

May 26, 2026

Dear County Board of Supervisors,

I am writing to express my strong opposition to the County's cannabis program for Valley Center. I urge you to consider the following negative impacts associated with this initiative:

Water Issues

- **High Consumption:** Cannabis consumes approximately 6 gallons of water per plant, per day. This excessive use threatens local surface water and shallow aquifers, which are already strained.
- **Fire Risks:** We reside in a high fire risk area and need to preserve every drop of water. The hazardous wastewater generated from cannabis operations, due to THC extraction chemicals and pesticides, poses additional fire hazards. Many homeowners in Valley Center struggle to secure affordable fire insurance; introducing cannabis cultivation will only exacerbate this issue.
- **Impact on Organic Growers:** Valley Center is home to numerous organic growers who do not use pesticides or hazardous chemicals. We should prioritize their sustainable practices over cannabis cultivation that could pollute our soil.

Electricity Demand

- **Strain on Electric Grid:** The high electricity demand from cannabis operations could significantly strain our local electric grid.
- **Carbon Footprint:** The estimated CO2 emissions from cannabis cultivation are concerning, especially as California promotes electric vehicles to reduce carbon footprints. We should not be increasing our carbon emissions with cannabis production.

Air Quality

- **Pollution Concerns:** Cannabis grow sites emit Biogenic Volatile Organic Compounds (BVOCs), which produce strong odors. These compounds can lead to the formation of ground-level ozone and particulate matter, degrading local air quality.

Public Health Risks

- **Health Hazards:** Cannabis grow sites present significant public and occupational health risks, including hazardous air emissions, mold exposure, chemical contamination, and unsafe working conditions. These risks affect both workers and surrounding communities.
- **Reputation:** I believe the County Board of Supervisors would not want to be known for supporting initiatives that jeopardize public and occupational health.

In closing, I urge you to seriously consider the environmental, health, and social risks associated with cannabis grow sites in Valley Center.

Thank you for your attention to this important matter.

Sincerely,

Diane Strang



May 28, 2026

Board of Supervisors
County of San Diego
1600 Pacific Hwy
San Diego, CA 92101



Re: Accessory Dwelling Unit For Sale Proposal

Dear Honorable County Board of Supervisors,

On behalf of the Building Industry Association of San Diego (BIA), we respectfully request that the Board adopt State Law AB 1033 in full, without any additional local amendments. AB 1033 allows property owners to sell an Accessory Dwelling Unit (ADU) as a separate home—a proven strategy to expand homeownership opportunities.

The BIA is proud to represent the employers throughout the region that plan, design, and build the places that San Diegans live, work and play in. On behalf of hundreds of member businesses and a collective 20,000 jobs, we respectfully provide the following feedback with the goal of the best outcome for the County in enacting their ADU for sale policy and creating real homeownership opportunities region wide.

While AB 1033 is new to California, many other states have allowed the sale of ADUs for decades. Data shows that approximately 75% of ADUs are sold to meet a wide range of housing needs. ADUs, whether attached or detached, often become attainable “starter” units for first-time buyers, young families, and community members who would otherwise be priced out of homeownership and flung further away from jobs and support systems. Since homeownership is one of the most powerful drivers of long-term financial stability, policies that create more pathways into homeownership must be prioritized.

In many jurisdictions, ADUs are sold to family members, friends, or caregivers in ways that strengthen communities. For example, a grandmother may convert her garage into an ADU and sell the primary residence to her grandson and his growing family at a steep discount, creating a needed retirement ‘nest egg’ while keeping generations close. Others use ADUs to establish supportive neighborhoods where loved ones can age in place together.

Unfortunately, additional regulatory hurdles would unintentionally prevent these beneficial outcomes.

For example, if a grandmother wants to sell her ADU to her grandson at a discount, but the program requires a first right of refusal elsewhere, then the deal would be cancelled, and both grandson and grandmother lose that mutual opportunity. If that grandmother has an undesirable tenant dynamic and cannot manage renting her ADU anymore due to health concerns, she still could not sell the ADU because the policy would prioritize that renter. If the grandmother evicted the tenant and sold the ADU, she may face significant and complicated legal challenges.

To be clear- tenant protections exist for good reason. However, we urge this Board to think about this proposal in the broader context of the pre-existing policy landscape in which it would exist. The Legislature explicitly rejected similar restrictions when adopting AB 1033 because they undermine the very goals the bill was created to advance.

For these reasons, the BIA urges the Board to adopt AB 1033 as written. Doing so will support the creation of more attainable housing, foster intergenerational wealth-building, and encourage small-scale community networks where family and friends can thrive both financially and emotionally.

Thank you for your thoughtful leadership on housing solutions that expand opportunities for all residents.

Respectfully,

A handwritten signature in black ink, appearing to read "Aimee Faucett".

Aimee Faucett
President & CEO
Building Industry Association of San Diego

From: henkinp@earthlink.net
To: [BOS, District1Community](#); [MontgomerySteppe, Monica](#); [Lawson-Remer, Terra](#); [Supervisor Joel Anderson District 2](#); [Desmond, Jim](#)
Cc: [FGG, Public Comment](#); jmccann@chulavistaca.gov; mitch.mckay@imperialbeachca.gov; [Imperial Beach Eagle-Times](#); [Chula Vista Star News](#); [News Chula Vista Live Data](#); [News Chula Vista Today](#); [CV Live Data Robert Johnson](#); [San Diego UT Senior Editor](#); [San Diego UT Community Op Ed](#); [Times of San Diego](#); [Voice of San Diego](#); [City Council Carolina Chavez-D1](#); [City Council Jose Preciado-D2](#); [D3 City Council Michael Inzunza 2024-8](#); [City Council Cesar Fernandez-D4 2024-8](#); [Carol Seabury-D1 2022-](#); [Jack Fisher D2 2024-](#); [Matthew Leyba-Gonzalez D4](#); [Mariko Nakawatasse D3](#)
Subject: [External] "NEW" PIPE BREAK IN TJ RIVER VALLEY
Date: Sunday, May 31, 2026 7:13:14 PM

Hi Supervisors,

Can we help **right now**? Give advice? Local resources/help? Foster international co-operation and bypass all those competing agencies? Might be a golden opportunity!

CBS 8 News

Tijuana wastewater pipe collapses after emergency repairs earlier this month

Author: Katy Stegall, Published: 5:21 PM PDT May 30, 2026

SAN DIEGO — San Diego residents near the Tijuana River Channel can expect stronger odors in the area after a sewage line collapsed in Mexico late Friday night. This follows emergency repairs on the same pipe earlier this month.

The U.S. International Boundary and Water Commission said it's unclear why the collapse happened and is insisting Mexico make repairs immediately.

Mexico officials had to shut down several pumps that process wastewater along the border while repairs on the "Parallel Gravity Line" are underway.

"Area residents may notice increased wastewater flows in the Tijuana River Channel along with stronger odors," the agency said. "USIBWC is monitoring expected flows, sediment, and trash in the canyon collectors and is ready to respond as needed."

The agency also said the South Bay International Wastewater Treatment Plant is operating as normal.

From: [Kathleen Hayden](#)
To: [Supervisor Joel Anderson District 2](#); [Oakes, Chelsea](#); [Neal, Stephanie](#)
Cc: [FGG, Public Comment](#)
Subject: [External] Subject: URGENT: Direct Action Before Transition
Date: Tuesday, June 2, 2026 3:09:46 PM

Subject: URGENT: Direct Action Required to Secure Coyote Canyon Heritage Herd Protection & MSCP Compliance Before Transition

Dear Supervisor Anderson, Ms. Oakes, and Ms. Neal,

I am writing to formally present the conclusive evidence and legal rationale that mandates the inclusion of the **Coyote Canyon Heritage Herd** as a protected native cultural resource within the Multiple Species Conservation Program (MSCP) North County Plan revision.

This is a critical opportunity for the Board of Supervisors to secure the protection of an irreplaceable native resource and ensure the County’s land use planning meets its full compliance obligations before the impending transition to the County Treasurer-Tax Collector's Office.**I. The Mandate for Local Heritage Recognition and Compliance**

The current exclusion of this indigenous lineage is non-compliant with state law and creates unnecessary legal vulnerability for the County's environmental plans. Recognition is mandatory under several state requirements that supersede federal listing status:

- **CEQA Section 15380:** This permits the treatment of a species as rare or endangered when its survival is in jeopardy, *regardless* of its official listing status. ¹
- **California Policy 1755:** This obligates the state to maintain sufficient populations of **all wildlife species** and the habitat necessary to ensure their continued existence. ¹
- **Special Status Species Mandate:** County Resource Management Plans (RMPs) are required to evaluate the status of special status species using the **best available scientific and traditional ecological knowledge**, which includes formally recognizing this indigenous lineage. ^{1 2}

II. Countering Administrative Obstacles

We must address the administrative objections raised by County staff—specifically regarding non-native classification and the alleged non-viability of the land—with definitive evidence already in the County's possession:

Administrative Rationale to Decline	Conclusive Legal and Factual Rebuttal
Limited and Incontiguous Land: The County argues that the parcels are too small to support a viable population.	This concern is based on an incorrect management model. Wild horses naturally manage in small bands (8–12 animals) . The parcels identified in the MSCP and "Born of Horses" plans already provide for separate band management and breeding limitation , which is genetically viable for maintaining the lineage across the territory. ³

**Exclusion from
MSCP/Non-
Native**

Status: Staff cite the herd is not listed under CESA/FESA and is classified as "feral" or non-native.

This herd has been formally proposed by **Dr. Thomas King's SHPO nomination as a Traditional Cultural Property (TCP)**. The horses are recognized as "contributing elements" or "**character-defining features**" of the historic landscape, granting them legal protection under **CEQA and Section 106** of the National Historic Preservation Act. The **trail provisions** covering their habitat are also legally mandated **wildlife connectors**. 4 3 5

III. Requested Action

I request your intervention to direct staff to formally recognize the **Coyote Canyon Heritage Herd** as a protected native cultural resource in the North County Plan revision. This action will secure an irreplaceable native cultural resource and affirm the County's commitment to its mandatory compliance obligations.

Thank you for your service and for your decisive consideration of this critical resource management issue.

Sincerely,

Kathleen Hayden

Co-Founder and Manager, Coyote Canyon Caballos d'Anza non profit

POB 236

Santa Ysabel, CA 92070

(CC: PublicComment@sdcounty.ca.gov)

From: [Debinboulevard](#)
To: Nick.Koutoufidis@sdcounty.ca.gov; [Anderson, Joel](#); assemblymember.demaio@asm.ca.gov
Cc: [Smith, Ashley J](#)
Subject: [External] Urgent Opposition to Major Use Permit PDS2022-MUP-22-010 (Starlight Solar Project) – Catastrophic Public Safety and Environmental Risks of the Proposed BESS Facility
Date: Tuesday, June 2, 2026 7:50:19 PM

Honorable Members of the Board of Supervisors,

I am writing to you today as a dedicated resident and community advocate of the San Diego County backcountry to formally register my strenuous opposition to the massive battery energy storage system (BESS) component of the Starlight Solar Project, currently under review via Major Use Permit PDS2022-MUP-22-010.

To be entirely clear: I am not against green energy. However, I am completely opposed to a mega-utility project of this scale being placed in a high-risk, environmentally and ecologically vulnerable mountain and desert region that is fundamentally unsuited for this technology. The unique environmental stressors of our rural backcountry create an incredibly high probability of a catastrophic incident that our local infrastructure cannot survive.

Our specific concerns regarding this MUP application are grounded in the following technical and environmental realities:

Atmospheric and Elevation Stressors on Lithium Technology: This facility is proposed at an elevation of nearly 4,000 feet. At this altitude, changes in air density force lithium batteries to swell and retract, placing severe mechanical stress on the cells. Furthermore, our microclimate experiences extreme temperature fluctuations—frequently dropping rapidly from 100°F to 40°F in a single evening—compounded by unpredictable atmospheric rivers. Lithium-ion technology is not engineered to maintain stability under these rapid, violent thermal and atmospheric shifts.

Extreme High Winds and Predictability: Our region experiences extreme high winds that change direction and speed unexpectedly. Because of the complex topography, there is not a meteorologist on the planet who can accurately predict the immediate wind behavior here. In the event of a thermal runaway, predicting or containing the path of destruction is a statistical impossibility.

Toxic Plume and Water Source Contamination: A lithium fire of this magnitude is virtually unquenchable and capable of releasing a deadly, toxic chemical plume containing hydrogen fluoride. Because the wind shifts rapidly, this plume would put multiple surrounding areas at immediate risk. The fallout would cause devastating health issues, kill livestock and pets, and poison our soil. Most critically, it risks permanently contaminating our groundwater—which is our community's only water source.

Consistent Failure of Internal Safety Systems: Real-world data shows that the internal alert and suppression systems within these massive BESS facilities consistently fail during a thermal runaway event because the extreme heat destroys the monitoring mechanisms during the initial failure sequence. We cannot rely on the developers' promises of "smart" automated safety.

Total Absence of Adequate Emergency Resources: Boulevard and its surrounding backcountry lack the emergency infrastructure required to handle a massive chemical fire, let alone a highly toxic evacuation scenario. No local or county emergency management office is equipped to mitigate a catastrophic environmental incident of this scale in our terrain.

Placing an 858 MWh volatile chemical footprint in a high-wind, high-elevation desert environment is an unacceptable gamble with human lives, animals, and our permanent water supply. As our elected county representatives, we expect the Board of Supervisors to prioritize the fundamental safety of the backcountry and deny this permit request.

I urge you to protect our rural community, review the severe technical risks associated with

this site, and reject PDS2022-MUP-22-010.

I welcome the opportunity to discuss these critical safety concerns with you further.

Sincerely,

Deborah Gonzales

Optimist Club of San Diego County Back Country - President

Registered Voter, District 2 / Boulevard Community Advocate Volunteer

Chase Cook

Registered Voter, District 2 / Backcountry Resident

Zachary McLee

Registered voter District 2/

Back Country Resident

From: [Kathleen Hayden](#)
To: pgriffin@blm.gov; jbortola@blm.gov; zsiegert@blm.gov; BLM_HQ_260_WHB-PEA@blm.gov
Cc: Polanco_Julianne@Parks; Brown_Jody_L@Parks; [FGG, Public Comment](#)
Subject: [External] Formal Public Comment – National (PEA) for Wild Horse and Burro Gathers
Date: Thursday, June 4, 2026 10:10:58 AM

June 4, 2026

VIA EMAIL AND U.S. MAIL BLM_HQ_260_WHB-PEA@blm.gov Bill Parks, WHB Information Specialist BLM Oklahoma Field Office 201 Stephenson Parkway, Suite 1200 Norman, OK 73072

RE: Formal Public Comment – National Programmatic Environmental Assessment (PEA) for Wild Horse and Burro Gathers

Dear Mr. Parks and Bureau of Land Management Representatives:

I submit this formal public comment regarding the proposed National Programmatic Environmental Assessment (PEA) for Wild Horse and Burro Gathers on behalf of Coyote Canyon Caballos d’Anza and the Coyote Canyon Wild Horse MSCP Repatriation Project.

As a researcher and advocate specializing in historic landscapes, the National Historic Preservation Act (NHPA), and the protection of wild horses as native cultural and historic resources, I assert that the proposed PEA is legally, scientifically, and structurally deficient. The Bureau of Land Management’s (BLM) current paradigm of relying on artificially constrained Herd Management Areas (HMAs) and biologically unsound Appropriate Management Levels (AMLs) fails to meet modern statutory mandates.

The BLM cannot legally finalize a programmatic document intended to expedite removals without addressing the following systemic failures in its Resource Management Plans (RMPs):

1. Failure to Comply with Section 106 of the NHPA

The foundational implementation of the 1971 Wild Free-Roaming Horses and Burros Act (WFRHBA) failed to trigger and comply with Section 106 of the NHPA. The WFRHBA explicitly designates wild horses as "living symbols of the historic and pioneer spirit of the West." Therefore, the geographic areas they occupy are, by definition, historic landscapes. The federal government’s failure to conduct Section 106 reviews to evaluate these Traditional Cultural Properties before drawing arbitrary Herd Area boundaries means that any modern RMP or PEA relying on those boundaries is built on a legally deficient foundation. Until wild horses are included in RMPs as protected native, cultural, and historic resources, the underlying RMPs—and any PEA tiering from them—remain fatally flawed.

2. Ignoring the 1973 ESA Paradigm Shift

While the 1971 Act protected the animals themselves, the passage of the Endangered Species Act in 1973 fundamentally changed the legal standard for wildlife management across all federal agencies. The scientific and legal reality, later affirmed by *Babbitt v. Sweet Home*, is that you cannot protect a species without protecting its habitat. The continuous reduction of wild horse forage and water allocations in favor of commercial interests constitutes actionable harm. The BLM's management of wild horses has failed to evolve with this statutory shift,

stubbornly applying a lens of removal and containment rather than habitat preservation.

3. Codified Authority for Rewilding 640 Million Acres

The argument that wild horses are strictly confined to their 1971 borders ignores the sweeping federal authority clarified by the Supreme Court in *Kleppe v. New Mexico* (1976) and codified under the Federal Land Policy and Management Act (FLPMA). Congress exercises complete power over public lands under the Property Clause, including the protection of wild horses as an integral part of the natural system. FLPMA provides the explicit statutory mechanism to amend RMPs to utilize the 640 million acres of federal public lands to accommodate excess animals. No gathers should be approved without a substantial analysis of alternative wildlife habitats available by operation of law.

4. Redefining "Excess" to Mandate Genetic Continuity

The BLM's current method for determining "excess" populations is biologically unsound. Establishing an AML without prioritizing minimum viable population limits guarantees the systemic inbreeding and genetic collapse of wild herds. "Excess" cannot be legally or scientifically declared until baseline numbers guarantee long-term genetic continuity. Removals that drop populations below genetically viable thresholds violate the mandate to manage these animals sustainably.

Conclusion and Demand

The BLM cannot arbitrarily "zero out" herds or ignore its mandate to manage the land for multiple uses, which explicitly includes wild horses (*West Douglas findings*; *US v. Hughes*). A national PEA cannot substitute for the site-specific, data-driven analysis required by the BLM's own handbook before determining excess or authorizing removals.

I demand that the BLM halt the progression of this PEA until RMPs are comprehensively overhauled to include wild horses as protected historic resources, ensure genetic continuity in all population modeling, and actively allocate portions of federal public lands for the rewilding of excess animals.

Sincerely,

Kathleen Hayden Co-Founder and Manager, Coyote Canyon Caballos d'Anza **non profit**

PO Box 236, Santa Ysabel, CA 92070

From: [knick offman](#)
Subject: [External] Lakeside is in national news
Date: Saturday, June 6, 2026 4:30:23 PM

It's no secret that East San Diego has the highest concentration of Arab persons, in the state. Muslims, "asylum seekers", you name it.

It was only a matter of time.

<https://www.nbcsandiego.com/news/local/lakeside-man-two-others-accused-of-plotting-to-support-isis/4033355/>

<https://www.justice.gov/opa/pr/three-arrested-kansas-and-california-charged-plot-support-isis>

<https://www.cbsnews.com/sacramento/news/california-kansas-isis-plot-fbi-arrests-3/>

City policy brought us to this point. Untold numbers of muslims imported. You should hear about how they treat american women, in El Cajon here.

All the phony "asylum seekers" need to go home. Policy needs to be fixed
Or you could quit office.
Or we could recall you

From: [Brooke Patton](#)
To: [FGG, Public Comment](#)
Subject: [External] Support for Starlight Solar Project – PDS2022-MUP-22-010; LOG NO. PDS2022-ER-22-21-002
Date: Friday, June 5, 2026 10:12:52 AM
Attachments: [image001.png](#)
[Support for the Starlight Solar Project - SD Board of Supervisors.pdf](#)

Good morning:

Please see the attached letter from Chris Hannan, President of the State Building and Construction Trades Council, in support of the Starlight Solar Project (PDS2022-MUP-22-010; LOG NO. PDS2022-ER-22-21-002).

Thank you.

Best,

Brooke Patton
Communications Director
Cell: 916-996-6972



State Building and Construction Trades Council of California

CHRIS HANNAN
PRESIDENT

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

J. TOM BACA
SECRETARY-TREASURER

June 3, 2026

San Diego County Board of Supervisors
County Administration Center
1600 Pacific Highway, Room 335
San Diego, CA 92101

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

Dear Chair Lawson-Remer and Supervisors:

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

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

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

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

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

June 3, 2026

Page 2

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

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "C. Hannan", with a long horizontal flourish extending to the right.

CHRIS HANNAN
President

CH:mh
opeiu#29/afl-cio

From: [Murphy Smith](#)
To: [FGG, Public Comment](#)
Subject: [External] Opposition Comment to Starlight Solar Agenda Item 4
Date: Monday, June 8, 2026 3:03:14 PM

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

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

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

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

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

One might think that this is insignificant but that could not be farther from the truth. Given that one of the most significant pre-existing noise sources at the

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

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

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

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

The Rugged Solar project, another project proposed for Boulevard, states in their 2015 EIR that they anticipated using the Bauer RG21T as well, and gave noise levels of 85-90dBA at 50 feet away.

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

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

And a collection of more general, less solar-specific, published pile-driver noise levels from authoritative sources :

Freeway and Highway Administration FHWA: 85-101 dBa
Steel Piling Solutions: 85-95 dBa
US Army Corps of Engineers: 101 dB at 45 feet
Pile Driving Contractors Association: 85-115 dBa

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

In addition to my time researching and performing comparative EIR analysis, I also did my own noise measurement of a pile-driver in operation. This took place on March 18, 2026 outside of the JVR Energy Park. I used a Digi-Sense 20250-29 meter, professionally calibrated by InnoCal. This meter conforms to the same ANSI IEC61672-1 Class 2 standard as the equipment used in the Starlight Solar noise study. Without trespassing on the property or having knowledge of the construction schedule, I had to keep at a distance which I approximate was at least 150 feet away and perhaps even a bit further. However, even at this distance, when the pile-driver was in operation the meter was recording levels of 69dBa. Using the standard accepted equation of 6dB loss per doubling of distance, this means that at

the ranges discussed in the EIR (33 to 50 feet), the levels would roughly be at least somewhere in the 80-90 dB range or even higher. This agrees with the levels given by all the other sources outside of Starlight Solar.

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

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

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

Finally, I would like to give one last reference, this time to The CEQA Memorandum of Understanding which states "CEQA REQUIRES that state and local agencies disclose and evaluate the significant environmental impacts of proposed projects and adopt **all feasible mitigation measures**"

It is with this in mind that I believe the county should strongly consider all of the feedback coming from this community in terms of alternatives, modifications, community benefits and mitigation measures, which in my opinion should include required noise barriers, a better noise study, further setbacks from property boundaries, and mandatory independent regulatory oversight.

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

With trust and understanding,
Murf

From: [John Ricker](#)
To: mayortoddgloria@sandiego.gov; [BOS, District1Community](#); [FGG, Public Comment](#); Zeldin.Lee@epa.gov; PAO@ibwc.gov; mariaelena.giner@ibwc.gov
Subject: [External] Request for Immediate Action Regarding the South Bay Ocean Outfall and Ongoing Sewage Impacts to Imperial Beach and Coronado
Date: Tuesday, June 9, 2026 11:50:57 PM

Dear Officials,

I am writing to urge immediate action on the ongoing sewage crisis affecting Imperial Beach and Coronado. The redirection of sewage through the South Bay Ocean Outfall continues to impact water quality, public health, and our communities.

Please take action to address this critical issue.

With help from C4CC,
JDR

From: [Cijey DelaRosa](#)
To: mayortoddgloria@sandiego.gov; [BOS, District1Community](#); [FGG, Public Comment](#); Zeldin.Lee@epa.gov; PAO@ibwc.gov; mariaelena.giner@ibwc.gov
Subject: [External] Request for Immediate Action Regarding the South Bay Ocean Outfall and Ongoing Sewage Impacts to Imperial Beach and Coronado
Date: Tuesday, June 9, 2026 6:15:58 PM

Dear Officials,

I am writing to urge immediate action on the ongoing sewage crisis affecting Imperial Beach, Coronado, and the rest of San Diego beaches. The redirection of sewage through the South Bay Ocean Outfall continues to impact water quality, public health, and our communities.

Last summer I got an ear infection every time I went in the water. I recently learned how to swim, snorkel & got scuba PADI certified. I would love the opportunity to share ocean discoveries of my city with the rest of the world. I implore you help save my city's beach health & tourism before it's too late.

San Diego is beautiful, but at the moment I am ashamed that my government hasn't sourced scientists & environmental engineering to fix poop water.

I have some ideas. Biodigesters for Mexico. Water filtering boats/ boat accessories, afflicte program for those who assist. House boats with filtering. Bio-engineered filter island.

Please take action to address this critical issue.

Thank you,
God bless you,

Cijey De La Rosa

From: [Jason Dworman](#)
To: [FGG, Public Comment](#)
Subject: [External] problems in SD County- SHAME on YOU!!!
Date: Wednesday, June 10, 2026 11:20:44 AM
Attachments: [Outlook-xbdqhuxe.png](#)
[Outlook-4exemdzc.png](#)
Importance: High

I moved to California in 1978 and then down to San Diego in 1979. There's no other place on earth that compares. Yet you and those so-called leaders in Suckramento feel it is okay to squeeze us to support your frivolous programs on our dime!!! Why don't you look at cutting back on your spending instead of asking us all of the time for us to cut back.

The California governments, local and state OWE us transparency where every penny is being spent. Look first at your Sanctuary Shitty policy. It is an insult to all of us, they way we get treated because you are just looking for reasons to spend!!! Where is the oversight!!!

Why do you think it is OKAY to add on 1000's of jobs when we are in a crisis. Governments are NOT supposed to be wasting our hard earned tax dollars!!! YET all I can see is greed and graft!!! Kind of like a Macy's Family and Friends sale, except for there's no limit!!!

Thank you, Jason

Jason Dworman-Nursery Sales

858-722-3326 ph/text

ISA Arborist Certification ID: WE-9558A-Retired

jasontrees@outlook.com



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