a) does not require a response to comments that do not raise significant environmental issues. Therefore, no revisions to the Draft EIR are necessary.</p>
112-6	<p>The commenter expresses concern regarding the noise impacts of the proposed project.</p> <p>The County appreciates the commenter's concern regarding noise impacts. As provided in Section 2.5, Noise, and the Noise Analysis Report prepared for the proposed project (Appendix J.1), a noise measurement survey of the existing ambient noise environment consisting of a series of sound level measurements was conducted at nine locations in the project area on June 8, 2022 (see Figure 2.5-1). The measured sound levels in the project area ranged from approximately 30 A-weighted decibels (dBA) continuous sound level (Leq) to 43 dBA Leq (see Table 2.5-2). Based on the modeling results, noise levels at the project boundary would range up to 37 dBA Leq at the property line corner closest to the battery energy storage system (BESS) area. Therefore, noise levels would comply with County Noise Ordinance Section 36.404 and would not exceed the "rural noise standards" of 50 dBA from 7:00 a.m. to 10 p.m. and 45 dBA from 10:00 p.m. to 7:00 a.m. As shown on Figure 1-13 in Chapter 1.0, Project Description, Location, and Environmental Setting, with the exception of the Tule Wind Groundwater Permitting Project, all of the past, present, and reasonably anticipated future projects in the project area would be several miles away from the project site. Due to the attenuation of noise over large distances, it would not be expected that the noise generated during operation of the project would contribute to any cumulative noise impacts. Furthermore, the Draft EIR adopts mitigation measures M-N-1 and M-N-2 to reduce impacts associated with operational and construction-related noise to less than significant. Therefore, potential impacts related to noise have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
112-7	<p>The commenter expresses concern regarding that the project would reduce groundwater recharge of the local groundwater aquifer.</p> <p>See Global Response GR-3, Groundwater Impacts. The project does not propose the use of any on-site wells and would therefore not result in drawdown of the local groundwater aquifer. Further, the project would not result in a significant increase in impervious surfaces or significantly alter the existing drainage pattern of the project site. As such, the project would not result in impacts related to groundwater recharge. The project would import nonpotable water for construction and fire suppression purposed from the Jacumba Community Services District (JCSD), and it would implement a Groundwater Monitoring and Mitigation Plan (GMMP) for the JCSD groundwater wells that would ensure that the project would not result in significant impacts to the local groundwater aquifer. No changes to the EIR were determined to be necessary in response to this comment.</p>
112-8	<p>The commenter states that cumulative impacts of the project in addition to related utility-scale renewable energy projects would result in disproportionate environmental impacts throughout region.</p> <p>The County has not specifically identified the communities of Boulevard or Jacumba for potential renewable energy development projects. However, the County's Regional Decarbonization Framework technical report notes that the Mountain Empire subregion of the County, which includes the communities of Boulevard and Jacumba, is particularly suitable to solar development due to climate of the area which leads to high solar irradiance, as well as proximity to existing transmission infrastructure (County of San Diego 2022). While these factors increase the favorability of solar development in the Boulevard-Jacumba area, they do not indicate that the County has preference or encourages proposed renewable projects to be developed in Boulevard or Jacumba as these factors are inherent to the existing conditions of the area. Additionally, under the County of San Diego's General Plan, the community of Boulevard was not designated as an Environmental Justice community in the County. As described in Global Response GR-6, comments related to social and economic issues do not specifically relate to the environmental analysis included in the Draft EIR. This response is provided for informational purposes and will be considered by the Board during the project approval process and will be made available through publication of this Final EIR. As discussed in Global Response GR-2, Cumulative Impacts, the request for the County to prepare a Program EIR related to utility-scale renewable</p>

Comment No.	Response
	<p>development in the Mountain Empire subregion of Eastern San Diego County, such level of analysis is not required by CEQA. CEQA only requires environmental review when there is a specific project or policy being proposed for approval. In this case, the County is not creating a new program or plan for renewable energy—individual projects will continue to be reviewed separately under existing policies and zoning. The County previously looked into doing broader renewable energy planning through its Renewable Energy Work Plan (2013–2014) and determined that a program-level study was not necessary. Since that time, renewable projects have been reviewed individually with the level of CEQA analysis appropriate for each proposal. A new programmatic review would not add value or meet a specific CEQA need at this stage. No changes to the EIR were determined to be necessary in response to this comment.</p>
112-9	<p>The commenter states that the Draft EIR inadequately addressed the cumulative impacts of the project in addition to related utility-scale renewable energy projects in the region and does not adhere to the environmental justice requirements of CEQA.</p> <p>Section 1.7 in Chapter 1.0, Project Description, Location, and Environmental Setting, of the Draft EIR includes a list of related projects in the surrounding area (see Table 1-4 and Figure 1-13). Each environmental resource topic in the Draft EIR includes a discussion of potential cumulative impacts of the project and the related projects. As discussed in Global Response GR-2, Cumulative Impacts, two new projects have been added to the proposed project's cumulative analysis. However, the cumulative impacts of the project have not changed with the addition of these projects.</p> <p>Regarding distributed alternatives, as discussed in Chapter 4.0, Project Alternatives, of the Draft EIR, an alternative location for the project would not be feasible. State CEQA Guidelines Section 15126.6(f)(1) lists several factors that may be considered when addressing feasibility of alternatives (any alternative, not just alternative locations) and states that “No one of these factors establishes a fixed limit on the scope of reasonable alternatives.” Specifically, an alternative site need not be considered when implementation is “remote and speculative,” such as when the alternative site is beyond the control of a project applicant (<i>Goleta Union School District v. Regents of University of California 1995</i>). No other readily available undeveloped parcels of comparable size exist in the eastern part of the County that could accommodate the project. Other sites have either already been evaluated and deemed unsuitable for similar solar development, lack sufficient access, are too distant from existing infrastructure, or are not available for acquisition by the applicant within a reasonable timeframe. As such, a feasible alternative site was not identified.</p> <p>Regarding Rural Lands, the County’s General Plan identifies that the project site is within the rural regional category and designates the project site as Rural Lands 80 (RL-80). The County’s Zoning Ordinance identifies the site as General Rural (S92). The project would be considered a Major Impact Service and Utility under Section 1355 of the Zoning Ordinance, which is an allowable use with the approval of a Major Use Permit (MUP). According to Section 1350 of the Zoning Ordinance, Major Impact Services and Utilities may be conditionally permitted in any zone if it is determined that public interest supersedes the usual limitations placed on land use and transcends the usual restraints of zoning for reasons of necessary location and community-wide interest. The MUP process considers the location, size, and operating characteristics of the proposed use and must find that the project would be compatible with adjacent uses with consideration given to the following: harmony in scale; availability of public facilities, services and utilities; effect on desirable neighborhood character; generation of traffic; and suitability of the site for type and intensity of use (Section 7358). The application for a MUP would be processed according to Section 7350 of the Zoning Ordinance, including making required findings pursuant to Section 7358. In accordance with Section 6954(b)(3), the project would be subject to requirements related to setbacks, height, visual, and security. The MUP would also be referred to the Boulevard Community Design Review Board, pursuant to Section 7355. Therefore, the project would be consistent with the County’s Zoning Ordinance.</p> <p>Additionally, see Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice. CEQA does not specifically reference “environmental justice,” nor does it require analysis of environmental justice concerns (see <i>Golden Door Properties, LLC v. County of San Diego (2020) 50 Cal.App.5th 467, 555 n.46</i>). Instead, CEQA focuses on evaluating potentially significant environmental impacts, including those that are cumulatively considerable. Traditionally, environmental justice issues pertain to the effects of pollution on low-income communities (California Department of Justice 2012). Additionally, under the County of San Diego’s General Plan, the community of Boulevard was not designated as an Environmental Justice community in the County. As described in Global Response GR-6, comments related to social and economic issues do not specifically relate to the environmental analysis included in the Draft EIR. This response is provided for informational purposes and will be considered by the Board during the project approval process and will be made available through publication of this Final EIR. No changes to the EIR were determined to be necessary in response to this comment</p>
112-10	<p>This comment summarizes the commenter’s concerns regarding the proposed project, as noted above, and requests that the Planning Commission deny the project.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not required and no changes to the EIR were determined to be necessary in response to this comment.</p>
112-11	<p>The commenter requests that the project should implement ongoing testing and monitoring of the groundwater wells surrounding the project site.</p>

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	<p>See Global Response GR-3, Groundwater Impacts. The County disagrees with the commenter’s assertion that additional mitigation related to hydrology and water quality is required. As provided in Section 2.4, Hydrology and Water Quality, the project would adopt mitigation measure M-HY-1, which implements flood control measures to reduce impacts associated with flood hazards and risk of pollutant release to less than significant. With regard to direct impacts to groundwater resources, and as discussed throughout the Draft EIR, the project would not rely on the use of groundwater wells as a water source. Water for the project would be purchased from the JCSD and imported to the project site by water trucks. The Project Facility Availability Water Agreement between JCSD and the applicant, dated June 28, 2022, has been included as Appendix Q to the Final EIR. As required by PDF-HY-2, the project would implement a Groundwater Mitigation Monitoring and Mitigation Plan for the JCSD wells. This project design feature would ensure that the project would not result in adverse impacts to the underground groundwater aquifers. For ease of reference, PDF-HY-2 states:</p> <p><b>Implementation of GMMP for JCSD.</b> To ensure nonpotable water purchased from the Jacumba Community Services District (JCSD) does not result in impacts to the aquifers accessed by JCSD’s nonpotable water production wells (Highland Center Well and Park Well), the Starlight Solar Developer will implement the Groundwater Mitigation Monitoring and Mitigation Plan (GMMP) for the Flat Creek watershed.</p> <p>A groundwater monitoring report will be completed by a Professional Geologist or Professional Engineer licensed in the state of California and will be submitted to County Planning and Development Services (PDS) annually no later than 28 days following the end of the calendar year. Groundwater monitoring reports should be submitted for 5 years after proposed project construction has commenced. After 5 years, County PDS should determine if continuous reporting is required based on the effects of groundwater extraction from the previous 5 years. The annual reports will include the following information:</p> <ul style="list-style-type: none"> <li>• Groundwater-level hydrographs and tabulated groundwater-level data for each accessible well in the groundwater-monitoring network</li> <li>• Tabulated groundwater production volumes from JCSD nonpotable wells</li> <li>• Documentation of any changes in well pumping or groundwater well conditions for wells in the groundwater-monitoring network</li> <li>• Documentation of groundwater-dependent habitat monitoring, if necessary, as described in the GMMP</li> </ul> <p>If the baseline groundwater levels at the wells included in the groundwater monitoring network are exceeded by 5 feet, County PDS will be notified via letter and email within 1 working day of the exceedance, or immediately after the exceedance is recognized. Additionally, if groundwater-level thresholds at the off-site wells are exceeded by their respective thresholds, pumping of JCSD nonpotable wells for the project will cease and County PDS will be notified via letter and email within 1 working day, or immediately after the exceedance is recognized.</p> <p>As stated above, the project would implement project design feature PDF-HY-2, which specifies that the County will determine if continuous groundwater monitoring and reporting is required based on the effects of groundwater extraction during the 5-year period after project construction has commenced. The County finds PDF-HY-2 sufficient to address groundwater monitoring requirements. As provided in California PRC Section 21002, CEQA does not require the adoption of additional mitigation measures for impacts already mitigated to a level that is less than significant. Potential impacts related to groundwater have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
112-12	<p>The commenter requests that the project should implement a 300-foot buffer from all property lines and roads. See Global Response GR-1 Visual Impacts. The project, as currently proposed, does not include a uniform 300-foot buffer between the proposed photovoltaic (PV) panels and adjacent properties and roads. Rather, the project includes a minimum buffer of 30 feet, between the proposed project components and the boundaries of the project site. Further, as shown in Figure 1-3 in Chapter 1.0 of the Draft EIR, the project boundaries do not fully encompass the entire footprint of the parcels in which the project is proposed, which greatly increases the buffer distances in some areas of the project site. For example, Area B would be located over 2,000 feet east of the adjacent parcel to the west, and Area E would be located over 200 feet west of the adjacent parcel to the east. Additionally, as shown in Figure 1-6 in Chapter 1.0 of the Draft EIR, the project contains 15 cultural open space easement areas of various sizes within the project site, totaling 24.44 acres. No development or disturbance would occur within the open space easement areas. The open space easements along the edges of the site would increase the distance of the project components from the nearest adjacent parcels by between 120 feet and 500 feet in some areas, including the northwestern and southwestern edges of Area A-2, as well as the southwestern corner of Area A-1. Further, it should be noted that most existing residences in the surrounding vicinity are substantially set back from their own property lines, which increases the distance between existing residences and the proposed project components. With the exception of the residence located 150 feet west of the project site (northwest of Area A-2), all other residences would be over 400 feet away from the proposed PV panels. No changes to the EIR were determined to be necessary in response to this comment.</p>

Comment No.	Response
112-13	<p>The commenter requests that the project should underground the proposed power lines crossing Tule Jim Lane.</p> <p>See Global Response GR-1 Visual Impacts. The project, as currently proposed, would not underground the entire proposed gen-tie line; however, only 100 feet of the approximately 3,500-foot-long gen-tie would be above ground. The primary reason for an overhead section crossing Tule Jim Lane is to avoid encroaching on an existing underground 138-kV transmission line in Tule Jim Lane that connects to the substation. Per Section 851 of the California Public Utilities Code, San Diego Gas &amp; Electric (SDG&amp;E) must obtain California Public Utilities Commission (CPUC) approval to ensure that a possible encroachment on their facilities or equipment is not adverse to public interest. The overhead section over the road eliminates the encroachment but not the requirement for SDG&amp;E to consult with the CPUC. Also, undergrounding the proposed gen-tie line at the Tule Jim Lane overcrossing would require a full road closure during project construction, which would severely limit access to the residences along Tule Jim Lane (traffic detours would not be feasible due to the lack of improved roads in the area). Further, the proposed gen-tie overcrossing would be visually consistent with the existing overhead power lines along Tule Jim Lane. CEQA does not require an EIR to consider alternatives that would improve a project's environmental baseline (see <i>In re Bay-Delta Programmatic Evt'l Impact Report (2008)</i> 43 Cal.4th 1143). Here, the issue is not the visual impact of overhead power lines, but whether the addition of a new overhead power line similar in form, line, color, and texture to existing overhead power lines will cause a significant new environmental impact. Therefore, the County disagrees with the commenters' assertion that undergrounding the gen-tie line at the Tule Jim Lane crossing is required because the overhead the gen-tie line would not introduce a new visual element to the area surrounding Tule Jim Lane, and it would not result in a significant new visual impact. No changes to the EIR were determined to be necessary in response to this comment.</p>
112-14	<p>The commenter requests that the project should construct earthen berms with native landscaping to screen the view of the proposed project components from nearby residences.</p> <p>See Global Response GR-1, Visual Impacts. The project, as currently proposed, would not include landscaping screening. As discussed in Section 2.1, Aesthetics, of the Draft EIR, installing landscaping around the entire project site for screening purposes would be infeasible, due to the high winds and arid conditions of the area. It would be highly unlikely that new vegetation would survive at a large enough scale (i.e., grow to maturity) to screen the entire project from nearby views. Pursuant to State CEQA Guidelines Section 21002.1(b), CEQA does not require the adoption of infeasible mitigation measures. Therefore, the County disagrees with the commenters' assertion that landscape screening must be installed around the entire project site. However, as discussed in PDF-AE-1, the Applicant will coordinate with the resident of any existing private residence located within a distance of 500 feet of a project solar panel installation to assess possible remedies, including financial assistance, for the installation of visual screening measures, including landscape screening. For ease of reference, PDF-AE-1 states:</p> <p style="padding-left: 40px;">The Applicant will coordinate with the resident of any existing (existing as of the date of this Major Use Permit Decision) private residence located within a distance of 500 feet of a project solar panel installation to assess visibility impact complaints made within 1 year from the initial operations date of the project. This assessment would include possible remedies that the Applicant may implement depending upon the level of visibility impacts occurring at the residence, including financial assistance for the installation of visual screening measures, such as landscaping or fencing. Requests for assistance can be made through a project hotline to be established by the Applicant and published on the Applicant's website.</p> <p>Therefore, through implementation of PDF-AE-1, some of the proposed project components would be screened from view. No changes to the EIR were determined to be necessary in response to this comment.</p>
112-15	<p>The commenter requests that the total footprint of the project should be reduced to minimize potential visual impacts.</p> <p>See Global Response GR-1, Visual Impacts. A reduced project footprint was considered in the Draft EIR. The project, as currently proposed, would include 588 acres of development. However, as discussed in Chapter 4.0, Project Alternatives, of the Draft EIR, the "Reduced Development Alternative" proposes to implement a smaller version of the project. Under the Reduced Development Alternative, the development footprint would be 538 acres, a reduction of 50 acres from the proposed project. This alternative would remove approximately 50 acres of solar arrays and infrastructure in the northern portion of the project (Areas A-1 and A-2). This reduction in the development footprint would remove solar arrays from the northern side of the ridgeline and provide a visual buffer between the proposed solar facility, Old Highway 80, I-8, and some of the off-site private properties. CEQA provides that the lead agency, in the Final EIR, may reject alternatives that do not satisfy project goals, do not offer substantial environmental advantages, or are infeasible given economic, environmental, or technological factors involved (see <i>Bay Area Citizens v. Association of Bay Area Governments (2016)</i> 248 Cal.App.4th 966).</p> <p>With respect to aesthetics, the Draft EIR provides an extensive analysis of potential impacts to aesthetic resources and states that no feasible mitigation measures have been identified to reduce the visual impacts of the Project to a less than significant level (see Section 2.1, Aesthetics). As stated above, CEQA does not require the adoption of infeasible mitigation measures or mitigation measures that would not avoid or lessen</p>

Comment No.	Response
	significant environmental impacts. Here, the County has determined that no feasible mitigation measure, including increased buffer distance, would reduce visual impacts to a level that is less than significant. No changes to the EIR were determined to be necessary in response to this comment.
I12-16	The commenter requests that the County should require the project applicant to provide community benefits as a part of the proposed project.  This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment. A copy of this comment letter will be included in the Final EIR, which will be provided to the County Board of Supervisors for review when the project is considered for approval. See Global Response GR-7, Non-Substantive Comments.
I12-17	This comment concludes the letter and emphasizes the commenter's opposition to the proposed project.  This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment. A copy of this comment letter will be included in the Final EIR, which will be provided to the Board of Supervisors for review when the project is considered for approval. Responses to the specific comments in the letter are provided below.

**From:** Chantaia Soleil <chantih@gmail.com>  
**To:** Nicholas.Koutoufidis1@sdcounty.ca.gov,  
joel.anderson@sdcounty.ca.gov  
**Subject:** [External] Public Comment on Starlight Solar Project EIR —  
Request for Downsizing and Stronger Protections  
**Date:** Mon, 15 Sep 2025 15:38:50 -0700

Dear Mr. Koutoufidis and Supervisor Anderson,

I am a Boulevard resident whose property line borders the proposed Starlight Solar Project area. While I support renewable energy in principle, the current proposal—covering 588 acres with 235,500 panels, a 100 MW solar field, and a 217 MW battery storage facility—poses unacceptable risks to our community’s safety, environment, and rural character.

I  
I13-1

The County’s own EIR acknowledges “a permanent, significant, and unavoidable impact to Boulevard’s rural character and visual quality.” To responsibly pursue clean energy while safeguarding our community, I urge you to:

- \* Require 500 ft setbacks from all property lines and roads.
- \* Bury overhead power lines at Tule Jim Lane to reduce fire hazards and visual blight.
- \* Require native landscaping around panel clusters to protect wildlife corridors.
- \* Mandate independent well testing and monitoring to safeguard our aquifer.
- \* Address fire risks posed by large-scale batteries and panels, which increase ignition danger.
- \* Reduce the project’s size so that visual impacts, noise, and light pollution remain manageable.

I I13-2  
I I13-3  
I I13-4  
I I13-5  
I I13-6  
I I13-7

Left unchecked, this project could increase wildfire risk, threaten our aquifer and wells, destroy wildlife habitat, raise local temperatures by 2–8°F, and lower property values. Downsizing and adding robust protections will help balance renewable energy development with the long-term health and safety of Boulevard’s land, water, and residents.

I  
I13-8

Thank you for your attention and for holding this project accountable to the community it affects most.

I113-9

Sincerely,  
Chanti Holroyd  
Boulevard Resident

### 8.2.5.13 Response to Comment Letter I13 from Chantail Soleil (received September 15, 2025)

Comment No.	Response
I13-1	<p>The commenter introduces the letter and expresses their opposition to the proposed project. The commenter goes on the state that while they support clean energy, they believe that the proposed project would result in significant impacts to the local community which would outweigh the potential benefits.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment. A copy of this comment letter will be included in the Final EIR, which will be provided to the Board of Supervisors for review when the project is considered for approval. Responses to the specific comments in the letter are provided below.</p>
I13-2	<p>The commenter requests that the project should implement 500-foot setbacks from all property lines and roads. See Global Response GR-1 Visual Impacts. The project, as currently proposed, does not include a uniform 500-foot buffer between the proposed photovoltaic (PV) panels and adjacent properties and roads. Rather, the project includes a minimum buffer of 30 feet, between the proposed project components and the boundaries of the project site. Further, as shown in Figure 1-3 in Chapter 1.0 of the Draft EIR, the project boundaries do not fully encompass the entire footprint of the parcels in which the project is proposed, which greatly increases the buffer distances in some areas of the project site. For example, Area B would be located over 2,000 feet east of the adjacent parcel to the west, and Area E would be located over 200 feet west of the adjacent parcel to the east. Additionally, as shown in Figure 1-6 in Chapter 1.0 of the Draft EIR, the project contains 15 cultural open space easement areas of various sizes within the project site, totaling 24.44 acres. No development or disturbance would occur within the open space easement areas. The open space easements along the edges of the site would increase the distance of the project components from the nearest adjacent parcels by between 120 feet and 500 feet in some areas, including the northwestern and southwestern edges of Area A-2, as well as the southwestern corner of Area A-1. Further, it should be noted that most existing residences in the surrounding vicinity are substantially set back from their own property lines, which increases the distance between existing residences and the proposed project components. With the exception of the residence located 150 feet west of the project site (northwest of Area A-2), all other residences would be over 400 feet away from the proposed PV panels. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I13-3	<p>The commenter requests that the project should underground the proposed power lines crossing Tule Jim Lane to reduce fire hazards and visual impacts.</p> <p>See Global Response GR-1 Visual Impacts. The project, as currently proposed, would not underground the entire proposed gen-tie line; however, only 100 feet of the approximately 3,500-foot-long gen-tie would be above ground. The primary reason for an overhead section crossing Tule Jim Lane is to avoid encroaching on an existing underground 138-kV transmission line in Tule Jim Lane that connects to the substation. Per Section 851 of the California Public Utilities Code, San Diego Gas &amp; Electric (SDG&amp;E) must obtain California Public Utilities Commission (CPUC) approval to ensure that a possible encroachment on their facilities or equipment is not adverse to public interest. The overhead section over the road eliminates the encroachment but not the requirement for SDG&amp;E to consult with the CPUC. Also, undergrounding the proposed gen-tie line at the Tule Jim Lane overcrossing would require a full road closure during project construction, which would severely limit access to the residences along Tule Jim Lane (traffic detours would not be feasible due to the lack of improved roads in the area). Further, the proposed gen-tie overcrossing would be visually consistent with the existing overhead power lines along Tule Jim Lane. CEQA does not require an EIR to consider alternatives that would improve a project's environmental baseline (see <i>In re Bay-Delta Programmatic Env't Impact Report</i> (2008) 43 Cal.4th 1143). Here, the issue is not the visual impact of overhead power lines, but whether the addition of a new overhead power line similar in form, line, color, and texture to existing overhead power lines will cause a significant new environmental impact. Therefore, the County disagrees with the commenter's assertion that undergrounding the gen-tie line at the Tule Jim Lane crossing is required because the overhead gen-tie line would not introduce a new visual element to the area surrounding Tule Jim Lane, and it would not result in a significant new visual impact. Additionally, undergrounding the gen-tie line at the proposed crossing would be infeasible as a means to reduce wildfire impacts given the encroachment issues discussed above. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I13-4	<p>The commenter requests that the project should require native landscaping around panel clusters to protect wildlife corridors.</p> <p>See Global Response GR-1, Visual Impacts. The project, as currently proposed, would not include landscaping screening. As discussed in Section 2.1, Aesthetics, of the Draft EIR, installing landscaping around the entire project site for screening purposes would be infeasible, due to the high winds and arid conditions of the area. It would be highly unlikely that new vegetation would survive at a large enough scale (i.e., grow to maturity) to screen the entire project from nearby views. Pursuant to California Public Resources Code (PRC) Section 21002.1(b), CEQA does not require the adoption of infeasible mitigation measures. Therefore, the County disagrees with the commenters' assertion that landscape screening must be installed around the entire project</p>

Comment No.	Response
	<p>site. However, as discussed in PDF-AE-1, the Applicant will coordinate with the resident of any existing private residence located within a distance of 500 feet of a project solar panel installation to assess possible remedies, including financial assistance, for the installation of visual screening measures, including landscape screening. For ease of reference, PDF-AE-1 states:</p> <p style="padding-left: 40px;">The Applicant will coordinate with the resident of any existing (existing as of the date of this Major Use Permit Decision) private residence located within a distance of 500 feet of a project solar panel installation to assess visibility impact complaints made within 1 year from the initial operations date of the project. This assessment would include possible remedies that the Applicant may implement depending upon the level of visibility impacts occurring at the residence, including financial assistance for the installation of visual screening measures, such as landscaping or fencing. Requests for assistance can be made through a project hotline to be established by the Applicant and published on the Applicant's website.</p> <p>Therefore, through implementation of PDF-AE-1, some of the proposed project components would be screened from view. Regarding the fragmentation of wildlife corridors, M-BI-12 (Wildlife Corridor) requires the project to provide wildlife-friendly fencing to allow for wildlife movement within the project site (see page S-26 of the Draft EIR). No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
113-5	<p>The commenter requests that the project should implement ongoing testing and monitoring of the groundwater wells surrounding the project site.</p> <p>See Global Response GR-3, Groundwater Impacts. The County disagrees with the commenter's assertion that additional mitigation related to hydrology and water quality is required. As provided in Section 2.4, Hydrology and Water Quality, the project would adopt mitigation measure M-HY-1, which implements flood control measures to reduce impacts associated with flood hazards and risk of pollutant release to less than significant. With regard to direct impacts to groundwater resources, and as discussed throughout the Draft EIR, the project would not rely on the use of groundwater wells as a water source. Water for the project would be purchased from the Jacumba Community Services District (JCSD) and imported to the project site by water trucks. The Project Facility Availability Water Agreement between JCSD and the applicant, dated June 28, 2022, has been included as Appendix Q to the Final EIR. As required by PDF-HY-2, the project would implement a Groundwater Mitigation Monitoring and Mitigation Plan for the JCSD wells. This project design feature would ensure that the project would not result in adverse impacts to the underground groundwater aquifers. For ease of reference, PDF-HY-2 states:</p> <p style="padding-left: 40px;"><b>Implementation of GMMP for JCSD.</b> To ensure nonpotable water purchased from the Jacumba Community Services District (JCSD) does not result in impacts to the aquifers accessed by JCSD's nonpotable water production wells (Highland Center Well and Park Well), the Starlight Solar Developer will implement the Groundwater Mitigation Monitoring and Mitigation Plan (GMMP) for the Flat Creek watershed.</p> <p style="padding-left: 40px;">A groundwater monitoring report will be completed by a Professional Geologist or Professional Engineer licensed in the state of California and will be submitted to County Planning and Development Services (PDS) annually no later than 28 days following the end of the calendar year. Groundwater monitoring reports should be submitted for 5 years after proposed project construction has commenced. After 5 years, County PDS should determine if continuous reporting is required based on the effects of groundwater extraction from the previous 5 years. The annual reports will include the following information:</p> <ul style="list-style-type: none"> <li>• Groundwater-level hydrographs and tabulated groundwater-level data for each accessible well in the groundwater-monitoring network</li> <li>• Tabulated groundwater production volumes from JCSD nonpotable wells</li> <li>• Documentation of any changes in well pumping or groundwater well conditions for wells in the groundwater-monitoring network</li> <li>• Documentation of groundwater-dependent habitat monitoring, if necessary, as described in the GMMP</li> </ul> <p style="padding-left: 40px;">If the baseline groundwater levels at the wells included in the groundwater monitoring network are exceeded by 5 feet, County PDS will be notified via letter and email within 1 working day of the exceedance, or immediately after the exceedance is recognized. Additionally, if groundwater-level thresholds at the off-site wells are exceeded by their respective thresholds, pumping of JCSD nonpotable wells for the project will cease and County PDS will be notified via letter and email within 1 working day, or immediately after the exceedance is recognized.</p> <p>As stated above, the project would implement project design feature PDF-HY-2, which specifies that the County will determine if continuous groundwater monitoring and reporting is required based on the effects of groundwater extraction during the 5-year period after project construction has commenced. The County finds PDF-HY-2 sufficient to address groundwater monitoring requirements. As provided in California PRC Section 21002, CEQA does not require the adoption of additional mitigation measures for impacts already mitigated to a level that is less than significant. As such, potential impacts related to groundwater have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>

Comment No.	Response
113-6	<p>The commenter requests that the project should address the potentially increased wildfire risks associated with the battery energy storage system (BESS).</p> <p>See Global Response GR-5, Wildfire Risks. The County appreciates the commenter's concern regarding wildfire risk. As discussed in Chapter 1.0, Project Description, Location, and Environmental Setting, the BESS facilities included in the proposed project would use lithium iron phosphate batteries. Lithium iron phosphate batteries have higher thermal stability and a higher thermal runaway threshold than lithium manganese cobalt batteries. As a result, lithium iron phosphate batteries are inherently safer with a lower risk of thermal runaway as compared to lithium manganese cobalt or traditional lithium-ion batteries (Evro et al. 2024).</p> <p>As detailed in the Construction Fire Protection Plan (FPP), each battery storage cabinet would have a metal frame with insulation, air conditioning, and fire suppression, with separate enclosures for the electronic controls, inverters, and rectifiers. There would be a built-in heat detection and fire protection system and a fire extinguishing system. The heat and fire detection system would be linked to an automatic inert gas suppression system within each cabinet. The containers would also have an interior aerosol fire suppression system. The National Fire Protection Association (NFPA) has developed a new Standard for the Installation of Stationary Energy Storage Systems (NFPA 855). This standard addresses the design, construction, installation, commissioning, operation, maintenance, and decommissioning of stationary energy storage systems. The system would be designed in accordance with applicable NFPA safety standards. The BESS would be sited with a setback from off-site areas as a buffer against potential wildfire ignitions. The cabinets would not be walk-in containers; thus, the battery storage cabinets would be non-habitable structures per the state and local fire codes that are in place at the time a building permit application is submitted to the County.</p> <p>The Draft EIR, which accounts for the project's location in a Very High Fire Hazard Severity Zone, concludes that, with the incorporation of M-WF-1 through M-WF-6, the project would not exacerbate the risk of fire ignition at the project site; therefore, environmental impacts were determined to be less than significant. M-WF-1 (Fire Protection Plan) requires the implementation of numerous risk reduction measures to ensure adequate fire mitigation, internal project site access, and safety during construction, operation, and decommissioning activities. M-WF-2 (Fuel Modification Zones) would require the implementation and maintenance of fuel modification zones (FMZs), which would reduce wildfire risks during project operations. M-WF-3 (Battery Energy Storage System Measures) requires the incorporation of safety measures that would reduce fire risk at the BESS and would reduce the spread potential from a fire starting in the BESS. M-WF-4 (Construction Fire Protection Plan) requires the implementation of a Construction Fire Protection Plan, which would reduce wildfire ignition risk during construction and decommissioning activities. M-WF-5 (Red Flag Warning Measures) outlines precautions during elevated weather conditions to minimize the potential of uncontrolled spread of a wildfire. Lastly, M-WF-6 (Fire Protection and Mitigation Agreement) requires the Applicant to enter into a Fire Protection and Mitigation Agreement with the San Diego County Fire Protection District (SDCFPD) to make a fair share contribution toward local emergency response capabilities (see Appendix P). These measures are consistent with the recommendations of the comprehensive FPP and applicable fire codes (see Appendix L). The FPP provides fire behavior modeling for on-site and off-site fuels, including under worst-case-scenario conditions. The results from the modeling would provide guidance for design and measures to lessen the threat of and hazards from ignitions and wildfires, including specifically during construction activities. Potential environmental impacts associated with wildfire have been adequately assessed in the Draft EIR, and no new significant environmental issues have been identified. State CEQA Guidelines Section 15088(a) does not require a response to comments that do not raise significant environmental issues. Therefore, no revisions to the Draft EIR are necessary.</p>
113-7	<p>The commenter requests that the total footprint of the project should be reduced to minimize potential visual and noise impacts.</p> <p>See Global Response GR-1, Visual Impacts. A reduced project footprint was considered in the Draft EIR. The project, as currently proposed, would include 588 acres of development. However, as discussed in Chapter 4.0, Project Alternatives, of the Draft EIR, the "Reduced Development Alternative" proposes to implement a smaller version of the project. Under the Reduced Development Alternative, the development footprint would be 538 acres, a reduction of 50 acres from the proposed project. This alternative would remove approximately 50 acres of solar arrays and infrastructure in the northern portion of the project (Areas A-1 and A-2). This reduction in the development footprint would remove solar arrays from the northern side of the ridgeline and provide a visual buffer between the proposed solar facility, Old Highway 80, I-8, and some of the off-site private properties. CEQA provides that the lead agency, in the Final EIR, may reject alternatives that do not satisfy project goals, do not offer substantial environmental advantages, or are infeasible given economic, environmental, or technological factors involved (see <i>Bay Area Citizens v. Association of Bay Area Governments</i> (2016) 248 Cal.App.4th 966).</p> <p>With respect to aesthetics, the Draft EIR provides an extensive analysis of potential impacts to aesthetic resources and states that no feasible mitigation measures have been identified to reduce the visual impacts of the Project to a less than significant level (see Section 2.1, Aesthetics). As stated above, CEQA does not require the adoption of infeasible mitigation measures or mitigation measures that would not avoid or lessen significant environmental impacts. Here, the County has determined that no feasible mitigation measure, including increased buffer distance, would reduce visual impacts to a level that is less than significant.</p>

Comment No.	Response
	<p>Regarding noise impacts, as provided in Section 2.5, Noise, and the Noise Analysis Report prepared for the proposed project (Appendix J.1), a noise measurement survey of the existing ambient noise environment consisting of a series of sound level measurements was conducted at nine locations in the project area on June 8, 2022 (see Figure 2.5-1). The measured sound levels in the project area ranged from approximately 30 A-weighted decibels (dBA) continuous sound level (Leq) to 43 dBA Leq (see Table 2.5-2). Based on the modeling results, noise levels at the project boundary would range up to 37 dBA Leq at the property line corner closest to the BESS area. Therefore, noise levels would comply with County Noise Ordinance Section 36.404 and would not exceed the “rural noise standards” of 50 dBA from 7:00 a.m. to 10 p.m. and 45 dBA from 10:00 p.m. to 7:00 a.m. As shown on Figure 1-13 in Chapter 1.0, Project Description, Location, and Environmental Setting, with the exception of the Tule Wind Groundwater Permitting Project, all of the past, present, and reasonably anticipated future projects in the project area would be several miles away from the project site. Due to the attenuation of noise over large distances, the noise generated during operation of the project would not contribute to any cumulative noise impacts. Furthermore, the Draft EIR adopts mitigation measures M-N-1 (Stationary Equipment) and M-N-2 (Construction Noise Management Plan) to reduce impacts associated with construction-related noise to less than significant. Therefore, potential impacts related to noise have been adequately assessed in the Draft EIR. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
<p>I13-8</p>	<p>The commenter states that the project could increase local temperatures by 2 to 8 Fahrenheit and expresses concern regarding the project’s potential heat island effects.</p> <p>Refer to Global Response GR-4, Heat Island Effect. Given that there are no significance thresholds for the photovoltaic heat island effect and given the limited number of studies regarding this effect, there is no evidence that any possible increase in ambient temperature from the proposed project would significantly impact human health or the environment. No changes to the EIR were determined to be necessary in response to this comment.</p>
<p>I13-9</p>	<p>This comment concludes the letter.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment. A copy of this comment letter will be included in the Final EIR, which will be provided to the Board of Supervisors for review when the project is considered for approval</p>

**From:** DAVID BERGGREN <davidberggren@cox.net>  
**To:** "Nicholas.Koutoufidis1@sdcounty.ca.gov"  
<nicholas.koutoufidis1@sdcounty.ca.gov>  
**Subject:** [External] Starlight Solar Project (PDS2022-MUP-22-010) DEIR - Public Comment  
**Date:** Mon, 15 Sep 2025 20:30:35 +0000

Dear Mr. Koutoufidis and the San Diego Planning Commission:

As Boulevard property owners, we oppose the Starlight Solar Project due to unacceptable environmental impacts, procedural deficiencies, and violations of environmental justice principles. The DEIR acknowledges significant unavoidable impacts while failing to protect affected residents or provide community benefits.

I14-1

Direct Property Impacts

Destroying our views and sacrificing the character of Boulevard  
Our property boundary sits 300 feet from proposed solar panels. The DEIR acknowledges unmitigated visual impacts that will destroy the rural character essential to our nature-based vacation rental business. This industrial infrastructure will significantly decrease our property value and threaten our livelihood, as guests seek the peace, remoteness, and unspoiled views that this project eliminates.

I14-2

Lowering our residential well recharge rates and contamination  
Our residential well was excluded from impact analysis, raising serious concerns about groundwater effects from extensive grading and soil compaction. We worry about the recharge rates of our well going down and possible contamination of our well water.

I14-3

Fire Safety and Insurance Risks

This project adds industrial infrastructure to a Very High Fire Hazard Severity Zone with limited evacuation routes. Increased fire risk

I14-4  
I14-5

threatens our ability to maintain property insurance, creating financial hardship in an already challenging rural insurance market.

↑ I14-5  
| (cont'd)

#### Environmental Justice Violations

Boulevard, Jacumba, and Campo have become dumping grounds for utility-scale renewable projects that benefit urban areas while burdening disadvantaged rural communities. This pattern violates the County's Climate Action Plan commitment to equitable distribution of renewable energy costs and benefits. Our community faces frequent power shutoffs yet receives no local energy benefits from these projects.

I14-6

#### Construction Impacts

The DEIR inadequately analyzes construction noise, pile driving, and potential blasting near residential properties. These impacts violate rural living standards and threaten resident health in a community that serves as refuge from urban disruption.

I14-7

#### Procedural Deficiencies

The County routinely approves energy projects through Statements of Overriding Considerations despite significant unavoidable impacts. This piecemeal approach fails CEQA requirements for cumulative impact analysis. A Programmatic EIR is needed to assess combined effects of all East County renewable projects. If multiple projects are under construction at the same time, it will be a disaster for environmentally and for the quality of life for residents.

I14-8

#### Required Actions

We request the County:

Deny the project and select the No Project alternative as

I14-9  
↓

environmentally superior.

▲ I14-9  
┆ (cont'd)

Provide written explanation of how concentrating renewable projects in disadvantaged East County communities complies with CEQA environmental justice requirements and County Climate Action Plan equity commitments.

┆ I14-10

Require Programmatic EIR to assess cumulative impacts of all utility-scale renewable projects in Boulevard, Campo, and Jacumba.

┆ I14-11

If approved, mandate binding conditions:

\* inclusion of private wells within 0.5 miles in groundwater monitoring;

┆ I14-12

\*

baseline and ongoing well monitoring;

\*

300-foot setbacks from property lines and roads;

┆ I14-13

\*

native landscaping around solar installations;

┆ I14-14

\* developer-funded residential solar systems or microgrid expansion for directly impacted residents.

┆ I14-15

Boulevard and surrounding communities are not appropriate energy sacrifice zones. If this project cannot be denied, affected residents deserve genuine protection, respect, and compensation beyond symbolic gestures. We urge the County to pursue renewable energy development in locations that don't burden disadvantaged communities or compromise critical environmental resources.

┆ I14-16

Respectfully,

David Berggren  
Property Owner – Boulevard, CA  
(619)993-1507

Two Property Addresses in Boulevard: Residence at 1594 Jewel Valley Rd, Boulevard, CA 91905, and 40 acres at 32.638832, -116.263905

### 8.2.5.14 **Response to Comment Letter I14 from David Berggren (received September 15, 2025)**

Comment No.	Response
I14-1	<p>The commenter introduces the letter and expresses their opposition to the proposed project. The commenter believes that the proposed project would result in significant impacts to the local community which would outweigh the potential benefits.</p> <p>Responses to the specific comments in the letter are provided below. This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment. A copy of this comment letter will be included in the Final EIR, which will be provided to the Board of Supervisors for review when the project is considered for approval</p>
I14-2	<p>The commenter states that the project would result in significant impacts to visual resources which could decrease property values and would be detrimental to the character of the local community.</p> <p>See Global Response GR-1, Visual Impacts. The County appreciates the commenter's concern regarding visual impacts. As discussed in the Draft EIR, the project would result in significant and unavoidable impacts to visual resources. Specifically, as detailed in Section 2.1, Aesthetics, the project would result in significant impacts related to Visual Character and Quality (Impact AE-1), Valued Visual Character and Image of Community (Impact AE-2), and Focal and Panoramic Views (Impact AE-2). No feasible mitigation measures have been identified to reduce the visual impacts of the project to a less than significant level. CEQA does not require the adoption of infeasible mitigation measures or mitigation measures that would not avoid or lessen significant environmental impacts. Here, the County has determined that no feasible mitigation measure, including increased buffer distance, would reduce visual impacts to a level that is less than significant. As such, if the proposed project is approved, the County will prepare a Statement of Overriding Considerations, as required by CEQA Guidelines Section 15093. The comments received on the Draft EIR will be included in the project's administrative record and presented to the Board of Supervisors (Board) for review. No changes to the Draft EIR were determined to be necessary in response to this comment.</p> <p>Additionally, see Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice. Comments related to social and economic issues, such as decreases in property value, do not specifically relate to the environmental analysis included in the Draft EIR. This response is provided for informational purposes and will be considered by the Board during the project approval process and will be made available through publication of this Final EIR. These comments do not warrant revisions to the Draft EIR. As discussed in the Draft EIR, the project would result in significant and unavoidable impacts to visual resources. Specifically, as detailed in Section 2.1, Aesthetics, the project would result in significant impacts related to Visual Character and Quality (Impact AE-1), Valued Visual Character and Image of Neighborhood or Community (Impact AE-2), and Focal and Panoramic Vistas (Impact AE-3). No feasible mitigation measures have been identified to reduce the visual impacts of the project to a less than significant level. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I14-3	<p>The commenter states that their residential groundwater well should have been included in the Draft EIR's groundwater impact analysis.</p> <p>See Global Response GR-3, Groundwater Impacts. The project does not propose the use of any on-site wells and would therefore not result in the drawdown of the local groundwater aquifer or affect nearby private wells. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I14-4	<p>The commenter expresses concern regarding increased wildfire ignition risk associated with the project being constructed in a very high fire hazard severity zone.</p> <p>The County appreciates the commenter's concern regarding wildfire risk. The Draft EIR, which accounts for the project's location in a Very High Fire Hazard Severity Zone, concludes that, with the incorporation of M-WF-1 through M-WF-6, the project would not exacerbate the risk of fire ignition at the project site; therefore, environmental impacts were determined to be less than significant. M-WF-1 (Fire Protection Plan) requires the implementation of numerous risk reduction measures to ensure adequate fire mitigation, internal project site access, and safety during construction, operation, and decommissioning activities. M-WF-2 (Fuel Modification Zones) would require the implementation and maintenance of FMZs, which would reduce wildfire risks during project operations. M-WF-3 (Battery Energy Storage System Measures) requires the incorporation of safety measures that would reduce fire risk at the battery energy storage system (BESS) and would reduce the spread potential from a fire starting in the BESS. M-WF-4 (Construction Fire Protection Plan) requires the implementation of a Construction Fire Protection Plan (FPP), which would reduce wildfire ignition risk during construction and decommissioning activities. M-WF-5 (Red Flag Warning Measures) outlines precautions during elevated weather conditions to minimize the potential of uncontrolled spread of a wildfire. Lastly, M-WF-6 (Fire Protection and Mitigation Agreement) requires the Applicant to enter into a Fire Protection and Mitigation Agreement with the San Diego County Fire Protection District (SDCFPD) to make a fair share contribution toward local emergency response capabilities (see Appendix P). These measures are consistent with the recommendations of the comprehensive FPP and applicable fire codes (see Appendix L). The FPP provides fire behavior modeling for on-site and off-site fuels, including under worst-case-scenario conditions.</p>

Comment No.	Response
	<p>The results from the modeling would provide guidance for design and measures to lessen the threat of and hazards from ignitions and wildfires, including specifically during construction activities. Potential environmental impacts associated with wildfire have been adequately assessed in the Draft EIR, and no new significant environmental issues have been identified. State CEQA Guidelines Section 15088(a) does not require a response to comments that do not raise significant environmental issues. Therefore, no revisions to the Draft EIR are necessary.</p>
114-5	<p>The commenter states that the project would increase fire insurance rates for residents in the surrounding area.</p> <p>See Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice. Regarding fire insurance, CEQA states that economic effects such as insurance rates are not, by themselves, environmental impacts (State CEQA Guidelines Sections 15131 and 15382). While economic changes can sometimes be a factor in determining whether a physical change is significant, an increase in fire insurance costs does not trigger a physical environmental impact that must be reviewed. Absent substantial evidence of a reasonably foreseeable physical environmental change caused by the project (e.g., increased wildfire ignition or spread), potential changes to insurance pricing are not analyzed as significant effects. In this instance, the Draft EIR evaluates wildfire ignition/spread risk and has proposed mitigation (M-WF-1 through M-WF-6) that reduce ignition risk to less than significant, thereby addressing the underlying physical hazard.</p> <p>As of March 13, 2025, the California Public Utilities Commission (CPUC) now oversees maintenance/operations and verifies emergency response plans for battery facilities. Additionally, on October 6, 2025, Governor Gavin Newsom signed Senate Bill 283 which requires battery storage developers to engage with local fire authorities prior to submitting an application. This consultation must address facility design, assess potential risks and integrate emergency response plans. A facility will also be required to undergo a safety inspection by local fire officials before the facility can go online. These actions are separate and independent of CEQA, but relevant to the project's risk context. Nothing in this response affects or limits the authority of the California Department of Insurance to regulate insurance rates. Insurance availability and pricing are determined under separate state laws and regulatory frameworks.</p> <p>This response is provided for informational purposes and will be considered by the Board during the project approval process and will be made available through publication of this Final EIR; this comment does not warrant revisions to the Draft EIR.</p>
114-6	<p>The commenter states that the location of the proposed project poses an environmental justice issue and would conflict with County's Climate Action Plan goal to achieve an equitable distribution of renewable energy costs and benefits.</p> <p>See Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice. CEQA does not specifically reference "environmental justice," nor does it require analysis of environmental justice concerns (see <i>Golden Door Properties, LLC v. County of San Diego</i> (2020) 50 Cal.App.5th 467, 555 n.46). Instead, CEQA focuses on evaluating potentially significant environmental impacts, including those that are cumulatively considerable. Traditionally, environmental justice issues pertain to the effects of pollution on low-income communities (California Department of Justice 2012). Additionally, under the County of San Diego's General Plan, the community of Boulevard was not designated as an Environmental Justice community in the County. As described in GR-6, comments related to social and economic issues do not specifically relate to the environmental analysis included in the Draft EIR. This response is provided for informational purposes and will be considered by the Board during the project approval process and will be made available through publication of this Final EIR.</p> <p>The equitable distribution goal identified by the commenter in the County's Climate Action Plan is not intended to be implemented by projects initiated by private developers. Rather, it guides the County's development and implementation of the Climate Action Plan. Further, as described Section 3.1.4, Greenhouse Gas Emissions, in the Draft EIR, the proposed project demonstrated consistency with the County's Climate Action Plan (see Appendix H.3). No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
114-7	<p>The commenter states that the Draft EIR fails to adequately analyze noise impacts associated with pile driving and blasting activities required for project construction.</p> <p>The County appreciates the commenter's concern regarding noise impacts. As provided in Section 2.5, Noise, and the Noise Analysis Report prepared for the proposed project (Appendix J.1), blasting would occur no more than once per day. Ground vibrations, noise level, and air over-pressure would be monitored during each blast for compliance with the limits established by 30 Code of Federal Regulations (CFR) 816.67(b)(1)(i) and 816.67(d)(2)(i). Following each blast, seismographs shall be checked to ensure that the blasting has not exceeded applicable noise and vibration criteria at the residential structures within 600 feet of the blast activity. The blasting contractor will ensure compliance with 30 CFR 816.67(b)(1)(i) and 816.67(d)(2)(i). Therefore, construction of the project would result in less than significant impacts due to blasting. Furthermore, the Draft EIR includes project design features PDF-N-1 and PDF-N-2 which would require blasting control measures and the preparation of a blasting control plan. Regarding noise concerns related to pile driving, mitigation measure M-N-2 (Construction Noise Management Plan) specifies requirements and limitations for pile driver usage that will reduce associated noise impacts to less than significant (see page S-35 of the Draft EIR).</p>

Comment No.	Response
	Therefore, potential impacts related to noise have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.
I14-8	<p>The commenter notes that several proposed renewable energy projects have been approved despite the significant and unavoidable impacts of the projects. The commenter requests that the County should prepare a Programmatic EIR to assess the cumulative impacts of renewable energy projects in the region.</p> <p>As discussed in Global Response GR-2, Cumulative Impacts, regarding the request for the County to prepare a Program EIR related to utility-scale renewable development in the Mountain Empire subregion of Eastern San Diego County, such level of analysis is not required by CEQA. CEQA only requires environmental review when there is a specific project or policy being proposed for approval. In this case, the County is not creating a new program or plan for renewable energy—individual projects will continue to be reviewed separately under existing policies and zoning. The County previously looked into doing broader renewable energy planning through its Renewable Energy Work Plan (2013–2014) and determined that a program-level study was not necessary. Since that time, renewable projects have been reviewed individually with the level of CEQA analysis appropriate for each proposal. A new programmatic review would not add value or meet a specific CEQA need at this stage. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I14-9	<p>The commenter requests that the Board of Supervisors deny the proposed project.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment. A copy of this comment letter will be included in the Final EIR, which will be provided to the Board of Supervisors for review when the project is considered for approval.</p>
I14-10	<p>The commenter requests that the County provide an explanation as to how the location of the proposed project in addition to related utility-scale renewable energy projects in eastern San Diego County complies with the environmental justice requirements of CEQA, the County’s Climate Action Plan, and equity guidelines provided by the State of California.</p> <p>See Response I14-6 above and Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I14-11	<p>The commenter requests that the County prepare a Programmatic EIR to assess the cumulative impacts of related utility-scale renewable energy projects in the region.</p> <p>See Response I14-9 above and Global Response GR-2, Cumulative Impacts. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I14-12	<p>The commenter requests that the project should implement groundwater testing for all residential wells within half a mile of the project site.</p> <p>See Global Response GR-3, Groundwater Impacts. The County disagrees with the commenter’s assertion that additional mitigation related to hydrology and water quality is required. As provided in Section 2.4, Hydrology and Water Quality, the project would adopt mitigation measure M-HY-1, which implements flood control measures to reduce impacts associated with flood hazards and risk of pollutant release to less than significant. With regard to direct impacts to groundwater resources, and as discussed throughout the Draft EIR, the project would not rely on the use of groundwater wells as a water source. Water for the project would be purchased from the Jacumba Community Services District (JCSD) and imported to the project site by water trucks. The Project Facility Availability Water Agreement between JCSD and the applicant, dated June 28, 2022, has been included as Appendix Q to the Final EIR. As required by PDF-HY-2, the project would implement a Groundwater Mitigation Monitoring and Mitigation Plan for the JCSD wells. This project design feature would ensure that the project would not result in adverse impacts to the underground groundwater aquifers. For ease of reference, PDF-HY-2 states:</p> <p><b>Implementation of GMMP for JCSD.</b> To ensure nonpotable water purchased from the Jacumba Community Services District (JCSD) does not result in impacts to the aquifers accessed by JCSD’s nonpotable water production wells (Highland Center Well and Park Well), the Starlight Solar Developer will implement the Groundwater Mitigation Monitoring and Mitigation Plan (GMMP) for the Flat Creek watershed.</p> <p>A groundwater monitoring report will be completed by a Professional Geologist or Professional Engineer licensed in the state of California and will be submitted to County Planning and Development Services (PDS) annually no later than 28 days following the end of the calendar year. Groundwater monitoring reports should be submitted for 5 years after proposed project construction has commenced. After 5 years, County PDS should determine if continuous reporting is required based on the effects of groundwater extraction from the previous 5 years. The annual reports will include the following information:</p> <ul style="list-style-type: none"> <li>• Groundwater-level hydrographs and tabulated groundwater-level data for each accessible well in the groundwater-monitoring network</li> </ul>

Comment No.	Response
	<ul style="list-style-type: none"> <li>• Tabulated groundwater production volumes from JCSD nonpotable wells</li> <li>• Documentation of any changes in well pumping or groundwater well conditions for wells in the groundwater-monitoring network</li> <li>• Documentation of groundwater-dependent habitat monitoring, if necessary, as described in the GMMP</li> </ul> <p>If the baseline groundwater levels at the wells included in the groundwater monitoring network are exceeded by 5 feet, County PDS will be notified via letter and email within 1 working day of the exceedance, or immediately after the exceedance is recognized. Additionally, if groundwater-level thresholds at the off-site wells are exceeded by their respective thresholds, pumping of JCSD non-potable wells for the project will cease and County PDS will be notified via letter and email within 1 working day, or immediately after the exceedance is recognized.</p> <p>As stated above, the project would implement project design feature PDF-HY-2, which specifies that the County will determine if continuous groundwater monitoring and reporting is required based on the effects of groundwater extraction during the 5-year period after project construction has commenced. The County finds PDF-HY-2 sufficient to address groundwater monitoring requirements. As provided in California PRC Section 21002, CEQA does not require the adoption of additional mitigation measures for impacts already mitigated to a level that is less than significant. As such, potential impacts related to groundwater have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
114-13	<p>The commenter requests that the project should implement a 300-foot buffer from all property lines and roads. See Global Response GR-1, Visual Impacts. The project, as currently proposed, does not include a uniform 300-foot buffer between the proposed photovoltaic (PV) panels and adjacent properties and roads. Rather, the project includes a minimum buffer of 30 feet, between the proposed project components and the boundaries of the project site. Further, as shown in Figure 1-3 in Chapter 1.0 of the Draft EIR, the project boundaries do not fully encompass the entire footprint of the parcels in which the project is proposed, which greatly increases the buffer distances in some areas of the project site. For example, Area B would be located over 2,000 feet east of the adjacent parcel to the west, and Area E would be located over 200 feet west of the adjacent parcel to the east. Additionally, as shown in Figure 1-6 in Chapter 1.0 of the Draft EIR, the project contains 15 cultural open space easement areas of various sizes within the project site, totaling 24.44 acres. No development or disturbance would occur within the open space easement areas. The open space easements along the edges of the site would increase the distance of the project components from the nearest adjacent parcels by between 120 feet and 500 feet in some areas, including the northwestern and southwestern edges of Area A-2, as well as the southwestern corner of Area A-1. Further, it should be noted that most existing residences in the surrounding vicinity are substantially set back from their own property lines, which increases the distance between existing residences and the proposed project components. With the exception of the residence located 150 feet west of the project site (northwest of Area A-2), all other residences would be over 400 feet away from the proposed PV panels.</p>
114-14	<p>The commenter requests that the project should include native landscaping to visually screen the proposed solar panels. See Global Response GR-1, Visual Impacts. The project, as currently proposed, would not include landscaping screening. As discussed in Section 2.1, Aesthetics, of the Draft EIR, installing landscaping around the entire project site for screening purposes would be infeasible, due to the high winds and arid conditions of the area. It would be highly unlikely that new vegetation would survive at a large enough scale (i.e., grow to maturity) to screen the entire project from nearby views. Pursuant to State CEQA Guidelines Section 21002.1(b), CEQA does not require the adoption of infeasible mitigation measures. Therefore, the County disagrees with the commenters' assertion that landscape screening must be installed around the entire project site. However, as discussed in PDF-AE-1, the Applicant will coordinate with the resident of any existing private residence located within a distance of 500 feet of a project solar panel installation to assess possible remedies, including financial assistance, for the installation of visual screening measures, including landscape screening. For ease of reference, PDF-AE-1 states:</p> <p style="padding-left: 40px;">The Applicant will coordinate with the resident of any existing (existing as of the date of this Major Use Permit Decision) private residence located within a distance of 500 feet of a project solar panel installation to assess visibility impact complaints made within 1 year from the initial operations date of the project. This assessment would include possible remedies that the Applicant may implement depending upon the level of visibility impacts occurring at the residence, including financial assistance for the installation of visual screening measures, such as landscaping or fencing. Requests for assistance can be made through a project hotline to be established by the Applicant and published on the Applicant's website.</p> <p>Therefore, through implementation of PDF-AE-1, some of the proposed project components would be screened from view. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>

Comment No.	Response
I14-15	<p>The commenter requests that the County should require the project applicant to provide funding to install residential solar panels and battery systems, or microgrid expansion for nearby residents.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment. A copy of this comment letter will be included in the Final EIR, which will be provided to the County Board of Supervisors for review when the project is considered for approval. See Global Response GR-7, Non-Substantive Comments. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I14-16	<p>This comment concludes the letter and requests that the Board of Supervisors deny the proposed project.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment. A copy of this comment letter will be included in the Final EIR, which will be provided to the Board of Supervisors for review when the project is considered for approval.</p>

**From:** Rebecca Berggren <itsmebeccalee@gmail.com>  
**To:** Nicholas.Koutoufidis1@sdcounty.ca.gov  
**Subject:** [External] Public Comment in OPPOSITION to Starlight Solar Project  
**Date:** Mon, 15 Sep 2025 09:13:52 -0700

Dear Nicholas Koutoufidis and San Diego County Planning & Development Services -

I am the owner of two separate properties in Boulevard, California, and am writing to submit this formal comment in opposition of the Starlight Solar Project (PDS2022-MUP-22-010) Draft Environmental Impact Report (DEIR).

I am strongly opposed to this project for the following reasons.

The project presents clear and documented Significant and Unavoidable Impacts, violates adopted County policies, threatens our water and safety, and offers no direct benefits to the very community being harmed. These impacts are in direct conflict with CEQA requirements, and we urge the County to deny this project or significantly revise it to include enforceable community protections and benefits.

I15-1

1. Visual and Scenic Resource Impacts

\*  
The DEIR acknowledges significant and unavoidable visual impacts.

\*  
Our north property line is just 300 feet from proposed solar panels in Area C. We and our guests regularly hike and explore that portion of the land.

\*  
The visual intrusion directly conflicts with the Boulevard Community Plan, Scenic Resource Policies, and our rights to rural preservation and quality of life.

I15-2

2.  
Environmental Justice & Equity Concerns

\*

San Diego County's Climate Action Plan (CAP) and the Regional Decarbonization Framework (RDF) affirm that renewable energy development must be conducted equitably with a commitment to not concentrating impacts in already burdened or disadvantaged communities, and to distribute both costs and benefits fairly across the county.

\*

The clustering of utility-scale renewable projects in East County's rural and disadvantaged areas - Jacumba, Boulevard, Campo - creates a pattern of environmental injustice. Our community has been repeatedly selected to host projects that urban centers benefit from, while we lose groundwater, viewsheds, rural character, and fire safety and see none of the promised returns.

\*

The Starlight Solar project is being sited in the rural backcountry of San Diego County, specifically in Boulevard, a community that has long been designated as disadvantaged in various California state tools, including the California Water Board's DAC mapping tool.

\*

These disadvantaged communities are small and don't have the resources to fight the developers.

\*

These areas are already overburdened by cumulative environmental and infrastructure impacts, including wind farms, solar installations, substations, and transmission lines.

I15-3

3.  
Well Recharge and Groundwater Risks

\*

Despite the project bordering one of our properties on the north AND west side, our residential well was not considered for impact analysis.

\*

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

I15-4

I15-5

4.  
Property Devaluation and Business Harm

\*

Our land and home are not speculative investments—they are our livelihoods.

\*

We have built a nature-focused vacation rental, and this project threatens the core business model of peace, remoteness, and unspoiled views.

\*

Solar infrastructure so close will make the property less desirable, lowering its resale and income-generating value.



I15-6

5.  
Wildfire Ignition Risk

\*

The project site is within a Very High Fire Hazard Severity Zone, and the addition of large-scale infrastructure increases ignition potential.

\*

Nearby residents like us will be at greater risk with limited evacuation routes and dry, windy conditions.

\*

Increased fire risk from this project may impact our ability to obtain or retain fire insurance for our property, which is already a growing challenge in rural San Diego County. This poses a serious financial and safety concern for us as property owners living in a high wildfire risk zone.



I15-7



I15-8

6.  
Energy Access and Resilience

\*

San Diego County has not ensured that rural communities benefit from the energy being extracted from their land.



I15-9

\*  
Boulevard residents face frequent 2–3 day PSPS outages, yet none of this 100 MW project will serve local homes.

I15-9  
(cont'd)

7.  
Construction Noise, Blasting, and Vibration

\*  
The DEIR fails to properly assess cumulative or peak-period construction noise.

I15-10

\*  
The use of pile driving and blasting so close to private homes is unacceptable.

I15-11

\*  
These impacts jeopardize resident health and violate rural noise thresholds.

I15-12

8.  
Pattern of Unchecked Project Approvals

\*  
Every energy project in Boulevard, Jacumba, and Campo has received an SOC (Statement of Overriding Considerations), including: Tule Wind, Rugged Solar, Tierra del Sol, JVR, Campo Wind, and more.

I15-13

\*  
These SOCs are issued despite documented Significant and Unavoidable Impacts.

\*  
The County must stop sacrificing the backcountry to meet vague regional mandates while offering us nothing in return.

9.  
Legal and Procedural Deficiencies

\*  
We support the Jacumba Community Sponsor Group's call for a Programmatic EIR to properly assess cumulative impacts.

I15-14

\*

There is clear legal precedent that the County is required to evaluate regional, interrelated energy development through a comprehensive CEQA analysis.

I15-14  
(cont'd)

REQUESTED ACTIONS:

We respectfully request that the County:

I15-15

1.

Reject the project entirely, or select the "No Project" alternative as the environmentally superior option.

2.

We demand a clear, written explanation of how the siting of this project along with the other utility-scale renewable projects in East County's rural and disadvantaged areas complies with the environmental justice requirements of CEQA, the County's Climate Action Plan, and State equity guidance.

I15-16

3.

A Programmatic EIR to properly assess cumulative impacts of all the utility-scale renewable projects in Boulevard, Campo and Jacumba.

I15-17

4.

If approval proceeds, we demand that the following be made binding conditions of approval:

I15-18

\*

Inclusion of private residential wells within at least 0.5 miles of the project in the GMMP.

\*

Baseline and ongoing monitoring of our wells for water level, recharge, and quality.

▲ I15-18  
┆ (cont'd)

\*  
300-foot setbacks from property lines and ALL public roads to protect privacy, safety, and community character.

┆  
I15-19

\*  
Add native landscaping around all solar panel clusters to mitigate some of the visual blight.

\*  
Require the developer to provide resilience benefits - including funding for residential solar + battery systems OR microgrid expansion - to directly impacted nearby residents as a condition of approval, ensuring at least some equitable benefit is realized locally.

┆  
I15-20

We urge Planning & Development Services and the Board of Supervisors to stop treating Boulevard and surrounding communities as an energy sacrifice zone. This project is incompatible with our community's goals, policies, and values. If it cannot be denied, then the people forced to live next to it must be respected, protected, and compensated with more than symbolic gestures.

Sincerely,

Rebecca Berggren  
Property Owner – Boulevard, CA  
(619)838-4860  
itsmebeccalee@gmail.com <mailto:itsmebeccalee@gmail.com>

Two Property Addresses in Boulevard: Residence at 1594 Jewel Valley Rd, Boulevard, CA 91905, and 40 acres at 32.638832, -116.263905

┆  
I15-21

### 8.2.5.15 Response to Comment Letter I15 from Rebecca Berggren (received September 15, 2025)

Comment No.	Response
I15-1	<p>The commenter introduces the letter and expresses their opposition to the proposed project. The commenter asserts that the proposed project would result in significant impacts to the local community which would outweigh the potential benefits.</p> <p>A copy of this comment letter will be included in the Final EIR, which will be provided to the Board of Supervisors for review when the project is considered for approval. Responses to the specific comments in the letter are provided below.</p>
I15-2	<p>The commenter states that the project would result in significant and unavoidable impacts to visual resources.</p> <p>See Global Response GR-1, Visual Impacts. The County appreciates the commenter's concern regarding visual impacts. As discussed in the Draft EIR, the project would result in significant and unavoidable impacts to visual resources. Specifically, as detailed in Section 2.1, Aesthetics, the project would result in significant impacts related to Visual Character and Quality (Impact AE-1), Valued Visual Character and Image of Neighborhood or Community (Impact AE-2), and Focal and Panoramic Vistas (Impact AE-3). No feasible mitigation measures have been identified to reduce the visual impacts of the project to a less than significant level. CEQA does not require the adoption of infeasible mitigation measures or mitigation measures that would not avoid or lessen significant environmental impacts. Here, the County has determined that no feasible mitigation measure, including increased buffer distance, would reduce visual impacts to a level that is less than significant. As such, if the proposed project is approved, the County will prepare a Statement of Overriding Considerations, as required by CEQA Guidelines Section 15093. The comments received on the Draft EIR will be included in the project's administrative record and presented to the Board of Supervisors (Board) for review. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I15-3	<p>The commenter expresses concerns regarding the environmental justice impacts of the project due to its location in a disadvantaged community and would conflict with the County's Climate Action Plan goal to achieve an equitable distribution of renewable energy costs and benefits.</p> <p>See Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice. CEQA does not specifically reference "environmental justice," nor does it require analysis of environmental justice concerns (see <i>Golden Door Properties, LLC v. County of San Diego</i> (2020) 50 Cal.App.5th 467, 555 n.46). Instead, CEQA focuses on evaluating potentially significant environmental impacts, including those that are cumulatively considerable. Traditionally, environmental justice issues pertain to the effects of pollution on low-income communities (California Department of Justice 2012). Additionally, under the County of San Diego's General Plan, the community of Boulevard was not designated as an Environmental Justice community in the County. Additionally, Boulevard is not designated as a Disadvantaged Community according to Senate Bill 535 CalEnviroScreen data (California Office of Environmental Health Hazard Assessment [OEHHA] 2025). As described in GR-6, comments related to social and economic issues do not specifically relate to the environmental analysis included in the Draft EIR. This response is provided for informational purposes and will be considered by the Board during the project approval process and will be made available through publication of this Final EIR.</p> <p>The equitable distribution goal identified by the commenter in the County's Climate Action Plan is not intended to be implemented by projects initiated by private developers. Rather, it guides the County's development and implementation of the Climate Action Plan. Further, as described Section 3.1.4, Greenhouse Gas Emissions, in the Draft EIR, the proposed project has demonstrated consistency with the County's Climate Action Plan (see Appendix H.3). No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I15-4	<p>The commenter states that their residential groundwater well should have been included in the Draft EIR's groundwater impact analysis.</p> <p>See Global Response GR-3, Groundwater Impacts. The project does not propose the use of any on-site wells and would therefore not result in drawdown of the local groundwater aquifer or affect nearby private wells. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I15-5	<p>The commenter states that the project would result in reduced groundwater recharge of the local aquifer.</p> <p>See Global Response GR-3, Groundwater Impacts. The project does not propose the use of any on-site wells and would therefore not result in drawdown of the local groundwater aquifer. Further, the project would not result in a significant increase in impervious surfaces or significantly alter the existing drainage pattern of the project site. As such, the project would not result in impacts related to groundwater recharge. The project would import nonpotable water for construction and fire suppression purposed from the Jacumba Community Services District (JCSD), and it would implement a Groundwater Monitoring and Mitigation Plan (GMMP) for the JCSD groundwater wells which would ensure that the project would not result in significant impacts to the</p>

Comment No.	Response
	<p>local groundwater aquifer. No changes to the EIR were determined to be necessary in response to this comment.</p>
I15-6	<p>The commenter states that the project would decrease property values and would impact the character of the local community.</p> <p>See Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice. Comments related to social and economic issues, such as property values, do not specifically relate to the environmental analysis included in the Draft EIR. This response is provided for informational purposes and will be considered by the Board during the project approval process and will be made available through publication of this Final EIR. These comments do not warrant revisions to the Draft EIR. As discussed in the Draft EIR, the project would result in significant and unavoidable impacts to visual resources. Specifically, as detailed in Section 2.1, Aesthetics, the project would result in significant impacts related to Visual Character and Quality (Impact AE-1), Valued Visual Character and Image of Neighborhood or Community (Impact AE-2), and Focal and Panoramic Vistas (Impact AE-3). No feasible mitigation measures have been identified to reduce the visual impacts of the project to a less than significant level. As such, if the proposed project is approved, the County will prepare a Statement of Overriding Considerations, as required by CEQA Guidelines Section 15093. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I15-7	<p>The commenter expresses concern regarding increased wildfire ignition risk associated with the project being constructed in a very high fire hazard severity zone.</p> <p>The County appreciates the commenter's concern regarding wildfire risk. The Draft EIR, which accounts for the project's location in a Very High Fire Hazard Severity Zone, concludes that, with the incorporation of M-WF-1 through M-WF-6, the project would not exacerbate the risk of fire ignition at the project site; therefore, environmental impacts were determined to be less than significant. M-WF-1 (Fire Protection Plan) requires the implementation of numerous risk reduction measures to ensure adequate fire mitigation, internal project site access, and safety during construction, operation, and decommissioning activities. M-WF-2 (Fuel Modification Zones) would require the implementation and maintenance of fuel modification zones (FMZs), which would reduce wildfire risks during project operations. M-WF-3 (Battery Energy Storage System Measures) requires the incorporation of safety measures that would reduce fire risk at the battery energy storage system (BESS) and would reduce the spread potential from a fire starting in the BESS. M-WF-4 (Construction Fire Protection Plan) requires the implementation of a Construction Fire Protection Plan (FPP), which would reduce wildfire ignition risk during construction and decommissioning activities. M-WF-5 (Red Flag Warning Measures) outlines precautions during elevated weather conditions to minimize the potential of uncontrolled spread of a wildfire. Lastly, M-WF-6 (Fire Protection and Mitigation Agreement) requires the Applicant to enter into a Fire Protection and Mitigation Agreement with the San Diego County Fire Protection District (SDCFPD) to make a fair share contribution toward local emergency response capabilities (see Appendix P). These measures are consistent with the recommendations of the comprehensive FPP and applicable fire codes (see Appendix L). The FPP provides fire behavior modeling for on-site and off-site fuels, including under worst-case-scenario conditions. The results from the modeling would provide guidance for design and measures to lessen the threat of and hazards from ignitions and wildfires, including specifically during construction activities. Potential environmental impacts associated with wildfire have been adequately assessed in the Draft EIR, and no new significant environmental issues have been identified. State CEQA Guidelines Section 15088(a) does not require a response to comments that do not raise significant environmental issues. Therefore, no revisions to the Draft EIR are necessary.</p>
I15-8	<p>The commenter states that the project would increase fire insurance rates for residents in the surrounding area.</p> <p>See Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice. Regarding fire insurance, CEQA states that economic effects such as insurance rates are not, by themselves, environmental impacts (State CEQA Guidelines Sections 15131 and 15382). While economic changes can sometimes be a factor in determining whether a physical change is significant, an increase in fire insurance costs does not trigger a physical environmental impact that must be reviewed. Absent substantial evidence of a reasonably foreseeable physical environmental change caused by the project (e.g., increased wildfire ignition or spread), potential changes to insurance pricing are not analyzed as significant effects. In this instance, the Draft EIR evaluates wildfire ignition/spread risk and has proposed mitigation (M-WF-1 through M-WF-6) that reduce ignition risk to less than significant, thereby addressing the underlying physical hazard.</p> <p>As of March 13, 2025, the California Public Utilities Commission (CPUC) now oversees maintenance/operations and verifies emergency response plans for battery facilities. Additionally, on October 6, 2025, Governor Gavin Newsom signed Senate Bill 283 which requires battery storage developers to engage with local fire authorities prior to submitting an application. This consultation must address facility design, assess potential risks and integrate emergency response plans. A facility will also be required to undergo a safety inspection by local fire officials before the facility can go online. These actions are separate and independent of CEQA, but relevant to the project's risk context. Nothing in this response affects or limits the authority of the California Department of Insurance to regulate insurance rates. Insurance availability and pricing are determined under separate state laws and regulatory frameworks.</p>

Comment No.	Response
	<p>This response is provided for informational purposes and will be considered by the Board during the project approval process and will be made available through publication of this Final EIR; this comment does not warrant revisions to the Draft EIR.</p>
I15-9	<p>The commenter states that the energy generated by the project would not serve the local community. This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment.</p>
I15-10	<p>The commenter states that the Draft EIR failed to assess the cumulative and peak construction noise impacts of the project.</p> <p>The County appreciates the commenter’s concern regarding noise impacts. Section 2.5, Noise, of the Draft EIR addresses both peak and cumulative noise impacts. As provided in Section 2.5 and the Noise Analysis Report prepared for the proposed project (Appendix J.1), a noise measurement survey of the existing ambient noise environment consisting of a series of sound level measurements was conducted at nine locations in the project area on June 8, 2022 (see Figure 2.5-1). The measured sound levels in the project area ranged from approximately 30 A-weighted decibels (dBA) continuous sound level (Leq) to 43 dBA Leq (see Table 2.5-2). Based on the modeling results, noise levels at the project boundary would range up to 37 dBA Leq at the property line corner closest to the BESS area. Therefore, noise levels would comply with County Noise Ordinance Section 36.404 and would not exceed the “rural noise standards” of 50 dBA from 7:00 a.m. to 10 p.m. and 45 dBA from 10:00 p.m. to 7:00 a.m. As shown on Figure 1-13 in Chapter 1.0, Project Description, Location, and Environmental Setting, with the exception of the Tule Wind Groundwater Permitting Project, all of the past, present, and reasonably anticipated future projects in the project area would be several miles away from the project site. Due to the attenuation of noise over large distances, it would not be expected that the noise generated during operation of the project would contribute to any cumulative noise impacts. Furthermore, the Draft EIR adopts mitigation measures M-N-1 and M-N-2 to reduce impacts associated with operational and construction-related noise to less than significant. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I15-11	<p>The commenter states that pile driving and blasting activities required for project construction should not occur near the surrounding residences.</p> <p>As provided in Section 2.5, Noise, and the Noise Analysis Report prepared for the proposed project (Appendix J.1), blasting would occur no more than once per day. Ground vibrations, noise level, and air over-pressure would be monitored during each blast for compliance with the limits established by 30 Code of Federal Regulations (CFR) 816.67(b)(1)(i) and 816.67(d)(2)(i). Following each blast, seismographs shall be checked to ensure that the blasting has not exceeded applicable noise and vibration criteria at the residential structures within 600 feet of the blast activity. The blasting contractor will ensure compliance with 30 CFR 816.67(b)(1)(i) and 816.67(d)(2)(i). Therefore, construction of the project would result in less than significant impacts due to blasting. Furthermore, the Draft EIR includes project design features PDF-N-1 and PDF-N-2 which would require blasting control measures and the preparation of a blasting control plan. Regarding noise concerns related to pile driving, mitigation measure M-N-2 (Construction Noise Management Plan) specifies requirements and limitations for pile driver usage that will reduce associated noise impacts to less than significant (see page S-35 of the Draft EIR). Therefore, potential impacts related to noise have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
I15-12	<p>The commenter states that the noise generated by the project would impact the health of nearby residents and would exceed the rural land use noise thresholds.</p> <p>See responses I10-10 and I10-11 above. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I15-13	<p>The commenter notes that several proposed renewable energy projects in Boulevard, Jacumba, and Campo have been approved despite the significant and unavoidable impacts of the projects. The commenter requests that the County should focus renewable energy development elsewhere.</p> <p>As provided by State CEQA Guidelines Section 15093, a Statement of Overriding Considerations may be adopted when a project would cause significant environmental impacts that cannot be reduced to a less-than-significant level, provided the lead agency has identified all feasible mitigation measures and alternatives and determines, based on written findings, that specific economic, legal, social, technological, or other benefits of the project outweigh the unavoidable adverse environmental effects, making those impacts acceptable.</p> <p>Additionally, Chapter 4.0, Project Alternatives, of the Draft EIR addresses a range of alternatives to the proposed project, including modified locations and a No Project Alternative. CEQA provides that the lead agency, in the Final EIR, may reject alternatives that do not satisfy project goals, do not offer substantial environmental advantages, or are infeasible given economic, environmental, or technological factors involved (see <i>Bay Area Citizens v. Association of Bay Area Governments</i> (2016) 248 Cal.App.4th 966. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>

Comment No.	Response
I15-14	<p>The commenter states that there is legal precedent that the County should prepare a Programmatic EIR to assess the cumulative impacts of related renewable energy projects in the region.</p> <p>As discussed in Global Response GR-2, Cumulative Impacts, regarding the request for the County to prepare a Program EIR related to utility-scale renewable development in the Mountain Empire subregion of Eastern San Diego County, such level of analysis is not required by CEQA. CEQA only requires environmental review when there is a specific project or policy being proposed for approval. In this case, the County is not creating a new program or plan for renewable energy—individual projects will continue to be reviewed separately under existing policies and zoning. The County previously looked into doing broader renewable energy planning through its Renewable Energy Work Plan (2013–2014) and determined that a program-level study was not necessary. Since that time, renewable projects have been reviewed individually with the level of CEQA analysis appropriate for each proposal. A new programmatic review would not add value or meet a specific CEQA need at this stage. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I15-15	<p>The commenter requests that the County reject the proposed project or approve the No Project alternative.</p> <p>Chapter 4.0, Project Alternatives, of the Draft EIR addresses a range of alternatives to the proposed project, including a No Project Alternative. CEQA provides that the lead agency, in the Final EIR, may reject alternatives that do not satisfy project goals, do not offer substantial environmental advantages, or are infeasible given economic, environmental, or technological factors involved (see <i>Bay Area Citizens v. Association of Bay Area Governments</i> (2016) 248 Cal.App.4th 966). No changes to the EIR were determined to be necessary in response to this comment.</p>
I15-16	<p>The commenter requests that the County provide an explanation as to how the location of the proposed project in addition to related utility-scale renewable energy projects in eastern San Diego County complies with the environmental justice requirements of CEQA, the County’s Climate Action Plan, and equity guidelines provided by the State of California.</p> <p>See Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice. CEQA does not specifically reference “environmental justice,” nor does it require analysis of environmental justice concerns (see <i>Golden Door Properties, LLC v. County of San Diego</i> (2020) 50 Cal.App.5th 467, 555 n.46). Instead, CEQA focuses on evaluating potentially significant environmental impacts, including those that are cumulatively considerable. Traditionally, environmental justice issues pertain to the effects of pollution on low-income communities (California Department of Justice 2012). Additionally, under the County of San Diego’s General Plan, the community of Boulevard was not designated as an Environmental Justice community in the County. As described in GR-6, comments related to social and economic issues do not specifically relate to the environmental analysis included in the Draft EIR. This response is provided for informational purposes and will be considered by the Board during the project approval process and will be made available through publication of this Final EIR. These comments do not warrant revisions to the Draft EIR.</p>
I15-17	<p>The commenter requests that the County prepare a Programmatic EIR to assess the cumulative impacts of related utility-scale renewable energy projects in the region.</p> <p>See Response I10-14 above and Global Response GR-2, Cumulative Impacts. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I15-18	<p>The commenter requests that the project should implement groundwater testing for all residential wells within half a mile of the project site.</p> <p>See Global Response GR-3, Groundwater Impacts. The County disagrees with the commenter’s assertion that additional mitigation related to hydrology and water quality is required. As provided in Section 2.4, Hydrology and Water Quality, the project would adopt mitigation measure M-HY-1, which implements flood control measures to reduce impacts associated with flood hazards and risk of pollutant release to less than significant. With regard to direct impacts to groundwater resources, and as discussed throughout the Draft EIR, the project would not rely on the use of groundwater wells as a water source. Water for the project would be purchased from the JCSD and imported to the project site by water trucks. The Project Facility Availability Water Agreement between JCSD and the applicant, dated June 28, 2022, has been included as Appendix Q to the Final EIR. As required by PDF-HY-2, the project would implement a Groundwater Mitigation Monitoring and Mitigation Plan for the JCSD wells. This project design feature would ensure that the project would not result in adverse impacts to the underground groundwater aquifers. For ease of reference, PDF-HY-2 states:</p> <p><b>Implementation of GMMP for JCSD.</b> To ensure nonpotable water purchased from the Jacumba Community Services District (JCSD) does not result in impacts to the aquifers accessed by JCSD’s nonpotable water production wells (Highland Center Well and Park Well), the Starlight Solar Developer will implement the Groundwater Mitigation Monitoring and Mitigation Plan (GMMP) for the Flat Creek watershed.</p> <p>A groundwater monitoring report will be completed by a Professional Geologist or Professional Engineer licensed in the state of California and will be submitted to County Planning and Development Services (PDS) annually no later than 28 days following the end of the calendar year. Groundwater monitoring reports should be submitted for 5 years after proposed project construction</p>

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	<p>has commenced. After 5 years, County PDS should determine if continuous reporting is required based on the effects of groundwater extraction from the previous 5 years. The annual reports will include the following information:</p> <ul style="list-style-type: none"> <li>• Groundwater-level hydrographs and tabulated groundwater-level data for each accessible well in the groundwater-monitoring network</li> <li>• Tabulated groundwater production volumes from JCSD nonpotable wells</li> <li>• Documentation of any changes in well pumping or groundwater well conditions for wells in the groundwater-monitoring network</li> <li>• Documentation of groundwater-dependent habitat monitoring, if necessary, as described in the GMMP</li> </ul> <p>If the baseline groundwater levels at the wells included in the groundwater monitoring network are exceeded by 5 feet, County PDS will be notified via letter and email within 1 working day of the exceedance, or immediately after the exceedance is recognized. Additionally, if groundwater-level thresholds at the off-site wells are exceeded by their respective thresholds, pumping of JCSD non-potable wells for the project will cease and County PDS will be notified via letter and email within 1 working day, or immediately after the exceedance is recognized.</p> <p>As stated above, the project would implement project design feature PDF-HY-2, which specifies that the County will determine if continuous groundwater monitoring and reporting is required based on the effects of groundwater extraction during the 5-year period after project construction has commenced. The County finds PDF-HY-2 sufficient to address groundwater monitoring requirements. As provided in California PRC Section 21002, CEQA does not require the adoption of additional mitigation measures for impacts already mitigated to a level that is less than significant. As such, potential impacts related to groundwater have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>
115-19	<p>The commenter requests that the project should implement a 300-foot buffer from all property lines and roads and include native landscaping to visually screen the proposed solar panels.</p> <p>See Global Response GR-1, Visual Impacts. Additional detail regarding the infeasibility of potential mitigation measures for visual resources has been added to Section 2.1 Aesthetics of the Final EIR (see revisions to page 2.1-36 and Table 8-2). Regarding native landscaping, <u>due to high winds and arid conditions of the project area, it would be infeasible to install and maintain landscaping at a large enough scale to screen the project from nearby views.</u> Further, although impacts to private views are not considered significant under CEQA and mitigations for private views are not required, the project will include project design feature PDF-AE-1, which would help screen views of the project from nearby private residences. As discussed in PDF-AE-1, the Applicant will coordinate with the resident of any existing private residence located within a distance of 500 feet of a project solar panel installation to assess possible remedies, including financial assistance, for the installation of visual screening measures, including landscape screening.</p> <p>The project, as currently proposed, does not include a uniform 300-foot buffer between the proposed photovoltaic (PV) panels and adjacent properties and roads. Rather, the project includes a minimum buffer of 30 feet, between the proposed project components and the boundaries of the project site. Further, as shown in Figure 1-3 in Chapter 1.0 of the Draft EIR, the project boundaries do not fully encompass the entire footprint of the parcels in which the project is proposed, which greatly increases the buffer distances in some areas of the project site. For example, Area B would be located over 2,000 feet east of the adjacent parcel to the west, and Area E would be located over 200 feet west of the adjacent parcel to the east. Additionally, as shown in Figure 1-6 in Chapter 1.0 of the Draft EIR, the project contains 15 cultural open space easement areas of various sizes within the project site, totaling 24.44 acres. No development or disturbance would occur within the open space easement areas. The open space easements along the edges of the site would increase the distance of the project components from the nearest adjacent parcels by between 120 feet and 500 feet in some areas, including the northwestern and southwestern edges of Area A-2, as well as the southwestern corner of Area A-1. Further, it should be noted that most existing residences in the surrounding vicinity are substantially set back from their own property lines, which increases the distance between existing residences and the proposed project components. With the exception of the residence located 150 feet west of the project site (northwest of Area A-2), all other residences would be over 400 feet away from the proposed PV panels. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
115-20	<p>The commenter requests that the County should require the project applicant to provide funding to install residential solar panels and battery systems, or microgrid expansion for nearby residents.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment. A copy of this comment letter will be included in the Final EIR, which will be provided to the County Board of Supervisors for review when the project is considered for approval. See Global Response GR-7, Non-Substantive Comments.</p>

Comment No.	Response
I15-21	<p>This comment concludes the letter and requests that the Board of Supervisors deny the proposed project.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment. A copy of this comment letter will be included in the Final EIR, which will be provided to the Board of Supervisors for review when the project is considered for approval.</p>

**From:** Mara Harris <yogaexplorer@gmail.com>  
**To:** Nicholas.Koutoufidis1@sdcounty.ca.gov  
**Subject:** [External] Starlight Solar Project Proposed in Boulevard California 2025  
**Date:** Mon, 15 Sep 2025 16:28:47 -0700

Dear Nicholas Koutoufidis:

I am writing to formally oppose the proposed Starlight Solar Project, an industrial-scale facility planned for the Hagan Ranch property on Jewel Valley Road. While renewable energy is important, this project is not an appropriate or responsible development for our community.

The Starlight Solar Project would irreversibly transform 588 acres of rural Boulevard into an industrial power plant, with 235,500 solar panels—each up to 12 feet tall—and a massive 217.4 MW/MW battery storage facility. To operate, the developer seeks a Major Use Permit that would lock our community into decades of noise, dust, traffic, groundwater depletion, and heightened fire risk.

I am writing to express my deep concern regarding the proposed Starlight Solar Project by Empire Ranch, LLC, on behalf of SDG&E, at the Hagan Ranch site on Jewel Valley Road. While renewable energy is important for our future, the scale and location of this project pose significant risks to our community, environment, and way of life.

The proposed facility would cover 588 acres of rural land with 235,500 solar panels, each up to 12 feet tall, along with a 217.4 MW battery storage facility. To sustain operations, the developer is requesting a Major Use Permit that would allow this industrial project to operate for 30+ years, drawing heavily on our local resources—including 67.9 acre-feet of groundwater annually for dust control and grading.

This is not a community-based clean energy project. Instead, it will:

\* Destroy rural character: Replacing open landscapes with an industrial operation will permanently alter the identity of Boulevard.



I16-1



I16-2

\* Raise local temperatures by 2–8°F, creating heat island effects that harm residents, crops, and wildlife.

I116-3

\* Increase wildfire danger, introducing flammable infrastructure and battery storage hazards in an already fire-prone region.

I116-4

\* Strain limited water supplies, putting our community's essential resource at risk.

I116-5

\* Cause years of dust, noise, and heavy truck traffic, degrading our air quality and daily lives.

I116-6

\* Harm wildlife and natural habitats, displacing species that depend on open land.

I116-7

\* Lower property values, while offering no tangible benefits such as lower electricity bills, local energy supply, or meaningful job creation.

I116-8

This project, as proposed, provides no direct improvements to Boulevard or its residents. It serves corporate interests at the expense of the people, land, and resources of our community. We deserve thoughtful, balanced energy solutions that respect local needs, protect our environment, and support—not undermine—our rural quality of life.

I116-9

For these reasons, I strongly oppose the approval of the Major Use Permit for the Starlight Solar Project in its current form. I respectfully urge you to reject this proposal and safeguard the land, water, and peace of Boulevard.

Mara Harris

Resident of Boulevard, California

Mara Harris  
- yoga explorer  
Women & Wellness Advocate  
Assemblage Artist - Assembling Found Objects and People  
Organic Intelligence Post-Trauma Growth Coach In Training  
direct  
619.723.0723  
\*\*\*\*\*

Blessings abound.

### 8.2.5.16 **Response to Comment Letter I16 from Mara Harris (received September 15, 2025)**

Comment No.	Response
I16-1	<p>The commenter introduces the letter and expresses their opposition to the proposed project. The commenter states that the environmental impacts resulting from implementation of the project would outweigh any potential benefits.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment. A copy of this comment letter will be included in the Final EIR, which will be provided to the Board of Supervisors for review when the project is considered for approval. Responses to the specific comments in the letter are provided below.</p>
I16-2	<p>The commenter states that the project would result in significant impacts to visual resources which would be detrimental to the character of the local community.</p> <p>See Global Response GR-1, Visual Impacts, and GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice. Comments related to social and economic issues do not specifically relate to the environmental analysis included in the Draft EIR. This response is provided for informational purposes and will be considered by the Board during the project approval process and will be made available through publication of this Final EIR. These comments do not warrant revisions to the Draft EIR. As discussed in the Draft EIR, the project would result in significant and unavoidable impacts to visual resources. Specifically, as detailed in Section 2.1, Aesthetics, the project would result in significant impacts related to Visual Character and Quality (Impact AE-1), Valued Visual Character and Image of Neighborhood or Community (Impact AE-2), and Focal and Panoramic Vistas (Impact AE-3). No feasible mitigation measures have been identified to reduce the visual impacts of the project to a less than significant level. As such, if the proposed project is approved, the County will prepare a Statement of Overriding Considerations, as required by CEQA Guidelines Section 15093. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I16-3	<p>The commenter states that the project could increase local temperatures by 2 to 8 F and expresses concern regarding the project's potential heat island effects.</p> <p>Refer to Global Response GR-4, Heat Island Effect. Given that there are no significance thresholds for the photovoltaic heat island effect and given the limited number of studies regarding this effect, there is no evidence that any possible increase in ambient temperature from the proposed project would significantly impact human health or the environment. No changes to the EIR were determined to be necessary in response to this comment.</p>
I16-4	<p>The commenter expresses concern regarding the potential for the project to increase wildfire risk.</p> <p>See Global Response GR-5, Wildfire Risks. As discussed in Chapter 1.0, Project Description, Location, and Environmental Setting, the battery energy storage system (BESS) facilities included in the proposed project would use lithium iron phosphate batteries. Lithium iron phosphate batteries have higher thermal stability and a higher thermal runaway threshold than lithium manganese cobalt batteries. As a result, lithium iron phosphate batteries are inherently safer with a lower risk of thermal runaway as compared to lithium manganese cobalt or traditional lithium-ion batteries (Evro et al. 2024).</p> <p>As detailed in the Construction Fire Protection Plan (FPP), each battery storage cabinet would have a metal frame with insulation, air conditioning, and fire suppression, with separate enclosures for the electronic controls, inverters, and rectifiers. There would be a built-in heat detection and fire protection system and a fire extinguishing system. The heat and fire detection system would be linked to an automatic inert gas suppression system within each cabinet. The containers would also have an interior aerosol fire suppression system. The National Fire Protection Association (NFPA) has developed a new Standard for the Installation of Stationary Energy Storage Systems (NFPA 855). This standard addresses the design, construction, installation, commissioning, operation, maintenance, and decommissioning of stationary energy storage systems. The system would be designed in accordance with applicable NFPA safety standards. The BESS would be sited with a setback from off-site areas as a buffer against potential wildfire ignitions. The cabinets would not be walk-in containers; thus, the battery storage cabinets would be non-habitable structures per the state and local fire codes that are in place at the time a building permit application is submitted to the County.</p> <p>The Draft EIR concludes that, with the incorporation of M-WF-1 through M-WF-6, the project would not exacerbate the risk of fire ignition at the project site; therefore, environmental impacts were determined to be less than significant. Potential environmental impacts associated with wildfire have been adequately assessed in the Draft EIR, and no new significant environmental issues have been identified. State CEQA Guidelines Section 15088(a) does not require a response to comments that do not raise significant environmental issues. Therefore, no revisions to the Draft EIR are necessary.</p>
I16-5	<p>The commenter states that the project would result in impacts to the local underground aquifers which would affect local groundwater supplies.</p>

Comment No.	Response
	<p>See Global Response GR-3, Groundwater Impacts. The project does not propose the use of any on-site wells and would therefore not result in drawdown of the local groundwater aquifer. Further, the project would not result in a significant increase in impervious surfaces or significantly alter the existing drainage pattern of the project site. As such, the project would not result in impacts related to groundwater recharge. The project would import nonpotable water for construction and fire suppression purposed from the Jacumba Community Services District (JCSD), and it would implement a Groundwater Monitoring and Mitigation Plan (GMMP) for the JCSD groundwater wells which would ensure that the project would not result in significant impacts to the local groundwater aquifer. No changes to the EIR were determined to be necessary in response to this comment.</p>
I16-6	<p>The commenter states that the environmental impacts of the project would affect the health and quality of life of local community members.</p> <p>See Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice. Potential environmental impacts of the project related to public health and the surrounding community are analyzed throughout the Draft EIR, specifically in Sections 2.5, Noise, and 2.7, Wildfire, as well as Sections 3.1.1, Air Quality, and 3.1.5, Hazards and Hazardous Materials. No changes to the EIR were determined to be necessary in response to this comment. As described in GR-6, comments related to social and economic issues do not specifically relate to the environmental analysis included in the Draft EIR. This response is provided for informational purposes and will be considered by the Board during the project approval process and will be made available through publication of this Final EIR. These comments do not warrant revisions to the Draft EIR.</p>
I16-7	<p>The commenter states that the project would impact wildlife habitats.</p> <p>The County appreciates the commenter's concern regarding biological impacts. As discussed in Section 2.2, Biological Resources, of the Draft EIR, the project could have potentially significant impacts to biological resources. However, the project would implement the following mitigation measures, to minimize impacts to biological resource to the extent feasible: M-BI-1 (Biological Monitoring), M-BI-2 (Temporary Construction Fencing), M-BI-3 (Habitat Preservation), M-BI-4 (Resource Management Plan), M-BI-5 (Avian Breeding and Special-status Wildlife Impact Avoidance), M-BI-6 (Biological Monitoring of Stormwater Pollution Prevention Plan Implementation), M-BI-7 (Prevention of Chemical Pollutants), M-BI-8 (Prevention of Invasive Plant Species), M-BI-9 (Operations and Maintenance Signage), M-BI-10 (Noise Reduction), M-BI-11 (Mitigation Measures and Design Considerations for Jurisdictional Wetlands and Waterways), M-BI-12 (Wildlife Corridor), and M-BI-13 (Special-status Plants). As concluded in Section 2.2, Biological Resources, of the Draft EIR, implementation of these mitigation measures would reduce impacts to less than significant. As such, the Draft EIR and the Biological Resources Report (Appendix D to the Draft EIR) has sufficiently analyzed potential impacts to biological resources that satisfy County requirements. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I16-8	<p>The commenter states that the project would decrease property values.</p> <p>See Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice and Response I15-2 above. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I16-9	<p>This comment concludes the letter and requests that the Board of Supervisors deny the proposed project.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment. A copy of this comment letter will be included in the Final EIR, which will be provided to the Board of Supervisors for review when the project is considered for approval.</p>

From: Dustin Valentine lovedustinvalentine@gmail.com  
To: Nicholas.Koutoufidis1@sdcounty.ca.gov, joel.anderson@sdcounty.ca.gov  
Subject: [External] Urgent Public Comment on Starlight Solar Project - Protect Our Land, Water, and Rural Character  
Date: Mon, 15 Sep 2025 19:09:24 -0700

Dear Supervisors Koutoufidis and Anderson,

I am writing to you as a resident deeply concerned about the proposed **Starlight Solar Project** on the Hagan Ranch, a massive 588-acre industrial solar and battery facility.

I17-1

I respectfully submit that this project, in its current form, poses grave and irreversible threats to our land, our water, and the rural identity of Boulevard. As such, I urge you to address the following **critical demands** before any permit or approval moves forward:

**1. 300-Foot Setbacks from Roads & Property Lines**

We demand a minimum **300-foot setback** from all property lines and public roads. This buffer is essential to mitigate visual intrusion, reduce noise, noise-induced stress, glare, light pollution, and safety concerns. At present, the project leaves our homes and community dangerously exposed to industrial-scale infrastructure.

I17-2

**2. Bury the Overhead Power Line at Tule Jim Lane**

The proposed overhead gen-tie line across Tule Jim Lane is a glaring safety hazard and a visual blight. It must be **buried underground**. Overhead lines increase the risk of wildfire ignition, pose threats to transport and local traffic safety, and are simply incompatible with the rural landscape Boulevard residents cherish.

I17-3

**3. Require Native Landscaping Around Panel Clusters**

Large clusters of PV panels require thoughtful integration into the environment. I insist that they be surrounded by **native landscaping** to support soil health, wildlife habitat, pollinators, and to break up monocultural industrial appearance.

I17-4

**4. Independent Well Testing & Ongoing Monitoring**

This project proposes using **67.9 acre-feet** of groundwater for grading and dust control. The aquifer that feeds our wells is finite and precious. We need **independent, third-party well testing before, during, and after construction**, along with long-term monitoring and enforceable remediation if our water supply is harmed. Reliance on the developer's self-monitoring is inadequate.

I17-5

**5. Highlight Fire Risks from Large-Scale Batteries & Panels**

Installing a **217.4 MW battery energy storage system** together with hundreds of thousands of solar modules introduces a dramatically elevated fire and explosion risk. Large-scale batteries have a well-documented history of catastrophic thermal events. The Draft EIR acknowledges fire as a concern, but our community cannot bear the consequences of a single failure. The project must be scaled down, reconfigured for safer designs, or better yet relocated to more suitable industrial areas.

I17-6

**6. Visual Impacts Are Significant & Unavoidable — Project Must Be Reduced**

The EIR itself concludes that visual impacts are "significant and unavoidable." That is unacceptable. We cannot accept industrial sprawl erected in our backyard under claims of "minimized height" or "mitigation." This project must be **reduced in scale** — whether by limiting acreage, removing battery fields, increasing setbacks, or re-siting to areas better suited to industrial use.

I17-7

**In conclusion:** The Starlight Solar Project, as currently proposed, risks permanent damage to our rural character, quality of life, water security, and fire safety. Even with mitigations, many

I17-8

impacts remain unavoidable. With your leadership, we can insist on meaningful changes — or push for alternatives that truly respect Boulevard’s values and environment.  
Please, ensure these demands are incorporated in any approval process, or better yet, reject this plan in favor of more responsible, community-supported, distributed renewable solutions.  
Thank you for your attention and your service to our region.

Sincerely,  
Dustin Valentine  
Resident of Boulevard, CA

↑  
**I17-8**  
(cont'd)

### 8.2.5.17 Response to Comment Letter I17 from Dustin Valentine (received September 15, 2025)

Comment No.	Response
I17-1	<p>The commenter introduces the letter and shares their personal connection to the community of Boulevard.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment. A copy of this comment letter will be included in the Final EIR, which will be provided to the Board of Supervisors for review when the project is considered for approval. Responses to the specific comments in the letter are provided below.</p>
I17-2	<p>The commenter requests that the project should include 300-foot setbacks from all property lines and roads.</p> <p>See Global Response GR-1, Visual Impacts. The project, as currently proposed, does not include a uniform 300-foot buffer between the proposed photovoltaic (PV) panels and adjacent properties and roads. Rather, the project includes a minimum buffer of 30 feet, between the proposed project components and the boundaries of the project site. Further, as shown in Figure 1-3 in Chapter 1.0 of the Draft EIR, the project boundaries do not fully encompass the entire footprint of the parcels in which the project is proposed, which greatly increases the buffer distances in some areas of the project site. For example, Area B would be located over 2,000 feet east of the adjacent parcel to the west, and Area E would be located over 200 feet west of the adjacent parcel to the east. Additionally, as shown in Figure 1-6 in Chapter 1.0 of the Draft EIR, the project contains 15 cultural open space easement areas of various sizes within the project site, totaling 24.44 acres. No development or disturbance would occur within the open space easement areas. The open space easements along the edges of the site would increase the distance of the project components from the nearest adjacent parcels by between 120 feet and 500 feet in some areas, including the northwestern and southwestern edges of Area A-2, as well as the southwestern corner of Area A-1. Further, it should be noted that most existing residences in the surrounding vicinity are substantially set back from their own property lines, which increases the distance between existing residences and the proposed project components. With the exception of the residence located 150 feet west of the project site (northwest of Area A-2), all other residences would be over 400 feet away from the proposed PV panels. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I17-3	<p>The commenter requests that the project underground the proposed power lines crossing Tule Jim Lane to reduce fire hazards, safety issues, and visual impacts.</p> <p>See Global Response GR-1, Visual Impacts. The project, as currently proposed, would not underground the entire proposed gen-tie line; however, only 100 feet of the approximately 3,500-foot-long gen-tie would be above ground. The primary reason for an overhead section crossing Tule Jim Lane is to avoid encroaching on an existing underground 138-kilovolt (kV) transmission line in Tule Jim Lane that connects to the substation. Per Section 851 of the California Public Utilities Code, San Diego Gas &amp; Electric (SDG&amp;E) must obtain California Public Utilities Commission (CPUC) approval to ensure that a possible encroachment on their facilities or equipment is not adverse to public interest. The overhead section over the road eliminates the encroachment but not the requirement for SDG&amp;E to consult with the CPUC. Also, undergrounding the proposed gen-tie line at the Tule Jim Lane overcrossing would require a full road closure during project construction, which would severely limit access to the residences along Tule Jim Lane (traffic detours would not be feasible due to the lack of improved roads in the area).</p> <p>The overhead section of the gen-tie line would not significantly increase fire or public safety hazards, because it would be designed, constructed, and maintained in full compliance with applicable California safety standards, including CPUC General Order 95, which establishes requirements for structural strength, grounding, and separation from vegetation and structures to prevent electrical faults, reduce ignition risk, and protect public safety.</p> <p>Further, the proposed gen-tie overcrossing would be visually consistent with the existing overhead power lines along Tule Jim Lane. CEQA does not require an EIR to consider alternatives that would improve a project's environmental baseline (see <i>In re Bay-Delta Programmatic Emt'l Impact Report</i> (2008) 43 Cal.4th 1143). Here, the issue is not the visual impact of overhead power lines, but whether the addition of a new overhead power line similar in form, line, color, and texture to existing overhead power lines will cause a significant new environmental impact. Therefore, the County disagrees with the commenters' assertion that undergrounding the gen-tie line at the Tule Jim Lane crossing is required because the overhead the gen-tie line would not introduce a new visual element to the area surrounding Tule Jim Lane, and it would not result in a significant new visual impact. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I17-4	<p>The commenter requests that the project should include native landscaping around the proposed solar panels.</p> <p>See Global Response GR-1, Visual Impacts. The project, as currently proposed, would not include landscaping screening. As discussed in Section 2.1, Aesthetics, of the Draft EIR, installing landscaping around the entire project site for screening purposes would be infeasible, due to the high winds and arid conditions of the area. It would be highly unlikely that new vegetation would survive at a large enough scale (i.e., grow to maturity) to screen the entire project from nearby views. Pursuant to State CEQA Guidelines Section 21002.1(b), CEQA does not require the adoption of infeasible mitigation measures. Therefore, the County disagrees with the</p>

Comment No.	Response
	<p>commenters' assertion that landscape screening must be installed around the entire project site. However, as discussed in PDF-AE-1, the Applicant will coordinate with the resident of any existing private residence located within a distance of 500 feet of a project solar panel installation to assess possible remedies, including financial assistance, for the installation of visual screening measures, including landscape screening. For ease of reference, PDF-AE-1 states:</p> <p style="padding-left: 40px;">The Applicant will coordinate with the resident of any existing (existing as of the date of this Major Use Permit Decision) private residence located within a distance of 500 feet of a project solar panel installation to assess visibility impact complaints made within 1 year from the initial operations date of the project. This assessment would include possible remedies that the Applicant may implement depending upon the level of visibility impacts occurring at the residence, including financial assistance for the installation of visual screening measures, such as landscaping or fencing. Requests for assistance can be made through a project hotline to be established by the Applicant and published on the Applicant's website.</p> <p>Therefore, through implementation of PDF-AE-1, some of the proposed project components would be screened from view. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
117-5	<p>The commenter requests that the project should implement groundwater well testing.</p> <p>See Global Response GR-3, Groundwater Impacts. The County disagrees with the commenter's assertion that additional mitigation related to hydrology and water quality is required. As provided in Section 2.4, Hydrology and Water Quality, the project would adopt mitigation measure M-HY-1, which implements flood control measures to reduce impacts associated with flood hazards and risk of pollutant release to less than significant. With regard to direct impacts to groundwater resources, and as discussed throughout the Draft EIR, the project would not rely on the use of groundwater wells as a water source. Water for the project would be purchased from the Jacumba Community Services District (JCSD) and imported to the project site by water trucks. The Project Facility Availability Water Agreement between JCSD and the applicant, dated June 28, 2022, has been included as Appendix Q to the Final EIR. As required by PDF-HY-2, the project would implement a Groundwater Mitigation Monitoring and Mitigation Plan for the JCSD wells. This project design feature would ensure that the project would not result in adverse impacts to the underground groundwater aquifers. For ease of reference, PDF-HY-2 states:</p> <p><b>Implementation of GMMP for JCSD.</b> To ensure nonpotable water purchased from the Jacumba Community Services District (JCSD) does not result in impacts to the aquifers accessed by JCSD's nonpotable water production wells (Highland Center Well and Park Well), the Starlight Solar Developer will implement the Groundwater Mitigation Monitoring and Mitigation Plan (GMMP) for the Flat Creek watershed.</p> <p>A groundwater monitoring report will be completed by a Professional Geologist or Professional Engineer licensed in the state of California and will be submitted to County Planning and Development Services (PDS) annually no later than 28 days following the end of the calendar year. Groundwater monitoring reports should be submitted for 5 years after proposed project construction has commenced. After 5 years, County PDS should determine if continuous reporting is required based on the effects of groundwater extraction from the previous 5 years. The annual reports will include the following information:</p> <ul style="list-style-type: none"> <li>• Groundwater-level hydrographs and tabulated groundwater-level data for each accessible well in the groundwater-monitoring network</li> <li>• Tabulated groundwater production volumes from JCSD nonpotable wells</li> <li>• Documentation of any changes in well pumping or groundwater well conditions for wells in the groundwater-monitoring network</li> <li>• Documentation of groundwater-dependent habitat monitoring, if necessary, as described in the GMMP</li> </ul> <p>If the baseline groundwater levels at the wells included in the groundwater monitoring network are exceeded by 5 feet, County PDS will be notified via letter and email within 1 working day of the exceedance, or immediately after the exceedance is recognized. Additionally, if groundwater-level thresholds at the off-site wells are exceeded by their respective thresholds, pumping of JCSD nonpotable wells for the project will cease and County PDS will be notified via letter and email within 1 working day, or immediately after the exceedance is recognized.</p> <p>As stated above, the project would implement project design feature PDF-HY-2, which specifies that the County will determine if continuous groundwater monitoring and reporting is required based on the effects of groundwater extraction during the 5-year period after project construction has commenced. The County finds PDF-HY-2 sufficient to address groundwater monitoring requirements. As provided in California PRC Section 21002, CEQA does not require the adoption of additional mitigation measures for impacts already mitigated to a level that is less than significant. As such, potential impacts related to groundwater have been adequately assessed in the Draft EIR and no revisions to the Draft EIR are required.</p>

Comment No.	Response
117-6	<p>The commenter expresses concern regarding the potential for the project to increase wildfire risk.</p> <p>See Global Response GR-5, Wildfire Risks. As discussed in Chapter 1.0, Project Description, Location, and Environmental Setting, the battery energy storage system (BESS) facilities included in the proposed project would use lithium iron phosphate batteries. Lithium iron phosphate batteries have higher thermal stability and a higher thermal runaway threshold than lithium manganese cobalt batteries. As a result, lithium iron phosphate batteries are inherently safer with a lower risk of thermal runaway as compared to lithium manganese cobalt or traditional lithium-ion batteries (Evro et al. 2024).</p> <p>As detailed in the Construction Fire Protection Plan (FPP), each battery storage cabinet would have a metal frame with insulation, air conditioning, and fire suppression, with separate enclosures for the electronic controls, inverters, and rectifiers. There would be a built-in heat detection and fire protection system and a fire extinguishing system. The heat and fire detection system would be linked to an automatic inert gas suppression system within each cabinet. The containers would also have an interior aerosol fire suppression system. The National Fire Protection Association (NFPA) has developed a new Standard for the Installation of Stationary Energy Storage Systems (NFPA 855). This standard addresses the design, construction, installation, commissioning, operation, maintenance, and decommissioning of stationary energy storage systems. The system would be designed in accordance with applicable NFPA safety standards. The BESS would be sited with a setback from off-site areas as a buffer against potential wildfire ignitions. The cabinets would not be walk-in containers; thus, the battery storage cabinets would be non-habitable structures per the state and local fire codes that are in place at the time a building permit application is submitted to the County.</p> <p>The Draft EIR concludes that, with the incorporation of M-WF-1 through M-WF-6, the project would not exacerbate the risk of fire ignition at the project site; therefore, environmental impacts were determined to be less than significant. Potential environmental impacts associated with wildfire have been adequately assessed in the Draft EIR, and no new significant environmental issues have been identified. State CEQA Guidelines Section 15088(a) does not require a response to comments that do not raise significant environmental issues. Therefore, no revisions to the Draft EIR are necessary.</p>
117-7	<p>The commenter requests that the total footprint of the project should be reduced to minimize potential visual impacts.</p> <p>See Global Response GR-1, Visual Impacts. A reduced project footprint was considered in the Draft EIR. The project, as currently proposed, would include 588 acres of development. However, as discussed in Chapter 4.0, Project Alternatives, of the Draft EIR, the “Reduced Development Alternative” proposes to implement a smaller version of the project. Under the Reduced Development Alternative, the development footprint would be 538 acres, a reduction of 50 acres from the proposed project. This alternative would remove approximately 50 acres of solar arrays and infrastructure in the northern portion of the project (Areas A-1 and A-2). This reduction in the development footprint would remove solar arrays from the northern side of the ridge and provide a visual buffer between the proposed solar facility, Old Highway 80, I-8, and some of the off-site private properties. CEQA provides that the lead agency, in the Final EIR, may reject alternatives that do not satisfy project goals, do not offer substantial environmental advantages, or are infeasible given economic, environmental, or technological factors involved (see <i>Bay Area Citizens v. Association of Bay Area Governments</i> (2016) 248 Cal.App.4th 966).</p> <p>With respect to aesthetics, the Draft EIR provides an extensive analysis of potential impacts to aesthetic resources and states that no feasible mitigation measures have been identified to reduce the visual impacts of the Project to a less than significant level (see Section 2.1, Aesthetics). As stated above, CEQA does not require the adoption of infeasible mitigation measures or mitigation measures that would not avoid or lessen significant environmental impacts. Here, the County has determined that no feasible mitigation measure, including increased buffer distance, would reduce visual impacts to a level that is less than significant. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
117-8	<p>This comment concludes the letter and requests that the proposed project should not be approved.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment. A copy of this comment letter will be included in the Final EIR, which will be provided to the Board of Supervisors for review when the project is considered for approval.</p>

From: Melanie Zardeneta melaniezardeneta@gmail.com  
To: Nicholas.Koutoufidis1@sdcounty.ca.gov  
Subject: [External] Jewel valley road  
Date: Mon, 15 Sep 2025 23:43:08 -0700

Mr. Koutoufidis- I am not sure if this is the correct address to be submitting my concerns of the starlight project. If not I hope that you are able to direct it to the appropriate place.

I18-1

I have several concerns regarding the project that have to do with the environment. First and foremost, after speaking with a local resident( been here since 1975!) Who also owned property 3 miles from the larger but similar solar/ battery "project". They shared with me that they use to transport their cattle (200+) during the winter and spring time to calve. After the panels were installed they could no longer take the cattle there because they were no longer breeding successfully. Once brought back to our area they were successfully calving again. This is far beyond environmental. This is putting a halt in the existence of human beings. This is the livelihood of local people being involuntarily being stripped from the hands they have sacrificed for their families. They've struggled and worked like slaves to ensure their legacy to make certain their families were safe and productive contributing people.

I18-2

I am aware that this is not a concern of sdge or Mr. Häagen. Or Mr Whelan or yours for that matter. But it matters to people like them. The only reason they've been able to fight projects and developers and the county is because of their dedication and commitment to their ways of life.

Another concern of mine is the close proximity of this project in reference to my property. I have seen zero benefits to any of our community members. If you would try to be mindful of the facts that you are imposing on our reasons for living out here. Just as people pay to live oceanfront we pay to live in the rural natural undeveloped non commercialized region. We drive an hour either direction to grocery shop just to be able to look out our windows and not see traffic lights and people. Or hear the noise of construction or sirens or street lights. Our insurance costs are aiding in your plans to eradicate any people who might object to projects like these. Make the people a realistic offer that we can't turn down..make it worth the possible fire risk. Worth the eyesore. Worth the heat. Worth our cattle not being able to breed to sustain people that drive an hour to get ground beef.

I18-3

I would hope that your project would offer at least 300 feet of space between our new unnatural views. Offer property a water tank for water suppression. To give us a slight chance of fighting a fire when it does start. There is no water that would fight the type of fire that would be fightable from this project which would make it even more appealing or beneficial or worth anyone out here even considering this project

I18-4

I18-5

Im out of time and Want to make sure that this is submitted in time. Whoever I do have several other ideas can't concerns regarding The forward progress of this project. Please feel free to contact me At this email address or my cell phone 6 1 9 4 5 6 1 9 8 8. Thank you very much for reading this and considering my ideas and issues. I understand this is a big money making opportunity for everybody other than The people of our community who live here.

I18-6

Melanie Hayden

### 8.2.5.18 **Response to Comment Letter I18 from Melanie Zardeneta (received September 15, 2025)**

Comment No.	Response
I18-1	<p>This comment introduces the letter.</p> <p>This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment. A copy of this comment letter will be included in the Final EIR, which will be provided to the Board of Supervisors for review when the project is considered for approval. Responses to the specific comments in the letter are provided below.</p>
I18-2	<p>The commenter claims that solar projects can harm the reproductive capability of cattle and expresses concern regarding the implications this would have on local ranchers.</p> <p>The commenter does not provide any evidence to support the claim that the project would result in impacts to cattle ranching or other agricultural uses in the area. Further, the nearest active cattle ranch to the project site is the Rough Acres Ranch, located approximately 3 miles to the north. No other active agricultural use occurs in the vicinity of the project site. See Section 3.2.1, Agriculture and Forestry Resources in the Draft EIR for the analysis of project impacts to agricultural resources.</p> <p>Additionally, see Global Response GR-4, Heat Island Effect. Given that there are no significance thresholds for the photovoltaic heat island effect and given the limited number of studies regarding this effect, there is no evidence that any possible increase in ambient temperature from the proposed project would significantly impact human health or the environment. No changes to the EIR were determined to be necessary in response to this comment.</p>
I18-3	<p>The commenter states that the project would affect the health and quality of life of local community members. See Global Response GR-6, Fire Insurance, Socioeconomic Impacts, and Environmental Justice. Potential environmental impacts of the project related to public health and the surrounding community are analyzed throughout the Draft EIR, specifically in Sections 2.5, Noise and 2.7, Wildfire, as well as Sections 3.1.1, Air Quality and 3.1.5, Hazards and Hazardous Materials. No changes to the EIR were determined to be necessary in response to this comment. As described in GR-6, comments related to social and economic issues do not specifically relate to the environmental analysis included in the Draft EIR. This response is provided for informational purposes and will be considered by the Board during the project approval process and will be made available through publication of this Final EIR. These comments do not warrant revisions to the Draft EIR.</p>
I18-4	<p>The commenter requests that the project should include 300-foot setbacks from all property lines and roads. See Global Response GR-1, Visual Impacts. The project, as currently proposed, does not include a uniform 300-foot buffer between the proposed PV panels and adjacent properties and roads. Rather, the project includes a minimum buffer of 30 feet, between the proposed project components and the boundaries of the project site. Further, as shown in Figure 1-3 in Chapter 1.0 of the Draft EIR, the project boundaries do not fully encompass the entire footprint of the parcels in which the project is proposed, which greatly increases the buffer distances in some areas of the project site. For example, Area B would be located over 2,000 feet east of the adjacent parcel to the west, and Area E would be located over 200 feet west of the adjacent parcel to the east. Additionally, as shown in Figure 1-6 in Chapter 1.0 of the Draft EIR, the project contains 15 cultural open space easement areas of various sizes within the project site, totaling 24.44 acres. No development or disturbance would occur within the open space easement areas. The open space easements along the edges of the site would increase the distance of the project components from the nearest adjacent parcels by between 120 feet and 500 feet in some areas, including the northwestern and southwestern edges of Area A-2, as well as the southwestern corner of Area A-1. Further, it should be noted that most existing residences in the surrounding vicinity are substantially set back from their own property lines, which increases the distance between existing residences and the proposed project components. With the exception of the residence located 150 feet west of the project site (northwest of Area A-2), all other residences would be over 400 feet away from the proposed PV panels. No changes to the Draft EIR were determined to be necessary in response to this comment.</p>
I18-5	<p>The commenter requests that the project should offer each adjacent property a water tank for fire suppression. Properties within the project area that include residential buildings are already required by the County to have fire suppression water tanks on-site. Additionally, see Global Response GR-5, Wildfire Risks. As detailed in the Construction Fire Protection Plan, to provide sufficient fire suppression capabilities, the project would have six 10,000-gallon water tanks with a flow of at least 250 gallons per minute (gpm), and fire department connections would be available. Water would be stored in aboveground tanks complying with NFPA 22, Standard for Water Tanks for Private Fire Protection. A procedure for ongoing inspection and maintenance of tanks would be in place. The tank and fire engine connections would be located on the side of the access driveways. The width of the driveway at the water tank location would be at least 18 feet wide (travel width), plus an additional 10 feet; this width would be used for 50 feet of the driveway's length to allow for fire engines to park and connect to the tank while leaving the road open. The tanks would be labeled "Fire Water: 10,000</p>

Comment No.	Response
	<p>gallons." The Construction FPP concludes that the six 10,000-gallon water tanks would effectively reduce the probability of new ignitions and fire spread from the project. For clarity, water stored in these tanks is not intended to extinguish a battery fire within a storage container; rather, consistent with fire-service practice for BESS incidents, water would be deployed for exposure protection and containment (e.g., cooling adjacent equipment/structures, wetting fuels within Fuel Modification Zones, and protecting life safety) to prevent fire spread to other batteries and to avoid off-site wildfire ignition. Accordingly, the on-site water supply functions as a measure to reduce the potential for off-site fire spread and to protect people and property, not as the primary extinguishing agent for a storage container level thermal runaway. No changes to the EIR were determined to be necessary in response to this comment.</p>
118-6	<p>This comment concludes the letter. This is not a comment on the analysis contained in the EIR; therefore, a response is not necessary, and no changes to the EIR were determined to be necessary in response to this comment.</p>

**From:** [a345589144@fastmail.fm](mailto:a345589144@fastmail.fm)  
**To:** [Koutoufidis, Nicholas](#)  
**Subject:** [External] Re: Notice of Availability for the Draft EIR for the Starlight Solar Project (PDS2022-MUP-22-010)  
**Date:** Friday, August 1, 2025 7:46:22 AM

Nicholas, hi, my name is Nandor Nevai

I am a property owner with 40 acres there in Boulevard.  
My parcel is basically a square shape, west of Tule Jim Road, with the northwest corner being at that point where Fisher Road turns a corner north into McCain Lane.  
I have maps of the proposed Solar installation from years ago.  
I just wanted to notify you that my parcel is for Sale (there's a For Sale sign on it) In case the Solar people are interested.  
Thanks, NN

I1-1

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[a345589144@fastmail.fm](mailto:a345589144@fastmail.fm)

On Thu, Jul 31, 2025, at 6:53 PM, Koutoufidis, Nicholas wrote:

Hello,

Please see the attached Notice of Availability for the Draft Environmental Impact Report (DEIR) for the Starlight Solar project (PDS2022-MUP-22-010).

I am also reaching out to make sure that you receive a link to the DEIR public disclosure website below for the Starlight Solar project. Hard copy notices have also been mailed out to the individuals that previously provided mailing addresses.

Public Disclosure Website:  
[Starlight Solar \(sandiegocounty.gov\)](http://Starlight Solar (sandiegocounty.gov))

Please feel free to contact me if you have any questions.

Thank you,

**Nick Koutoufidis, MBA**  
Land Use & Environmental Planner | He/Him/His  
County of San Diego | Planning & Development Services  
Phone: (619) 356-8348 | Email: [Nicholas.Koutoufidis1@sdcounty.ca.gov](mailto:Nicholas.Koutoufidis1@sdcounty.ca.gov)  
**New Number: (619) 340-5481**

**Attachments:**

- Starlight Solar (PDS2022-MUP-22-010) Notice of Availability.pdf

**From:** [carl3wooddesign@gmail.com](mailto:carl3wooddesign@gmail.com)  
**To:** [Koutoufidis, Nicholas](mailto:Koutoufidis.Nicholas)  
**Cc:** [Syda Stark; carlandersoniii@yahoo.com](mailto:Syda Stark; carlandersoniii@yahoo.com)  
**Subject:** [External] EIR Starlight Solar Project  
**Date:** Friday, August 8, 2025 12:12:47 PM

I would like the following concerns addressed.

- Water run-off mitigation. I 12-1
- Microclimate changes. I 12-2
- (Higher temperatures) I 12-3
- Flight path disruption I 12-4
- Limited water held for fire suppression, we need alot more than only 6 tanks. I 12-5
- Established of test wells on site, and quarterly testing for aquifer changes and the possible release of toxic chemicals. I 12-6
- The destruction of plant and wildlife and displacement of their natural habitat. Which is potentially irreversible. Some pants take generations to cultivate under pristine conditions. I 12-7
- High fire risk zone, the latest could potentially release even more toxins into the environment if the facility catches fire. I 12-8
- Air and sound pollution (humming noises) I 12-9
  
- Other questions. I 12-10
- Solar panel manufacturer.
- Battery fire suppression system

Carl Anderson III  
619-240-4575  
Boulevard CA.

[Yahoo Mail: Search, Organize, Conquer](#)

From: Jacquelyn Valadez valadezj8872@gmail.com  
To: nicholas.koutoufidis1@sdcounty.ca.gov  
Subject: [External] Proposed Starlight Solar Project in Boulevard  
Date: Mon, 11 Aug 2025 19:26:09 -0700

Hello,

I am a resident of Boulevard, CA, and I am writing to raise serious concerns about the proposed **Starlight Solar Project**(Project No. PDS2022-MUP-22-010), which is currently under review by the County.

I 13-1

Our rural community, already underserved in terms of health services and emergency infrastructure, faces several **direct public health threats** from this project:

\*

**Air quality risks** due to construction-related **dust and diesel emissions**, especially hazardous in our high-wind region where many residents have asthma, COPD, or other respiratory issues.

I 13-2

\*

**Groundwater depletion**, with unknown impacts on **residential and agricultural wells** that are the only water source for most of us.

I 13-3

\*

**Fire risk and toxic exposure** from a large **lithium-ion battery energy storage system (BESS)** proposed in a known high fire severity zone.

I 13-4

\*

**Lack of medical infrastructure and emergency access** in the event of fire, battery failure, or evacuation.

I 13-5

These threats raise environmental justice concerns. We are a **small, underrepresented community** made up of seniors, tribal members, and low-income families who will bear the brunt of any mistakes or oversights.

I 13-6

I respectfully request that:

\*

Your department conduct a **public health risk review** of the project,

\*

Engage in the CEQA review process,

\*

And consider community engagement to hear from local residents directly.

Please help us protect the health and safety of our people.

I 13-7

Sincerely,

Jacquelyn Valadez  
Boulevard, CA 91905  
(619)565-4173

**From:** [Thomas Wall](#)  
**To:** [Koutoufidis, Nicholas](#)  
**Subject:** [External] Fwd: Formal Public Comment – Opposition to the Starlight Solar Project  
**Date:** Friday, August 15, 2025 2:23:43 PM  
**Attachments:** [DE558855-C5F2-46B2-A395-89EF039DE815.jpeg](#)  
[93C99FF3-2163-498A-A43D-F7E925968F1B.jpeg](#)

---

**I included the photos at end so you have clarity and understanding about the precious resources we are protecting.**

---

**Dear Mr. Koutoufidis,**

As a long-time resident of Boulevard, I am writing to express my strong and heartfelt opposition to the proposed **Starlight Solar Project** and to formally submit my public comment on the Draft Environmental Impact Report (EIR).

I4-1

While I support clean energy, I do not support sacrificing our community’s land, water, and safety for an energy project that provides us **no direct benefit**. This project is the wrong solution in the wrong place—and it sets a dangerous precedent for rural communities across San Diego County.

---

**My major concerns include:**

I4-2

**Water Supply & Aquifer Risk**

The EIR’s claim that the Jacumba Community Services District will supply water has been publicly denied by the district itself. This is a glaring flaw in the report. Our shared aquifer is already stressed, and this project threatens the **drinking water wells that our families and farms depend on**.

**Heat Island Effect & Long-Term Climate Impact**

I4-3

Scientific studies show that utility-scale solar farms like this can **increase local temperatures by 2–8°F**. In a region already facing drought and extreme heat, this will create serious consequences for wildlife, agriculture, and human health. We must think beyond today. With **global temperatures rising**, how can we justify heating this land even more?

**Wildfire Risk**

I4-4

The addition of a 217 MW battery storage facility introduces major fire risks. Even with mitigation, the potential for **thermal runaway fires** in a dry, rural environment like Boulevard is dangerous—and deeply irresponsible.

**Habitat Loss & Wildlife Disruption**

I4-5

This project would destroy hundreds of acres of habitat and **fragment critical wildlife**

**corridors**, permanently impacting sensitive species. Once this land is industrialized, it will never be the same.

↑ I4-5  
↓ (cont'd)

### Water Runoff & Erosion

Grading and covering the land with solar panels and roads will dramatically **increase runoff, erosion, and flood risks**, while reducing natural groundwater recharge—an outcome with long-term consequences for the entire watershed.

I4-6

### Noise & Light Pollution

Construction noise, humming inverters, and 24/7 security lighting will disrupt both **rural peace and native ecosystems**. Residents and wildlife alike will suffer.

I4-7

### Visual Impacts & Rural Degradation

Even the EIR admits that this project will have **significant and unavoidable aesthetic impacts**. The vast sea of metal panels and fencing will permanently damage the natural beauty of our area and the views that define our community.

I4-8

### Property Value Loss

Turning a rural-agricultural zone into an industrial corridor will likely drive down home values and destabilize the character of our neighborhoods.

I4-9

---

## There Are Smarter Solutions

Instead of disturbing our land and water, we should be investing in **better, lower-impact options**—like **solar rooftops, school and warehouse canopies, and the thousands of underused parking lots across San Diego County**.

But utility companies like **SDG&E make most of their profits by building infrastructure to transmit electricity over long distances**—not by encouraging local, distributed solar. This is why they continue to push projects like this one, which benefit their bottom line at the expense of **our land, our health, and our shared future**.

If we give in now, these industrial projects will continue spreading across rural areas—destroying one ecosystem at a time. We cannot allow that.

I4-10

---

**We need to be smart, and we need to be ethical.** Rural communities like ours are not empty spaces to be sacrificed for energy profits. We are real people living close to the land, raising families, and stewarding this place for future generations.

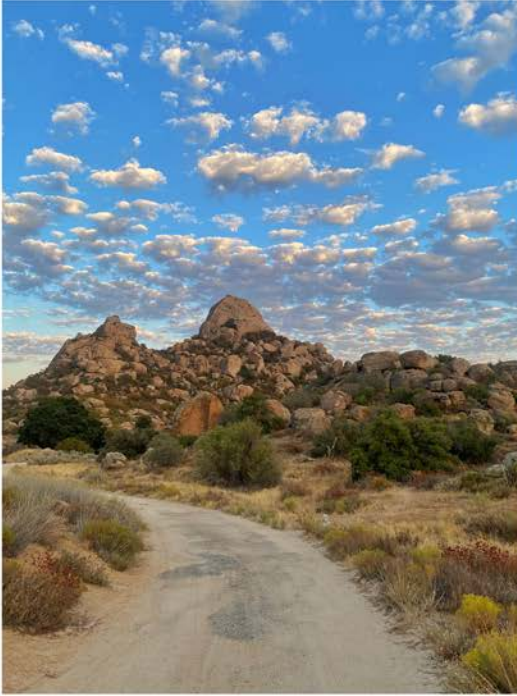
I urge you to **deny approval of the Starlight Solar Project** or, at the very least, require a **fully revised and recirculated EIR** that accurately reflects these grave environmental and community consequences.



Let's protect what matters—our land, our water, and our future.

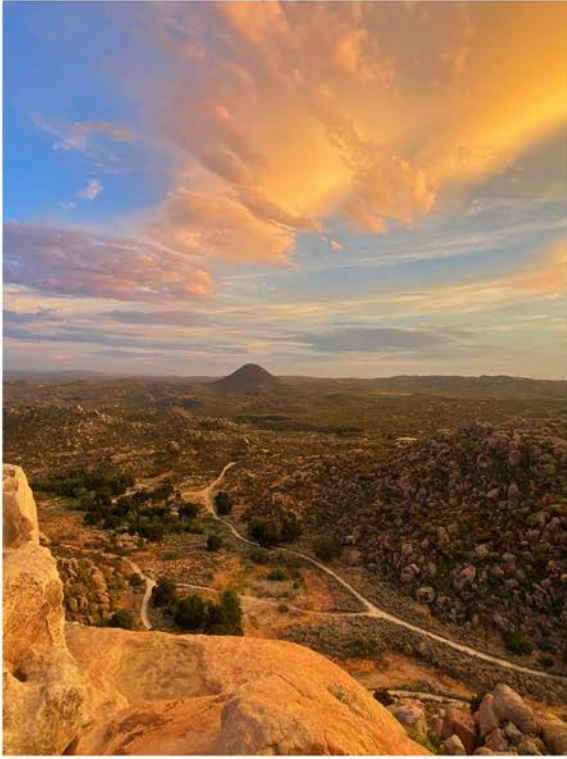
Sincerely,  
**Thomas Wall**  
Boulevard, CA Resident

Please confirm receipt of this public comment



I4-10  
(cont'd)

I4-11



I4-12

**From:** [Earl Goodnight](#)  
**To:** [Koutoufidis, Nicholas](#)  
**Subject:** [External] Starlight Solar comment letter  
**Date:** Thursday, August 21, 2025 12:48:36 PM  
**Attachments:** [Goodnight's comment letter.docx](#)

---

Hi Nick,  
Please accept and log the attached Starlight Solar comment letter.

**I I5-1**

Have a safe day,  
Earl and Beverly Goodnight



VINCE NICOLETTI  
DIRECTOR

PLANNING & DEVELOPMENT SERVICES  
5510 OVERLAND DRIVE, SUITE 210, SAN DIEGO, CALIFORNIA 92123  
(858) 505-6445 General • (858) 694-2705 Codes Compliance  
(858) 565-5920 Building Services

STARLIGHT SOLAR PROJECT DRAFT EIR  
DRAFT EIR PUBLIC MEETING -AUGUST 7, 2025  
COMMENT SHEET

**Chapter 2, Section 2,1      Aesthetics**

There is a residence within 200 feet of the northwest corner of the project. What will be done to reduce the visual impact to this home owner? The alternate plan layout removes the panels to the east but the south located panels remain too close. Additionally the view from our residence looking east, within less than 1/2 mile, will have solar panels in our view starting at Jewel Valley Road mile marker 1.0 to mile marker 1.4 (photo looking east is included for clarification). In reviewing the provided before and after photos, none were taken near residences. The main concern was views from major roadways that would affect passing traffic.

I  
15-2  
I  
15-3  
I

Solar generation of electricity is the best clean energy option for our region, but should be placed in an area that doesn't infringe on neighbors or impact the panoramic views of the region.

I  
15-4  
I

This being said the Starlight Solar's 20mw defies both neighbors and aesthetics. If this section of the project was moved to the 80mw group, these two problems would be eased.

**Chapter 3, Section 3.1.9      Transportation and Traffic**

A traffic issue needs to be addressed. Currently our family and nine other residents use Jewel Valley Way to access Jewel Valley Road. At this intersection north bound traffic on Jewel Valley Road approach Jewel Valley Way as a blind intersection. The speed limit on Jewel Valley Road is 55 miles per hour. Local residents are aware of the dangerous intersection and during normal traffic conditions the risk is minimal. However, the additional construction traffic created by this project will accelerate the risk of a collision at the intersection.

I  
15-5  
I

It is essential that a comprehensive traffic management plan be implemented, should construction proceed, including clear signage, reduced speed limits near the intersection, and supplying a traffic control (flag person) near the intersection. Additionally, open communication with residents about construction timelines would help ensure the safety and peace of the community.

I  
15-6  
I

On a broader scale, I urge decision makers to weigh the undeniable benefits of solar energy against the importance of thoughtful site placement and community impact. With careful planning and genuine engagement, our region can lead in clean energy innovation while preserving the character and safety of our neighborhoods.

I  
15-7  
I

The house on the left is in the northwest part of the Starlight project, near mile marker 1.0. The blue line represents Jewel Valley Road. Solar panels will cover nearly 0.4 miles going south (right in the picture).



View looking east from 1902 Jewel Valley Lane

I5-3  
(cont'd)

Earl & Beverly Goodnight

1902 Jewel Valley Lane  
Boulevard. CA 91905

**From:** Julita Rummler <litarummler@hotmail.com>  
**To:** "nicholas.koutoufidis1@sdcounty.ca.gov"  
<nicholas.koutoufidis1@sdcounty.ca.gov>  
**Subject:** [External] NO STARLIGHT SOLAR-protect Boulevard  
**Date:**

PLEASE, please, no starlight solar in Boulevard, CA, our home area.

I I6-1

Thank you.  
Julita Rummler

Get [Outlook for iOS](#)

**From:** Mikayla Brennan <mikaylab11204@gmail.com>  
**To:** nicholas.koutoufidis1@sdcounty.ca.gov  
**Subject:** [External] Starlight Solar Project - Boulevard CA  
**Date:**

Dear Nicholas,

My name is Mikayla, and I've grown up in the Boulevard community. I went to high school out here and I love the scenic area that my parents chose to buy a house. The Starlight Solar Project would bury an overhead power line at Tule Jim Lane which would negatively impact the environment. This project includes a three hundred foot setbacks from all property lines and roads. It's also going to require native landscaping around the panel clusters. The visual impacts alone of this monstrous project are devastating. We moved out here to be away from the city, and the pollution. This project is decimating the natural flora and fauna. Let alone the damage this project will have on the water systems and aquifer. Everyone who lives in Boulevard and the surrounding areas relays on the ground water being safe to drink when it comes out of our wells and this project jeopardizes that. And with fire insurance already on the rise, this project will raise premiums even higher, pricing people out of their own homes. As well as the pollution and damage when the fires do happen. I strongly urge you to do whatever you can to stop or at least minimize this dangerous project.

I 17-1  
I 17-2  
I 17-3  
I 17-4  
I 17-5  
I 17-6  
I 17-7  
I 17-8  
I 17-9

Thank you for your time,  
Mikayla Brennan

**From:** Dan Grunow <dangrunow@gmail.com>  
**To:** nicholas.koutoufidis1@sdcounty.ca.gov  
**Subject:** [External] Comments on proposed starlight solar project in Boulevard  
**Date:**

Good afternoon Mr Koutoufidis,

I am writing in regard to the proposed starlight solar project in Boulevard. I was disappointed to hear of the project as well as several others that are being proposed. My concerns revolve around what removing these large swathes of native habitat will do to the sensitive wildlife such as burrowing owls and kangaroo mice. I am also concerned about how this project will affect our ground water quality as many of these projects utilize chemicals that are known carcinogens to reduce weed growth.

I 18-1  
I 18-2  
I 18-3

I understand that this project will likely be approved based on what we saw unfold with the solar project in our neighboring town of Jacumba. My requests would be for you to consider.

I 18-4

My request would be that the developer be required to provide ongoing independent well water testing for aquifer protection.

I 18-5

It would also be helpful to the wildlife if the developer was required to only disturb and remove the native plantings in the areas of the panels. Ideally there would be native landscaping completed upon completion of the project to shield the panels in brow corridors.

I 18-6

Thank you very much for your consideration in supporting our small community.

I 18-7

Dan Grunow  
858-405-3164  
39211 highway 94  
Boulevard CA 91905



VINCE NICOLETTI  
DIRECTOR

PLANNING & DEVELOPMENT SERVICES  
5510 OVERLAND DRIVE, SUITE 210, SAN DIEGO, CALIFORNIA 92123  
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(858) 565-5920 Building Services

STARLIGHT SOLAR PROJECT DRAFT EIR  
DRAFT EIR PUBLIC MEETING – AUGUST 7, 2025  
COMMENT SHEET

MY COMMENTS ARE ATTACHED -  
THANK YOU.  
→

Submit by Mail, Fax or Email. Comments must be received no later than September 15th, 2025 at 4:00 p.m.

Please submit comment to:  
Nick Koutoufidis  
County of San Diego  
Planning and Development Services  
5510 Overland Ave., Suite 210  
San Diego, CA 92123  
Email: [Nicholas.Koutoufidis1@sdcounty.ca.gov](mailto:Nicholas.Koutoufidis1@sdcounty.ca.gov)

W.K.M. 9-12-25  
Commenter Signature, Date

KEN KRAMER  
Print Name

6245 FERNWOOD DRIVE  
Address

LA MESA, CA 91942  
City, State, Zip Code

I9-1

My name is Ken Kramer. For nearly 50 years I have told stories on San Diego radio and television about the natural beauty and historical legacy of our county. The backcountry around Boulevard is an extraordinary source for those stories and a pristine treasure that we are all proud of.

I  
19-2  
I

I am a frequent and joyous visitor to my friends who live in this lovely area. To even imagine it marred with acres of solar panels is simply unthinkable.

I  
19-3  
I

I understand the mandate San Diego County must meet to reduce greenhouse emissions. But in what universe do intelligent, thinking decision makers opt to place an industrial solar power generating complex in paradise?

I've tried to think about it from every angle. I really have. Are there not many times more acres of paved parking lots around arenas and stadiums in urban settings from one end of our county to the other that could be covered and outfitted with solar panels for a fraction of a fraction of the cost? Look at the expense of transporting generated power from far east county to where it will be used.

I  
19-4  
I

Ultimately the solution is simple. Create rooftop solar generated mini grids within communities. Place battery storage facilities behind the corresponding neighborhood fire stations. Think ahead, think smart.

Instead, we're going to despoil a magnificent, pristine, rural, and irreplaceably precious part of our county? We're going to create light pollution in a dark-sky celestial wonderland? We're going to disrupt the quiet of nature by generating noise and electrical hum? We're going to string high-tension power lines across vast miles of our beautiful back country?

I  
19-5  
I  
19-6  
I  
19-7  
I

What future stories will I be telling my listeners and viewers about this area? What it is...or what it was?

I  
19-8  
I

**From:** Miles Maeda <milesmaeda@gmail.com>  
**To:** Nicholas.Koutoufidis1@sdcounty.ca.gov  
**Subject:** [External] Starlight Solar Project Must Be Reduced  
**Date:** Sun, 14 Sep 2025 08:57:37 -0700

Dear Supervisor Koutoufidis,

I write to you as a concerned resident of Boulevard deeply worried about the proposed Starlight Solar Project. While I support clean energy, this project as currently proposed poses serious threats to our land, water, safety, and rural way of life. I urge you to insist on significant modifications. Or in the absence of those, reject or greatly reduce the project. Below are the issues I see must be addressed.

I10-1

1. Project needs to be 300 feet away from all property lines & roads  
The proposed solar arrays, battery storage, access roads, fencing, and all supporting infrastructure must be set back at least 300 feet from property lines of private homes and from public roads. This buffer is critical to protect neighbors from noise, glare, visual intrusion, health risks, and risk in case of fire or other emergencies.

I10-2

2. All overhead power lines at Tule Jim Lane need to be buried  
The project proposals admit that there will be one overhead crossing of power lines at Tule Jim Lane. That crossing poses visual, safety, and wildfire risk. All transmission / gen-tie lines in that area, especially crossing Tule Jim Lane, should be buried underground. Overhead wires are more exposed to wind, fire, and pose a hazard; they should not cut through rural landscape with roadways and homes.

I10-3

3. Necessity of native landscaping around panel clusters  
Around all solar panel clusters, infrastructure pads (inverters, transformers, battery storage), fencing, and equipment, there needs to be landscaping composed of native plant species. This should act as visual screening, help soil stability, support biodiversity, reduce dust, and maintain the rural character. Non-native or invasive species absolutely need to be avoided. Also, the landscaping should be well maintained over time, with clear enforceable standards.

I10-4

4. Require independent well testing & ongoing monitoring  
The project will draw on groundwater and has potential to disrupt aquifers, affect neighboring wells, and degrade water quality. Before

I10-5

construction begins, independent baseline testing of wells in surrounding properties must be done (including quantity, depth, water levels, and water quality). Then there must be ongoing monitoring for impacts (e.g. depletion, contamination). There should be legally binding remediation protocols in case harm is found.

5. Threat of fire risks from large-scale batteries & panels

The Battery Energy Storage System (BESS) of ~217.4 MW proposed is large, and battery failures can lead to intense fires, which are hard to extinguish. Solar arrays and infrastructure can also act as ignition sources or increase fuel continuity. Given that much of this acreage is in a Very High Fire Hazard Severity Zone (as CEQA acknowledges), the fire risk is real and serious. The design must include robust fire prevention, mitigation, emergency response plans, and ensure that local fire departments have adequate capacity and access. Without those, the project is a grave danger to lives, property, wildlife, and ecosystem.

6. Project must be reduced due to its visual impact

Even with proposed mitigation, the sheer scale—hundreds of acres, 235,000+ PV modules up to 12 feet tall, large battery storage infrastructure, access roads, fencing, lighting, etc.—make it impossible to hide the visual damage. The rural vistas, openness, dark skies, natural tones of our land will be altered permanently. Because these impacts are substantial and cannot be fully mitigated, the only responsible path is to reduce the project’s footprint: fewer acres, lower height, less battery capacity, less visual mass. A toned-down version may still serve energy goals without sacrificing the character of Boulevard and the health of its land and people.

Why all of this matters:

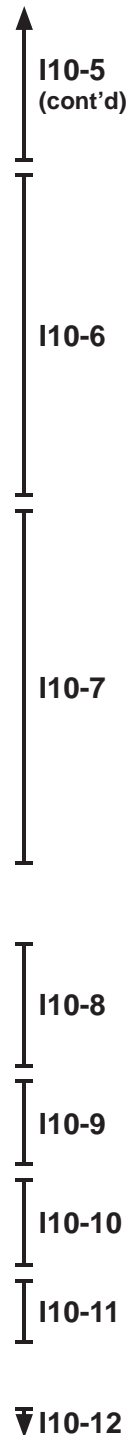
\* Our wells and surface water are precious and fragile. Damage to aquifers means loss of drinking water or major costs to repair or adapt.

\* Our rural character is not just aesthetic, it’s tied to our way of life, our identity, our property values, mental health, quality of life. Once lost, it doesn’t come back.

\* Fire risk in San Diego County is not hypothetical. We cannot add thousands of high-voltage, flammable components without fully assuming the burden.

\* Visual intrusion, noise, glare, traffic, dust... these aren’t just nuisances; over time, they degrade health, well-being, peace, safety.

Conclusion:




I urge you, as County Supervisors, to use your authority to demand these strong protections. Please insist on:

- \* 300 ft setbacks from all property lines & roads
- \* Burial of overhead power / gen-tie lines, especially at Tule Jim Lane
- \* Native landscaping screening of all solar / battery / support infrastructure
- \* Independent, baseline and ongoing well testing & monitoring
- \* Comprehensive fire safety design, mitigation, and emergency capacity
- \* A significantly scaled-down version of the project so that the remaining visual, environmental, and safety impacts are truly acceptable to our community



**I10-12  
(cont'd)**

Thank you for your attention and service. I trust you will listen to the residents of Boulevard, weigh the long-term impacts, and protect our land, water, and rural character while still advancing renewable energy in the ways that are safe, responsible, and community-guided.



**I10-13**

Sincerely,  
Miles Maeda  
Boulevard, CA

**From:** [Weena Joshi](#)  
**To:** [Koutoufidis, Nicholas](#)  
**Subject:** [External] PUBLIC COMMENT OPPOSING STARLIGHT SOLAR PROJECT  
**Date:** Monday, September 15, 2025 1:31:02 PM

---

**PUBLIC COMMENT OPPOSING STARLIGHT SOLAR PROJECT**

**Major Use Permit Application - San Diego County Planning Commission**

**Submitted by:** Weena Joshi

**Submitted to:** Nicholas Koutoufidis and San Diego County Planning & Development Services

**Date:** September 15, 2025

**Property Address:** 1594 Jewel Valley Road Boulevard, California 91905

**Project:** Starlight Solar Project, APNs 612-082-12 and others

---

**EXECUTIVE SUMMARY**

I respectfully urge the San Diego County Planning Commission to **DENY** the Major Use Permit for the Starlight Solar Project. This 588-acre industrial development represents an environmental injustice that disproportionately burdens rural communities while failing to adequately address climate change in an equitable manner. The project's significant environmental impacts, particularly to visual resources, biological habitat, fire safety, water management and community well-being, outweigh any purported benefits.

I11-1

---

**1. ENVIRONMENTAL JUSTICE AND DISPROPORTIONATE IMPACTS ON RURAL COMMUNITIES**

**Shifting Climate Burden to Vulnerable Communities**

The Starlight Solar Project exemplifies environmental injustice by transferring the responsibility for San Diego County's climate action goals to rural, under-resourced communities. While urban areas continue high-consumption lifestyles, rural Boulevard residents—with a population of only 410 people—are forced to bear the environmental costs of large-scale renewable energy development.

I11-2

**Lack of Community Resources and Voice**

Boulevard lacks the political and economic resources to adequately oppose this development. The community has no incorporated municipal government, limited public services, and residents lack the financial means to hire expert consultants to counter the developer's well-funded environmental reports. This power imbalance exemplifies environmental racism and classism.

I11-3

**Cumulative Environmental Burden**

I11-4

As documented in Table 1-4 of the DEIR, Boulevard is already bearing a disproportionate burden of renewable energy development, with multiple solar and wind projects approved or under construction nearby. This cumulative impact transforms a rural residential area into an industrial energy sacrifice zone.

I11-4  
(cont'd)

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## 2. MASSIVE DESTRUCTION OF PRISTINE DESERT CHAPARRAL ECOSYSTEM

### Scale of Environmental Destruction

The project will destroy 561 acres of largely pristine desert chaparral habitat through "clearing and grubbing." This represents an irreversible loss of native ecosystem that has developed over centuries in this arid environment.

I11-5

### Biological Resource Impacts

Despite claims of mitigation, the project will fragment critical wildlife corridors and destroy habitat for special-status species. The 447.93-acre "biological open space easement" cannot compensate for the direct habitat loss and fragmentation caused by industrial development.

I11-6

I11-7

### Heat Island Effect

The project will create a heat island effect by replacing 561 acres of transpiring vegetation with heat-absorbing solar panels and concrete, increasing local ground and air temperatures (some studies suggest up to 3–4 °C) that will further stress remaining wildlife and alter the natural desert ecosystem.

I11-8

[The Photovoltaic Heat Island Effect: Larger solar power plants increase local temperatures | Scientific Reports](#)

### Inadequate Mitigation

Off-site mitigation cannot restore the ecosystem services, wildlife corridors, and habitat connectivity that will be permanently destroyed. The project violates the principle of avoiding impacts rather than relying on questionable mitigation measures. Off-site mitigation cannot compensate for the direct destruction of on-site habitat because preserving already undisturbed land elsewhere does not replace the lost ecosystem functions, wildlife corridors, and habitat connectivity that will be permanently severed at this specific location.

I11-9

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## 3. SEVERE VISUAL AND SCENIC RESOURCE IMPACTS

### Industrialization of Rural Landscape

The project will transform 588 acres of natural desert landscape into an industrial facility with:

- 235,516 solar panels up to 12 feet high

I11-10

- Industrial fencing up to 7 feet with barbed wire
- Massive battery storage containers
- 50-foot transmission poles
- Industrial access roads throughout

I11-10  
(cont'd)

**Permanent Scenic Degradation**

The visual impact will be permanent and irreversible, fundamentally altering the rural character that residents moved to Boulevard to enjoy. The project site is visible from surrounding residential properties and recreational areas, diminishing property values and quality of life.

**Inadequate Visual Impact Analysis**

The DEIR fails to adequately assess visual impacts from surrounding residential properties and underestimates the industrial nature of the facility's appearance in this rural setting.

I11-11

**4. INCREASED WILDFIRE RISK AND PUBLIC SAFETY CONCERNS**

**Fire Risk from Battery Storage Systems**

The project includes 217.4 MW of lithium battery storage presenting significant fire risks:

- Battery thermal runaway can cause intense, difficult-to-extinguish fires
- Toxic gas emissions during battery fires pose health hazards
- Limited emergency response capability in rural Boulevard area

I11-12

**Inadequate Fire Protection**

Boulevard Fire Station 47 lacks resources for major industrial fires involving battery storage systems. The project's fire protection plan places unrealistic expectations on volunteer firefighters and rural fire departments.

**Fuel Load Concerns**

While the project claims fuel modification will reduce fire risk, the industrial infrastructure and electrical equipment create new ignition sources in a high fire-hazard area.

I11-13

**Increased Fire Risk from Vegetation Removal**

Contrary to the project's claims, clear-cutting 561 acres of natural chaparral will INCREASE fire risk by:

- Eliminating natural firebreaks created by diverse native plant communities
- Removing deep-rooted vegetation that maintains soil moisture and stability

I11-14

- Creating wind corridors that accelerate fire spread across cleared areas
- Destroying the natural patchwork of vegetation that slows fire progression
- Replacing fire-adapted native plants with non-native landscaping and structures that burn differently

The project falsely presents habitat destruction as "fuel modification" when mature chaparral actually provides natural fire protection through its evolved fire-resistance strategies.

I11-14  
(cont'd)

## 5. NOISE IMPACTS ON RURAL RESIDENTIAL COMMUNITY

### Industrial Noise in Quiet Rural Setting

The project will introduce continuous industrial noise from:

- Inverter cooling systems operating 24/7
- Battery storage system cooling equipment
- Tracking system motors throughout daylight hours
- Construction noise over 30 months total

### Baseline Noise Environment

Boulevard's rural setting currently has very low ambient noise levels. Any industrial noise represents a significant degradation of the peaceful rural environment residents chose.

### Inadequate Noise Analysis

The DEIR fails to adequately assess cumulative noise impacts from multiple inverters and cooling systems operating simultaneously across 588 acres.

I11-15

I11-16

## 6. CLIMATE JUSTICE CONCERNS

### False Solution to Climate Change

Large-scale solar projects in rural areas represent a false solution that allows urban areas to avoid reducing consumption while exporting environmental impacts to rural communities. True climate justice requires urban areas to reduce energy demand and implement distributed renewable energy.

### Perpetuating Environmental Inequity

The project perpetuates the same environmental inequities seen with fossil fuel infrastructure—concentrating industrial development and environmental burdens in rural, low-income communities while benefiting urban consumers.

I11-17

## 7. PROCEDURAL AND PLANNING CONCERNS

I11-18

**Inadequate Community Engagement**

The public participation process has been inadequate for meaningful community input. Rural residents lack resources to fully engage with complex technical documents and environmental reports.

I11-18  
(cont'd)

**Inconsistent with Rural Character**

The project fundamentally conflicts with the Rural Lands (RL-80) designation intended to preserve rural character and large lot residential development patterns.

I11-19

**Cumulative Impact Analysis Deficiencies**

The DEIR inadequately addresses cumulative impacts of multiple renewable energy projects transforming the Boulevard area into an industrial corridor.

I11-20

**Violation of CEQA's Environmental Justice Mandate**

This project fundamentally violates the spirit of CEQA by perpetuating environmental injustice. CEQA requires consideration of environmental justice impacts, yet this EIR fails to meaningfully address how concentrating industrial development in rural, low-income communities while benefiting urban consumers violates principles of equitable environmental protection. The law's intent is to prevent environmental harm, not simply document it while allowing disproportionate impacts on vulnerable communities.

I11-21

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**8. ECONOMIC JUSTICE ISSUES**

**Property Value Impacts**

The industrial development will significantly decrease surrounding property values, representing an uncompensated taking of residents' primary asset and retirement security.

**Insurance Cost Increases**

The concentration of multiple industrial energy facilities will fundamentally change the fire risk profile of Boulevard, likely resulting in increased homeowner's insurance premiums for all area residents—another uncompensated economic burden imposed on rural residents for urban benefit.

I11-22

**Burden Without Benefit**

Local residents bear all environmental costs while receiving no direct economic benefits. Construction jobs are temporary, and operational jobs are minimal.

**Utility-Scale Benefits Urban Areas**

The project's electricity will benefit urban San Diego consumers while rural residents suffer the environmental consequences—a classic environmental justice issue.

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## 9. ALTERNATIVES ANALYSIS DEFICIENCIES

### Insufficient Consideration of Distributed Solar

The DEIR fails to adequately analyze distributed solar alternatives that would avoid rural environmental impacts while providing the same renewable energy benefits.

I11-23

### No Analysis of Demand Reduction

The project assumes continued growth in energy demand without considering conservation and efficiency measures that could reduce the need for new generation.

I11-24

### Urban Solar Alternatives Dismissed

The DEIR inadequately considers urban brownfield sites, parking lots, and rooftop opportunities that could provide renewable energy without rural environmental destruction.

I11-25

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## 10. GROUNDWATER AND WATER RESOURCE IMPACTS

### Reduced Groundwater Recharge

The project will significantly impact local groundwater recharge through:

- Creation of 7 acres of impervious surfaces preventing natural infiltration
- Destruction of 561 acres of deep-rooted desert vegetation that facilitates groundwater recharge
- Altered surface hydrology redirecting natural infiltration patterns

I11-26

### Increased Water Demand on Limited Resources

The project will extract 67.9 acre-feet during construction and 0.81 acre-feet annually during operations from local groundwater sources. This additional demand burdens already stressed rural water systems serving a community of only 410 residents.

I11-27

### Threat to Rural Well Users

Many Boulevard residents rely on private wells. The combination of reduced recharge and increased extraction could lower groundwater levels, potentially impacting domestic wells that rural residents depend on for basic needs.

I11-28

### Environmental Justice in Water Access

Urban San Diego benefits from the renewable energy while rural residents face potential impacts to their basic water security—a fundamental environmental justice issue.

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## 11. MANDATORY CONDITIONS IF PROJECT IS APPROVED

While I strongly urge denial of this permit, if the Commission considers approval

I11-29

**despite these serious environmental justice concerns, the following conditions are essential to protect rural residents and natural resources:**

↑ I11-29  
(cont'd)

**Enhanced Visual Impact Mitigation**

- Reduce the footprint from 588 acres to reduce the visual impact
- Plant mature native oak trees (*Quercus agrifolia*, *Q. engelmannii*) as living visual barriers along all property boundaries visible from residences
- Construct earthen berms with native vegetation screening along perimeter fencing
- Install living walls of native desert plants to screen industrial equipment
- Require underground placement of all electrical infrastructure and equipment to eliminate visual intrusion including Tule Jim Lane
- Require 300ft setbacks from property lines and roads to limit the impact to the visual resources

I11-30

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I11-32

I11-33

**Comprehensive Biological Protection**

- Implement 3:1 habitat mitigation ratio (three acres of restoration for every acre disturbed)
- Require on-site habitat restoration within the same watershed and ecosystem
- Mandate salvage and successful transplantation of ALL native plants, not just special-status species
- Install wildlife crossing infrastructure to maintain habitat connectivity across the development

I11-34

I11-35

I11-36

I11-37

**Groundwater and Water Resource Protection**

- Install permanent groundwater monitoring wells on all adjacent properties with 25-year monitoring commitment
- Implement comprehensive rainwater harvesting and on-site infiltration systems to capture all stormwater
- Provide legally binding guarantees to restore or replace any impacted private wells
- Create enhanced aquifer recharge systems to offset groundwater extraction impacts

I11-38

I11-39

I11-40

I11-41

**Fire Safety and Emergency Preparedness**

- Construct on-site emergency response facility equipped for battery fire emergencies
- Install advanced fireproof barriers around all battery storage areas
- Implement state-of-the-art inert gas suppression systems for all electrical equipment
- Build redundant emergency access roads meeting fire department specifications

I11-42

I11-43

I11-44

**Noise and Air Quality Protection**

- Install sound barrier walls along all property boundaries near residential areas
- Mandate use of quietest available inverter and cooling system technology
- Establish permanent noise monitoring stations with real-time reporting to affected residents
- Install continuous air quality monitoring equipment throughout project operation

I  
I11-45  
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I11-46

**Community Protection and Benefit Requirements**

- Establish \$10 million Community Protection Fund to address property value impacts, infrastructure damage, emergency services enhancement, and ongoing environmental monitoring
- Reserve 25% of energy production for local residents at below-market rates
- Provide comprehensive road improvement and maintenance program for routes damaged by project traffic
- Fund independent environmental compliance monitor for entire project duration

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I11-47  
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I11-50

**Long-term Environmental Monitoring**

- Implement 25-year wildlife and habitat monitoring program with annual public reporting
- Conduct ongoing soil health and ecosystem monitoring across the entire site
- Maintain permanent archaeological monitoring during all construction phases
- Establish dark sky compliant lighting systems with full cutoff fixtures

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I11-51  
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I11-52  
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I11-53

**Coordination and Timing Requirements**

- Mandate phased construction schedule preventing simultaneous development of multiple regional projects
- Require binding regional traffic impact mitigation for all approved projects
- Establish maximum combined construction workforce limits for the Boulevard area
- Create joint environmental monitoring across all regional energy projects

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I11-54  
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I11-56  
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I11-57

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**CONCLUSION AND REQUESTED ACTION**

The Starlight Solar Project represents everything wrong with current approaches to renewable energy development—it perpetuates environmental injustice, destroys irreplaceable natural resources, and burdens vulnerable rural communities while allowing urban areas to avoid difficult choices about consumption and development patterns.

I  
I11-58  
↓

**I respectfully request that the San Diego County Planning Commission:**

1. **DENY the Major Use Permit** for the Starlight Solar Project
2. Direct county staff to develop policies prioritizing distributed renewable energy in urban areas
3. Establish environmental justice criteria for renewable energy projects
4. Require comprehensive cumulative impact analysis for rural renewable energy development
5. If approval is considered despite these concerns, mandate ALL of the protective conditions outlined above

True climate action requires climate justice. Destroying rural landscapes and burdening small communities is not an acceptable path to renewable energy. San Diego County must find better solutions that don't sacrifice environmental justice for renewable energy goals.

Thank you for your consideration of these critical concerns.

**Respectfully submitted,**

Weena Joshi

[wjoshi@health.ucsd.edu](mailto:wjoshi@health.ucsd.edu)

(805) 990-5924



**I11-58  
(cont'd)**

**From:** Matt Spencer <matt@sdcm.com>  
**To:** "Nicholas.Koutoufidis1@sdcounty.ca.gov"  
<Nicholas.Koutoufidis1@sdcounty.ca.gov>  
**Subject:** [External] Public Comment in OPPOSITION to Starlight Solar Project  
**Date:** Mon, 15 Sep 2025 16:15:34 +0000

Dear Nicholas Koutoufidis and Members of the San Diego County Planning Commission,

I am writing to request that the Major Use Permit for the Starlight Solar Project be DENIED. As a Boulevard property owner, I am deeply concerned about this 588-acre industrial facility that would destroy the natural resources and rural character of Boulevard, disproportionately burdening our small, rural community while failing to provide equitable climate solutions.

I12-1

Visual and Community Impacts: The DEIR acknowledges significant and unmitigated visual impacts. Over 235,000 solar panels, barbed-wire fencing, massive batteries, and 50-foot poles would permanently industrialize the desert landscape many chose to call home, degrading our property values, the rural character we bought our property for, and the scenic views that define our community.

I12-2

Ecological Destruction: The project would clear 561 acres of pristine chaparral that we Boulevard residents cherish, fragment wildlife corridors that define our landscape, and worsen local temperatures through the heat island effect. Off-site mitigation cannot replace the ecosystem functions, water recharge, and habitat connectivity that make our home special.

I12-3

Environmental Injustice: Boulevard, with only 410 residents, already hosts multiple energy projects and is becoming an industrial "sacrifice zone. We have no municipal government or resources to counter powerful developers, forcing us to absorb cumulative impacts of projects that primarily benefit urban consumers while we bear the costs.

I12-4

Public Safety: The 217 MW battery system presents fire risks that our

I12-5

rural firefighters cannot manage. Clear-cutting chaparral will increase, not reduce, fire danger in our neighborhood by removing natural firebreaks and soil-stabilizing vegetation that currently protect our homes.

↑ I12-5  
(cont'd)

Noise and Water Impacts: Continuous industrial noise will disrupt the quiet environment that drew us to Boulevard, while construction and soil compaction may lead to reduced recharge and threaten our private wells in a region where we already face water scarcity challenges.

I12-6  
I12-7

Misguided Climate Policy: Utility-scale solar in rural areas like ours shifts the burden to low-income communities while allowing urban areas to avoid conservation. Real climate justice requires distributed solar, efficiency, and urban siting of renewable energy - not sacrificing our community.

I12-8

Planning and Legal Concerns: The DEIR fails to adequately analyze cumulative impacts on our community, distributed alternatives, or consistency with CEQA's environmental justice mandate and our area's Rural Lands designation.

I12-9

The Starlight Solar Project would destroy the natural resources visitors and residents enjoy, endanger our public safety, and impose disproportionate costs on our vulnerable community while offering no local benefit to those who actually live in the community.

I12-10

I respectfully request that the Commission:

1. DENY the Major Use Permit.
2. Prioritize distributed, urban-based renewable energy.
3. Require true cumulative impact analysis and enforce environmental justice standards.
4. If approval is nonetheless considered, I request:

1. Residential well monitoring
2. 300 ft set back from roads and property lines
- 3.

I12-11  
I12-12  
▼ I12-13

Underground the overhead powerlines

4.

Construct earth barriers planted with native vegetation along the fence line

5.

Reduce the footprint of the project to reduce the visual impact.

6. Require the developer to compensate the community with clearly defined resilience benefits as a mandatory condition of approval.

True climate action requires climate justice. Sacrificing our rural Boulevard community for urban energy needs is not acceptable.

Respectfully,  
Matthew Spencer

I12-13  
(cont'd)

I12-14

I12-15

I12-16

I12-17

**Attached Images:**



**MATT SPENCER**  
OWNER & OPERATOR

619.857.2100 | MATT@SDCM.COM | SDCM.COM



**From:** Chantaia Soleil <chantih@gmail.com>  
**To:** Nicholas.Koutoufidis1@sdcounty.ca.gov,  
joel.anderson@sdcounty.ca.gov  
**Subject:** [External] Public Comment on Starlight Solar Project EIR —  
Request for Downsizing and Stronger Protections  
**Date:** Mon, 15 Sep 2025 15:38:50 -0700

Dear Mr. Koutoufidis and Supervisor Anderson,

I am a Boulevard resident whose property line borders the proposed Starlight Solar Project area. While I support renewable energy in principle, the current proposal—covering 588 acres with 235,500 panels, a 100 MW solar field, and a 217 MW battery storage facility—poses unacceptable risks to our community’s safety, environment, and rural character.

I  
I13-1

The County’s own EIR acknowledges “a permanent, significant, and unavoidable impact to Boulevard’s rural character and visual quality.” To responsibly pursue clean energy while safeguarding our community, I urge you to:

- \* Require 500 ft setbacks from all property lines and roads.
- \* Bury overhead power lines at Tule Jim Lane to reduce fire hazards and visual blight.
- \* Require native landscaping around panel clusters to protect wildlife corridors.
- \* Mandate independent well testing and monitoring to safeguard our aquifer.
- \* Address fire risks posed by large-scale batteries and panels, which increase ignition danger.
- \* Reduce the project’s size so that visual impacts, noise, and light pollution remain manageable.

I I13-2  
I I13-3  
I I13-4  
I I13-5  
I I13-6  
I I13-7

Left unchecked, this project could increase wildfire risk, threaten our aquifer and wells, destroy wildlife habitat, raise local temperatures by 2–8°F, and lower property values. Downsizing and adding robust protections will help balance renewable energy development with the long-term health and safety of Boulevard’s land, water, and residents.

I  
I13-8

Thank you for your attention and for holding this project accountable to the community it affects most.

I113-9

Sincerely,  
Chanti Holroyd  
Boulevard Resident

**From:** DAVID BERGGREN <davidberggren@cox.net>  
**To:** "Nicholas.Koutoufidis1@sdcounty.ca.gov"  
<nicholas.koutoufidis1@sdcounty.ca.gov>  
**Subject:** [External] Starlight Solar Project (PDS2022-MUP-22-010) DEIR - Public Comment  
**Date:** Mon, 15 Sep 2025 20:30:35 +0000

Dear Mr. Koutoufidis and the San Diego Planning Commission:

As Boulevard property owners, we oppose the Starlight Solar Project due to unacceptable environmental impacts, procedural deficiencies, and violations of environmental justice principles. The DEIR acknowledges significant unavoidable impacts while failing to protect affected residents or provide community benefits.

I14-1

Direct Property Impacts

Destroying our views and sacrificing the character of Boulevard  
Our property boundary sits 300 feet from proposed solar panels. The DEIR acknowledges unmitigated visual impacts that will destroy the rural character essential to our nature-based vacation rental business. This industrial infrastructure will significantly decrease our property value and threaten our livelihood, as guests seek the peace, remoteness, and unspoiled views that this project eliminates.

I14-2

Lowering our residential well recharge rates and contamination  
Our residential well was excluded from impact analysis, raising serious concerns about groundwater effects from extensive grading and soil compaction. We worry about the recharge rates of our well going down and possible contamination of our well water.

I14-3

Fire Safety and Insurance Risks

This project adds industrial infrastructure to a Very High Fire Hazard Severity Zone with limited evacuation routes. Increased fire risk

I14-4  
I14-5

threatens our ability to maintain property insurance, creating financial hardship in an already challenging rural insurance market.

↑ I14-5  
| (cont'd)

#### Environmental Justice Violations

Boulevard, Jacumba, and Campo have become dumping grounds for utility-scale renewable projects that benefit urban areas while burdening disadvantaged rural communities. This pattern violates the County's Climate Action Plan commitment to equitable distribution of renewable energy costs and benefits. Our community faces frequent power shutoffs yet receives no local energy benefits from these projects.

I14-6

#### Construction Impacts

The DEIR inadequately analyzes construction noise, pile driving, and potential blasting near residential properties. These impacts violate rural living standards and threaten resident health in a community that serves as refuge from urban disruption.

I14-7

#### Procedural Deficiencies

The County routinely approves energy projects through Statements of Overriding Considerations despite significant unavoidable impacts. This piecemeal approach fails CEQA requirements for cumulative impact analysis. A Programmatic EIR is needed to assess combined effects of all East County renewable projects. If multiple projects are under construction at the same time, it will be a disaster for environmentally and for the quality of life for residents.

I14-8

#### Required Actions

We request the County:

Deny the project and select the No Project alternative as

I14-9  
↓

environmentally superior.

▲ I14-9  
┆ (cont'd)

Provide written explanation of how concentrating renewable projects in disadvantaged East County communities complies with CEQA environmental justice requirements and County Climate Action Plan equity commitments.

┆ I14-10

Require Programmatic EIR to assess cumulative impacts of all utility-scale renewable projects in Boulevard, Campo, and Jacumba.

┆ I14-11

If approved, mandate binding conditions:

\* inclusion of private wells within 0.5 miles in groundwater monitoring;

┆ I14-12

\*

baseline and ongoing well monitoring;

\*

300-foot setbacks from property lines and roads;

┆ I14-13

\*

native landscaping around solar installations;

┆ I14-14

\* developer-funded residential solar systems or microgrid expansion for directly impacted residents.

┆ I14-15

Boulevard and surrounding communities are not appropriate energy sacrifice zones. If this project cannot be denied, affected residents deserve genuine protection, respect, and compensation beyond symbolic gestures. We urge the County to pursue renewable energy development in locations that don't burden disadvantaged communities or compromise critical environmental resources.

┆ I14-16

Respectfully,

David Berggren  
Property Owner – Boulevard, CA  
(619)993-1507

Two Property Addresses in Boulevard: Residence at 1594 Jewel Valley Rd, Boulevard, CA 91905, and 40 acres at 32.638832, -116.263905

**From:** Rebecca Berggren <itsmebeccalee@gmail.com>  
**To:** Nicholas.Koutoufidis1@sdcounty.ca.gov  
**Subject:** [External] Public Comment in OPPOSITION to Starlight Solar Project  
**Date:** Mon, 15 Sep 2025 09:13:52 -0700

Dear Nicholas Koutoufidis and San Diego County Planning & Development Services -

I am the owner of two separate properties in Boulevard, California, and am writing to submit this formal comment in opposition of the Starlight Solar Project (PDS2022-MUP-22-010) Draft Environmental Impact Report (DEIR).

I am strongly opposed to this project for the following reasons.

The project presents clear and documented Significant and Unavoidable Impacts, violates adopted County policies, threatens our water and safety, and offers no direct benefits to the very community being harmed. These impacts are in direct conflict with CEQA requirements, and we urge the County to deny this project or significantly revise it to include enforceable community protections and benefits.

I15-1

1. Visual and Scenic Resource Impacts

\*  
The DEIR acknowledges significant and unavoidable visual impacts.

\*  
Our north property line is just 300 feet from proposed solar panels in Area C. We and our guests regularly hike and explore that portion of the land.

\*  
The visual intrusion directly conflicts with the Boulevard Community Plan, Scenic Resource Policies, and our rights to rural preservation and quality of life.

I15-2

2.  
Environmental Justice & Equity Concerns

\*

San Diego County's Climate Action Plan (CAP) and the Regional Decarbonization Framework (RDF) affirm that renewable energy development must be conducted equitably with a commitment to not concentrating impacts in already burdened or disadvantaged communities, and to distribute both costs and benefits fairly across the county.

\*

The clustering of utility-scale renewable projects in East County's rural and disadvantaged areas - Jacumba, Boulevard, Campo - creates a pattern of environmental injustice. Our community has been repeatedly selected to host projects that urban centers benefit from, while we lose groundwater, viewsheds, rural character, and fire safety and see none of the promised returns.

\*

The Starlight Solar project is being sited in the rural backcountry of San Diego County, specifically in Boulevard, a community that has long been designated as disadvantaged in various California state tools, including the California Water Board's DAC mapping tool.

\*

These disadvantaged communities are small and don't have the resources to fight the developers.

\*

These areas are already overburdened by cumulative environmental and infrastructure impacts, including wind farms, solar installations, substations, and transmission lines.

I15-3

3.  
Well Recharge and Groundwater Risks

\*

Despite the project bordering one of our properties on the north AND west side, our residential well was not considered for impact analysis.

\*

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

I15-4

I15-5

4.  
Property Devaluation and Business Harm

\*

Our land and home are not speculative investments—they are our livelihoods.

\*

We have built a nature-focused vacation rental, and this project threatens the core business model of peace, remoteness, and unspoiled views.

\*

Solar infrastructure so close will make the property less desirable, lowering its resale and income-generating value.



I15-6

5.  
Wildfire Ignition Risk

\*

The project site is within a Very High Fire Hazard Severity Zone, and the addition of large-scale infrastructure increases ignition potential.

\*

Nearby residents like us will be at greater risk with limited evacuation routes and dry, windy conditions.

\*

Increased fire risk from this project may impact our ability to obtain or retain fire insurance for our property, which is already a growing challenge in rural San Diego County. This poses a serious financial and safety concern for us as property owners living in a high wildfire risk zone.



I15-7



I15-8

6.  
Energy Access and Resilience

\*

San Diego County has not ensured that rural communities benefit from the energy being extracted from their land.



I15-9

\*  
Boulevard residents face frequent 2–3 day PSPS outages, yet none of this 100 MW project will serve local homes.

I15-9  
(cont'd)

7.  
Construction Noise, Blasting, and Vibration

\*  
The DEIR fails to properly assess cumulative or peak-period construction noise.

I15-10

\*  
The use of pile driving and blasting so close to private homes is unacceptable.

I15-11

\*  
These impacts jeopardize resident health and violate rural noise thresholds.

I15-12

8.  
Pattern of Unchecked Project Approvals

\*  
Every energy project in Boulevard, Jacumba, and Campo has received an SOC (Statement of Overriding Considerations), including: Tule Wind, Rugged Solar, Tierra del Sol, JVR, Campo Wind, and more.

I15-13

\*  
These SOCs are issued despite documented Significant and Unavoidable Impacts.

\*  
The County must stop sacrificing the backcountry to meet vague regional mandates while offering us nothing in return.

9.  
Legal and Procedural Deficiencies

\*  
We support the Jacumba Community Sponsor Group's call for a Programmatic EIR to properly assess cumulative impacts.

I15-14

\*

There is clear legal precedent that the County is required to evaluate regional, interrelated energy development through a comprehensive CEQA analysis.

I15-14  
(cont'd)

REQUESTED ACTIONS:

We respectfully request that the County:

I15-15

1.

Reject the project entirely, or select the "No Project" alternative as the environmentally superior option.

2.

We demand a clear, written explanation of how the siting of this project along with the other utility-scale renewable projects in East County's rural and disadvantaged areas complies with the environmental justice requirements of CEQA, the County's Climate Action Plan, and State equity guidance.

I15-16

3.

A Programmatic EIR to properly assess cumulative impacts of all the utility-scale renewable projects in Boulevard, Campo and Jacumba.

I15-17

4.

If approval proceeds, we demand that the following be made binding conditions of approval:

I15-18

\*

Inclusion of private residential wells within at least 0.5 miles of the project in the GMMP.

\*

Baseline and ongoing monitoring of our wells for water level, recharge, and quality.

▲ I15-18  
┆ (cont'd)

\*  
300-foot setbacks from property lines and ALL public roads to protect privacy, safety, and community character.

┆  
I15-19

\*  
Add native landscaping around all solar panel clusters to mitigate some of the visual blight.

\*  
Require the developer to provide resilience benefits - including funding for residential solar + battery systems OR microgrid expansion - to directly impacted nearby residents as a condition of approval, ensuring at least some equitable benefit is realized locally.

┆  
I15-20

We urge Planning & Development Services and the Board of Supervisors to stop treating Boulevard and surrounding communities as an energy sacrifice zone. This project is incompatible with our community's goals, policies, and values. If it cannot be denied, then the people forced to live next to it must be respected, protected, and compensated with more than symbolic gestures.

┆  
I15-21

Sincerely,

Rebecca Berggren  
Property Owner – Boulevard, CA  
(619)838-4860  
itsmebeccalee@gmail.com <mailto:itsmebeccalee@gmail.com>

Two Property Addresses in Boulevard: Residence at 1594 Jewel Valley Rd, Boulevard, CA 91905, and 40 acres at 32.638832, -116.263905

**From:** Mara Harris <yogaexplorer@gmail.com>  
**To:** Nicholas.Koutoufidis1@sdcounty.ca.gov  
**Subject:** [External] Starlight Solar Project Proposed in Boulevard California 2025  
**Date:** Mon, 15 Sep 2025 16:28:47 -0700

Dear Nicholas Koutoufidis:

I am writing to formally oppose the proposed Starlight Solar Project, an industrial-scale facility planned for the Hagan Ranch property on Jewel Valley Road. While renewable energy is important, this project is not an appropriate or responsible development for our community.

The Starlight Solar Project would irreversibly transform 588 acres of rural Boulevard into an industrial power plant, with 235,500 solar panels—each up to 12 feet tall—and a massive 217.4 MW/MW battery storage facility. To operate, the developer seeks a Major Use Permit that would lock our community into decades of noise, dust, traffic, groundwater depletion, and heightened fire risk.

I am writing to express my deep concern regarding the proposed Starlight Solar Project by Empire Ranch, LLC, on behalf of SDG&E, at the Hagan Ranch site on Jewel Valley Road. While renewable energy is important for our future, the scale and location of this project pose significant risks to our community, environment, and way of life.

The proposed facility would cover 588 acres of rural land with 235,500 solar panels, each up to 12 feet tall, along with a 217.4 MW battery storage facility. To sustain operations, the developer is requesting a Major Use Permit that would allow this industrial project to operate for 30+ years, drawing heavily on our local resources—including 67.9 acre-feet of groundwater annually for dust control and grading.

This is not a community-based clean energy project. Instead, it will:

\* Destroy rural character: Replacing open landscapes with an industrial operation will permanently alter the identity of Boulevard.



I16-1



I16-2

\* Raise local temperatures by 2–8°F, creating heat island effects that harm residents, crops, and wildlife. I116-3

\* Increase wildfire danger, introducing flammable infrastructure and battery storage hazards in an already fire-prone region. I116-4

\* Strain limited water supplies, putting our community's essential resource at risk. I116-5

\* Cause years of dust, noise, and heavy truck traffic, degrading our air quality and daily lives. I116-6

\* Harm wildlife and natural habitats, displacing species that depend on open land. I116-7

\* Lower property values, while offering no tangible benefits such as lower electricity bills, local energy supply, or meaningful job creation. I116-8

This project, as proposed, provides no direct improvements to Boulevard or its residents. It serves corporate interests at the expense of the people, land, and resources of our community. We deserve thoughtful, balanced energy solutions that respect local needs, protect our environment, and support—not undermine—our rural quality of life. I116-9

For these reasons, I strongly oppose the approval of the Major Use Permit for the Starlight Solar Project in its current form. I respectfully urge you to reject this proposal and safeguard the land, water, and peace of Boulevard.

Mara Harris

Resident of Boulevard, California

Mara Harris  
- yoga explorer  
Women & Wellness Advocate  
Assemblage Artist - Assembling Found Objects and People  
Organic Intelligence Post-Trauma Growth Coach In Training  
direct  
619.723.0723  
\*\*\*\*\*

Blessings abound.

From: Dustin Valentine lovedustinvalentine@gmail.com  
To: Nicholas.Koutoufidis1@sdcounty.ca.gov, joel.anderson@sdcounty.ca.gov  
Subject: [External] Urgent Public Comment on Starlight Solar Project - Protect Our Land, Water, and Rural Character  
Date: Mon, 15 Sep 2025 19:09:24 -0700  
Dear Supervisors Koutoufidis and Anderson,

I am writing to you as a resident deeply concerned about the proposed **Starlight Solar Project** on the Hagan Ranch, a massive 588-acre industrial solar and battery facility.

I17-1

I respectfully submit that this project, in its current form, poses grave and irreversible threats to our land, our water, and the rural identity of Boulevard. As such, I urge you to address the following **critical demands** before any permit or approval moves forward:

**1. 300-Foot Setbacks from Roads & Property Lines**

We demand a minimum **300-foot setback** from all property lines and public roads. This buffer is essential to mitigate visual intrusion, reduce noise, noise-induced stress, glare, light pollution, and safety concerns. At present, the project leaves our homes and community dangerously exposed to industrial-scale infrastructure.

I17-2

**2. Bury the Overhead Power Line at Tule Jim Lane**

The proposed overhead gen-tie line across Tule Jim Lane is a glaring safety hazard and a visual blight. It must be **buried underground**. Overhead lines increase the risk of wildfire ignition, pose threats to transport and local traffic safety, and are simply incompatible with the rural landscape Boulevard residents cherish.

I17-3

**3. Require Native Landscaping Around Panel Clusters**

Large clusters of PV panels require thoughtful integration into the environment. I insist that they be surrounded by **native landscaping** to support soil health, wildlife habitat, pollinators, and to break up monocultural industrial appearance.

I17-4

**4. Independent Well Testing & Ongoing Monitoring**

This project proposes using **67.9 acre-feet** of groundwater for grading and dust control. The aquifer that feeds our wells is finite and precious. We need **independent, third-party well testing before, during, and after construction**, along with long-term monitoring and enforceable remediation if our water supply is harmed. Reliance on the developer's self-monitoring is inadequate.

I17-5

**5. Highlight Fire Risks from Large-Scale Batteries & Panels**

Installing a **217.4 MW battery energy storage system** together with hundreds of thousands of solar modules introduces a dramatically elevated fire and explosion risk. Large-scale batteries have a well-documented history of catastrophic thermal events. The Draft EIR acknowledges fire as a concern, but our community cannot bear the consequences of a single failure. The project must be scaled down, reconfigured for safer designs, or better yet relocated to more suitable industrial areas.

I17-6

**6. Visual Impacts Are Significant & Unavoidable — Project Must Be Reduced**

The EIR itself concludes that visual impacts are "significant and unavoidable." That is unacceptable. We cannot accept industrial sprawl erected in our backyard under claims of "minimized height" or "mitigation." This project must be **reduced in scale** — whether by limiting acreage, removing battery fields, increasing setbacks, or re-siting to areas better suited to industrial use.

I17-7

**In conclusion:** The Starlight Solar Project, as currently proposed, risks permanent damage to our rural character, quality of life, water security, and fire safety. Even with mitigations, many

I17-8

impacts remain unavoidable. With your leadership, we can insist on meaningful changes — or push for alternatives that truly respect Boulevard’s values and environment.  
Please, ensure these demands are incorporated in any approval process, or better yet, reject this plan in favor of more responsible, community-supported, distributed renewable solutions.  
Thank you for your attention and your service to our region.  
Sincerely,  
Dustin Valentine  
Resident of Boulevard, CA

↑  
**I17-8**  
(cont'd)

From: Melanie Zardeneta melaniezardeneta@gmail.com  
To: Nicholas.Koutoufidis1@sdcounty.ca.gov  
Subject: [External] Jewel valley road  
Date: Mon, 15 Sep 2025 23:43:08 -0700

Mr. Koutoufidis- I am not sure if this is the correct address to be submitting my concerns of the starlight project. If not I hope that you are able to direct it to the appropriate place.

I18-1

I have several concerns regarding the project that have to do with the environment. First and foremost, after speaking with a local resident( been here since 1975!) Who also owned property 3 miles from the larger but similar solar/ battery "project". They shared with me that they use to transport their cattle (200+) during the winter and spring time to calve. After the panels were installed they could no longer take the cattle there because they were no longer breeding successfully. Once brought back to our area they were successfully calving again. This is far beyond environmental. This is putting a halt in the existence of human beings. This is the livelihood of local people being involuntarily being stripped from the hands they have sacrificed for their families. They've struggled and worked like slaves to ensure their legacy to make certain their families were safe and productive contributing people.

I18-2

I am aware that this is not a concern of sdge or Mr. Häagen. Or Mr Whelan or yours for that matter. But it matters to people like them. The only reason they've been able to fight projects and developers and the county is because of their dedication and commitment to their ways of life.

Another concern of mine is the close proximity of this project in reference to my property. I have seen zero benefits to any of our community members. If you would try to be mindful of the facts that you are imposing on our reasons for living out here. Just as people pay to live oceanfront we pay to live in the rural natural undeveloped non commercialized region. We drive an hour either direction to grocery shop just to be able to look out our windows and not see traffic lights and people. Or hear the noise of construction or sirens or street lights. Our insurance costs are aiding in your plans to eradicate any people who might object to projects like these. Make the people a realistic offer that we can't turn down..make it worth the possible fire risk. Worth the eyesore. Worth the heat. Worth our cattle not being able to breed to sustain people that drive an hour to get ground beef.

I18-3

I would hope that your project would offer at least 300 feet of space between our new unnatural views. Offer property a water tank for water suppression. To give us a slight chance of fighting a fire when it does start. There is no water that would fight the type of fire that would be fightable from this project which would make it even more appealing or beneficial or worth anyone out here even considering this project

I18-4

I18-5

Im out of time and Want to make sure that this is submitted in time. Whoever I do have several other ideas can't concerns regarding The forward progress of this project. Please feel free to contact me At this email address or my cell phone 6 1 9 4 5 6 1 9 8 8. Thank you very much for reading this and considering my ideas and issues. I understand this is a big money making opportunity for everybody other than The people of our community who live here.

I18-6

Melanie Hayden