Late Public Correspondence
Item 3

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MISSION:
To accelerate clean technology innovation and promote the equitable deployment of sustainable solutions across the San Diego region for the benefit of the economy, the environment, and all members of the community.

July 5, 2021

San Diego County Planning Commission
c/o County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123

RE: Support for the Jacumba Valley Ranch Energy Park – Agenda Item 3, JVR Solar; PDS2018-MUP-20-008

Dear Chairman Edwards and Members:

On behalf of Cleantech San Diego, please accept this letter of support for BayWa r.e.'s Jacumba Valley Ranch Energy Park project (JVR). As a local renewable energy source, JVR is a critical piece of San Diego Community Power's renewable energy portfolio and an essential part of helping the region meet its economic and environmental goals.

Cleantech San Diego is a business organization that positions the greater San Diego region as a global leader in the cleantech economy. Our members include more than 120 local businesses, universities, governments, and nonprofits committed to advancing sustainable solutions for the benefit of the economy, the environment, and all members of the community.

Once completed, JVR will also generate enough clean energy to power tens of thousands of homes. In addition, the project will create 350 quality jobs for San Diego County residents during its construction.

As a responsible renewable energy developer, BayWa r.e. has done its utmost to ensure the site is designed to protect the area's wildlife habitat and to reduce visual impacts for residents and tourists. In addition to providing substantial buffers from the town and Old Highway 80 as well as screening with landscaping, BayWa r.e. has also committed to making improvements for the Jacumba Community Park, and other investments that will help improve the quality of life for those who live in, work in, and visit Jacumba.

I urge you to support this important project and continue to support the development of local renewable energy projects in the San Diego region for the benefit of our economy and environment.

Sincerely,

Jason Anderson
President and CEO
Cleantech San Diego

Solar Industry Research Data

Solar Industry Growing at a Record Pace

Nationwide, the solar industry is thriving, driving record growth in Wisconsin's economy. Data from Wisconsin and the Solar Foundation, SEIA tracks trends and experiences in the solar industry that demonstrate the diverse and sustained growth of solar across the country.

Below you will find charts and information summarizing the state of solar in the U.S. If you're looking for more data, explore our research page. In addition, SEIA Members have access to presentation slide decks that contain this data and much more. Not a SEIA Member? Join today!

Massive Growth Since 2000 Sets the Stage for the Solar+ Decade

In the last two decades alone, solar has experienced an average annual growth rate of 42%. Thanks to strong federal policies like the solar Investment Tax Credit, rapidly declining costs, and increasing demand across the private and public sector for clean electricity, there are now more than 150 gigawatts (GW) of solar capacity installed nationwide, enough to power 34.6 million homes.

Cumulative U.S. Solar Installations

Source: SEIA/Wood Mackenzie Solar Market Insight Report

Solar as an Economic Engine

As of 2020, more than 250,000 Americans work in solar, at more than 10,000 companies in every U.S. state. In 2019, the solar industry generated more than $25 billion of private investment in the American economy.

U.S. Solar Workers by Job Category

Source: National Solar Jobs Census 2020

Growth in Solar is Led by Falling Prices

The cost of solar has dropped by more than 70% in the last decade, leading the industry to expand into new markets and to compete without incentives in increasingly sunny states. As of Q4 2020 one of their lowest quarters, utilities offered wholesale rates, on average (and residential rates has dropped from a pre-incentive price of $40,000 in 2010 to roughly $20,000 today, while recent utility-scale prices range from $16/MWh - $35/MWh, competitive with all other forms of generation.

U.S. Solar PV Price Declines & Deployment Growth

Source: SEIA/Wood Mackenzie Solar Market Insight Report

Solar's Share of New Capacity has Grown Rapidly

Solar accounted first or second in new electric capacity additions in each of the last 6 years. In 2016, 69% of all new electric capacity added to the grid came from solar, the largest such share in history and the second year in a row that solar added the most generating capacity to the grid. Solar's increasing competitiveness against other technologies has allowed it to quickly increase its share of total U.S. electrical generation - from just 0.1% in 2010 to over 3% today.

U.S. Annual Additions of New Electric Generating Capacity

Source: SEIA/Wood Mackenzie Solar Market Insight Report

The U.S Solar Industry is a 50-State Market

While California has traditionally dominated the U.S. solar market, other markets are emerging in regard capacity. In 2016, entire swaths of California made up their largest share of the market in the last decade, led by rapid growth in Florida and Texas. As the price of solar continues to fall, new state markets will grow.

Cumulative U.S. Solar Installations by State

Source: SEIA/Wood Mackenzie Solar Market Insight Report

Prices Decline for Rooftop Solar, but Higher Soft Costs Remain

The biggest cost-driven opportunity in residential and small-commercial solar remains soft costs, which includes installation labor, customer acquisition, and permitting, inspection and interconnection (PII). Soft costs per installation have fallen substantially in recent months due to increased customer demand, rising hardware costs and pandemic-related improvements to permitting practices. U.S. solar soft costs continue to be much higher than those of other developed solar markets around the world. Through programs like Solar Automated Permit Processing (SolarAPP) and Solarmap, SEIA and our partners are working to reduce local barriers to going solar.

Residential Solar PV System Pricing

Source: SEIA/Wood Mackenzie Solar Market Insight Report

Storage is Increasingly Paired with All Forms of Solar

Homeowners and businesses are increasingly demonstrating solar systems that are paired with battery storage. While this pairing is still relatively rare, the growth over the next five years is expected to be significant. By 2021, nearly 25% of all behind-the-meter solar systems will be paired with storage, compared to under 9% in 2020. The utility-scale market is also recognizing the benefits of pairing solar with storage. In 2020, 3 GW of utility-scale solar projects included storage, representing over a quarter of all contracted projects.

Percentage of Distributed Solar Systems Paired with Energy Storage

Source: SEIA/Wood Mackenzie Power & Storage Market Data 2020 Data Update

Residential Market Continues to Diversify

Following a mature MTL the residential solar market survived off 2018 with an impressive Q1, before slowing due to pandemic-related slowdowns in Q2. The residential market has been growing steadily since 2010 as more and more companies transitioned to online sales models and demand increased. The 5.1 GW installed in 2020 represent another annual record, with large sales pipelines looking well for 2021.

Annual Residential Solar PV Installations

Source: SEIA/Wood Mackenzie Power & Storage Market Data 2020 Data Update

Corporate Clean Energy Goals Boost Commercial Solar

The commercial solar market, which consists of on-site solar installations for businesses, schools, and non-profits, has been growing steadily since 2010 as the industry continues to stack the financing tools needed to provide access to a wide variety of business types. However, sustained adoption by large companies with clean energy goals like Walmart, Apple, Target and Amazon will help push the segment to near-record levels in 2021. With less than 1% of commercial electricity demand served by on-site solar, there remains significant opportunity for growth in this segment.

Commercial Solar PV Installations & Penetration Growth

Source: SEIA/Wood Mackenzie Power & Storage Market Data 2020 Data Update

New State Entrants Help Fuel Community Solar Growth

While solar growth for community solar installations was led primarily by three key markets - New York, Minnesota, and Massachusetts - a growing list of states with community solar programs have helped diversify the market, setting the stage for a record year in 2021. Continued growth in state community solar programs is imperative to ensure solar access for all types of homeowners and businesses.

Cumulative U.S. Community Solar Installations

Source: SEIA/Wood Mackenzie Power & Storage Market Data 2020 Data Update

Large Utility-Scale Solar Pipeline Outpaces Installs

Despite sustained years of uncertainty due to the imposition of solar module tariffs, declines in tariff rates combined with growing clean energy goals from states, large companies and utilities have led to massive increases in utility-scale solar procurement. As of Q2 2021, the commercial pipeline sits at 77 GW, with most of those projects slated for completion before 2024, ahead of the previously scheduled expiration of the Investment Tax Credit (ITC) and the tariffs on solar cells and modules in December 2020. While most developing utility-scale projects have remained on schedule despite the pandemic, increasing global prices for many inputs and the tightening of tax equity markets have the potential to create delays for some projects in the near-term.

Utility PV Installations vs. Contracted Pipeline

Source: SEIA/Wood Mackenzie Power & Storage Market Data 2020 Data Update

Solar PV Growth Forecast

Despite setbacks posed by the pandemic, the U.S. solar market set a new annual record in 2020 with 19.2 GW installed. The industry is now poised for growth, recovering demand in the residential and non-residential segments, the industry is on for a series of record years until 2024, when the ITC is scheduled to fully step down. Barring new policy developments at the state and federal levels, industry growth through the end of the decade is premised on continued price declines and increasing demand from corporate, utility, and community solar customers. Over the next 10 years, 214 GW will be installed, 3 times the amount installed through 2020.

U.S. Solar PV Deployment Forecast

Source: SEIA/Wood Mackenzie Power & Storage Market Data 2020 Data Update

More Aggressive Growth Needed to Reach Climate Goals

Before proposed grants over the next 10 years puts the solar market in reach of ambitious clean energy goals set by the industry and the Biden administration, solar must continue to grow at a record pace. Under the Biden Plan for a clean electricity system, annual installs will need to grow from less than 20 GW in 2020 to more than 60 GW by 2030, with cumulative totals nearing 600 GW by the end of the decade. A combination of private sector innovation and stable, long-term policy will set the solar industry on a path to achieving these more aggressive goals to address climate change and decarbonize the economy.

Business-as-Usual Growth Compared with 100% Clean Energy by 2035

Solar Helps Fortune 500 Companies Save Money

Solar is a sustained Clean Energy Business Growth engine that creates 1 GW of corporations, including Apple, Amazon, Walmart, Target, and Google are investing in solar and renewable energy at an incredible rate. Through 2019, the top corporate solar users in America have installed more than 8.300 MW of capacity across more than 36,000 different facilities across the country.

Solar Key takeaways:

- Corporate solar adoption has expected rapidly over the past several years, with two thirds of all capacity installed since 2015.
- The 1,200 MW installed in 2020 represents a 19% increase from 2018 and is second to only 2017 for annual commercial deployment.
- The surge in on-site commercial solar continued in 2019, with a record 842 MW installed, while 441 MW of off-site projects were completed.
- Solar installations by Fortune 500 companies generate enough electricity each year to power 1 million U.S. homes.

Installed Solar Capacity by Company

You can explore SEIA's Solar Stories Business reports, including interactive maps and data tools on the top corporate solar users in the U.S.

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July 8, 2021

VIA EMAIL

Chair Edwards and Planning Commissioners
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123
Ann.Jimenez@sdcounty.ca.gov/

Re: JVR Energy Park (Log No. PDS2018-MUP-18-022) SCH No. 2019039044

Dear Chair Edwards and Commissioners:

On behalf of our client, We Are Human Kind, LLC (Human Kind), owner of the historic Jacumba Hot Springs Resort, we respectfully request that you recommend approval of the Jacumba Sponsor Group's Equity Balance Plan (Equity Alternative) as an alternative that would meet all of the basic objectives of the JVR Energy Project (Project) while reducing the otherwise significant and unmitigated acknowledged impacts to the community of Jacumba and all those who travel along I-8 and Old Highway 80 in the Mountain Empire subregion. In addition, we ask that you recommend denial of certification of the FEIR as currently drafted given serious issues that exist and are discussed below.

First, it's important to note that we believe that renewable energy and the community can co-exist, if the renewable energy projects are appropriately sited, and buffered. Renewable energy such as solar is a necessary resource for our region and, indeed, the world. That is not at issue. The question is, how can the County permit solar farms in a way that provides the energy sources needed without destroying a long-standing rural community that is also a vital constituent of this County. Unfortunately, the Community Buffer Alternative does not adequately address the significant aesthetic impacts the community that would result from allowing the land bordering Old Highway 80 to be converted to sea of solar panels, steel battery containers and unsightly infrastructure that is currently proposed under both the project and, to a lesser but still too large extent, the Community Buffer alternative.

It is all too easy to site renewable energy projects in Jacumba Hot Springs because it is near the Sunrise Power Link, has significant open space and abundant sun, and a small population. But the easiest solution is not the best, at least not in this situation.

While there is a place for this project– even in this same location, simply scaled back enough to provide a sufficient buffer that can allow the project to co-exist with the community in a way that lessens the otherwise significant impacts and continues to feasibly meet the basic project objectives. Although Bay Wa has falsely stated that it has community support, that is not the case. Rather than focusing on mitigation or alternatives that could accomplish most if not all of its objectives while respecting the history and culture and viability of its surroundings, it assumes the fact it wants the highest tax credits and is offering renewable energy allows it to downplay and ignore the significant impacts to the community and the project's inconsistencies with the County's General Plan and its Mountain Empire Subregional Plan (Subregional Plan). Although other County renewable energy projects have undergone General Plan amendments to address inconsistencies that otherwise would exist and the Notice of Preparation for this project said it would go through a similar process, that process has been short-circuited and the project before the Planning Commission this Friday is one that is not consistent with the General Plan or the Subregional Plan or, as currently proposed, the County's Zoning Ordinance.

Bay Wa's response to the community's desire to maintain a reasonable quality of life by setting the solar arrays further from the town's entrance along Old Highway 80, resulted in an increase to the setback by a mere 52 feet on the north and 122 feet on the south – that wouldn't even make it to the 50-yard line of any football field. Bay Wa's revised project does little to lessen the significant unmitigated impacts on the community.

Aesthetics

There are a number of policies in the General Plan and Subregional Plan – including that portion of the Subregional Plan that includes the Jacumba Hot Springs Vision Statement – with which the project does not comply, and as a result the FEIR's conclusion that the project would have a less than significant impact related to compliance with applicable goals, policies or requirements of an applicable County Community Plan, Subregional Plan or Historic District's zoning is incorrect. The conclusions in Table 2.1-1 are unsupportable and there is, in fact, a significant impact due to the project's inconsistent with the Subregional Plan (including the Jacumba Vision Statement)'s goals.

The Subregional Plan has a goal of establishing a network of scenic highway corridors within which scenic, historical and recreational resources are not only protected but enhanced, and Old Highway 80 is one of the named scenic highway corridors that is subject to that goal. In addition, the FEIR recognizes that "Old Highway 80, which parallels the Project site for approximately 1 mile, is also included in the County Scenic Highway System (County of San Diego 2011a)." FEIR at 2.1-8, and "Old Highway 80 is a designated California State Historic Route. In 2006, the state legislature granted this designation in recognition of the highway's 'outstanding natural, cultural, historic and scenic qualities.'" FEIR at 2.1-13.

The FEIR recognizes that the project would have significant impacts on for those traveling down Old Highway 80 or who live near it. And yet, despite this, the FEIR somehow concludes that the project is consistent with the policy of protecting and enhancing the very corridor it concedes it impacts because "there are no current local regulations governing development of lands along I-8 or Old Highway 80." The Subregional Plan does not state

that it is only when the listed corridors are governed by some local regulations that the goal applies. And the other renewable projects that arguably also impact views in this general area are irrelevant. For one thing, those projects were much smaller than the project proposed here. In addition, the FEIR identified that this project site provided opportunities for long and broad scenic views from I-8 and from Old Highway 80, which was not the case for the Jacumba Solar project. Finally, the FEIR justifies its conclusion that having a significant visual impact on views along a scenic highway corridor that has been designated as such by the State is nonetheless consistent with a Scenic Highways Goal of protecting and enhancing those same highways by arguing that the County could still establish and designate Old Highway 80 as a scenic highway, even though the views which make it scenic would be gone. (See FEIR at Table 2.1-1 on page 2.1-73). That is twisted logic. No, it's unlikely once the reason for designating a highway as scenic is gone and the view if not of a rural desert environment but a sea of solar panels and energy infrastructure the County would at that point provide a local designation as a scenic highway but, more importantly, this whole discussion ignores the fact that the Subregional Plan goal is to protect and enhance the scenic highway and specifically I-8 and Old Highway 80 in this area, and the Project is, instead, replacing the scenic vista with solar panels and steel. The FEIR errs in finding the project consistent with the Scenic Highways Goal of the Subregional Plan – it is a significant, unmitigated impact as logic and a common sense reading of the policy against the FEIR's description of the view impacts makes clear.

The FEIR fails to discuss other portions of the Subregional Plan, including: "additional industrial development is not compatible with the goal of maintaining the rural character in the Subregion," Subregional Plan at 12, and on page 14, where the Subregional Plan discusses the project site: "The Ketchum Ranch Specific Plan proposes a multi-use concept, a residential community with recreational and visitor oriented commercial uses on approximately 1,300 acres next to Jacumba. The Ketchum Ranch Specific Plan proposal shall create *a community in harmony with the existing town of Jacumba* and provide services to the existing residents of Jacumba. *It will also be sensitive in its design to the natural and historical resources of the Jacumba area*. Adequate provisions shall be made to prevent periodic flooding originating at the Mexican border." Subregional Plan at 14 (emphasis added). Despite the fact the project is being built on this exact site, the FEIR ignores the direction in the Subregional Plan that development on that site be in harmony with the surrounding town and sensitive in its design to both the natural and historic resources of the area. The project is inconsistent with this policy and yet that inconsistency is not discussed.

The FEIR at 2.1-16 and 17 left out three of the paragraphs of the Vision Statement for Jacumba, which include the statements "We want …[services] and still not lose the wonderful feeling that is Jacumba. Clean air, beautiful scenery …. We hope someday to become the jewel of the backcountry." Subregional Plan (Jacumba) at 1 (emphasis added). The project is inconsistent with this Vision. It interferes with the area's "beautiful scenery", and it converts more than 600 acres of rural land into a sea of solar panels and associated utility equipment, which no one would consider the path towards is creating a backcountry "jewel." The FEIR omits Jacumba's vision statement from its analysis and from Table 2.1-1, treating it as if it is not a part of the Subregional Plan and therefore can be ignored because the County has not prepared a separate, standalone, community plan for Jacumba Hot Springs. That is not the case. Jacumba Hot Springs is a part of the Subregional Plan, and the project is

inconsistent with the community's vision of retaining its beautiful scenery and becoming the jewel of the backcountry. That impact is significant, and the inconsistencies of the project with the community's vision should have been disclosed.

Land Use

The Project Does Not Comply with the County's Zoning Ordinance.

The FEIR's conclusion that as a Major Impact Utility it may go anywhere it well pleases is tortured at best. The County's zoning ordinance Section 1350 states that utilities which have substantial impact "***may*** be conditionally permitted in any zone" but only "when the 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." County Zoning Ordinance Section 1350. Simply proposing a solar farm does not by itself satisfy the code's requirements. Rather, the Zoning Ordinance requires that before a project can transcend the limits typically placed on zoning, there must be a showing that the project site is the "necessary location" and has "community wide interest." Neither of those requirements is met here.

The project site is not the "necessary" location, while it is one possible location, there are others equally appropriate and with fewer impacts. As for the community-wide interest" requirement, 98% of the community opposes to project and does not find it in the community's interest. Should the project developer argue that in this case "community wide" really should be read to mean "county-side," the County was perfectly able to put the word "county" in place of "community" but did not.

In addition, the County's Zoning Code goes on to list the zones in which Major Impact Utilities are allowed, and the zoning of the property which would include the majority of the project is zoned Specific Plan Area (S88+). Specific Plan Area (S88+) is one of the very few zones which does not allow Major Impact Utilities, according to Section 2885 of the Zoning Ordinance and the accompanying Use & Enclosure Matrix. Major impact utilities are not among the uses expressly listed as being permitted by the S88 Use Regulations, and Zoning Ordinance's Use & Enclosure Matrix, which graphically portrays and specifically lists the use types allowed in each zone, similarly does not allow Major Impact Utilities in the S88+ zone. Major Impact Services and Utilities are permitted in virtually every other County zone. Major Impact Utilities are expressly allowed in: i) every residential zone, ii) every commercial zone except C42* Visitor Serving Commercial, iii) every industrial zone, iv) every Agricultural zone and v) six of the nine Special Purpose Zones. Major Impact Utilities are expressly not allowed in: i) S81 Ecological Resource Area, ii) land zoned S86 Parking, and iii) land zoned S88+ Specific Plan Area. *See* County Zoning Ordinance Use & Enclosure Matrix. The Use & Enclosure Matrix's graphic representation and the language of the Zoning Ordinance match – and neither allow Major Impact Utilities on S88+ zoned land.

The FEIR attempts to sidestep this problem by relying on "Special Provisions and Limitations: S88 Use Regulations," which arguably contradicts Section 2885 and allows a Major Use Permit to be granted on S88+ zoned land, but only if it meets one of two specific conditions. The project does not.

To qualify under Section 2888, a Major Impact Utility must have a Major Use Permit and must either remove all structures and improvements in a specified timeline or enter into a bonded agreement "…in an amount sufficient to ensure the removal of all buildings, structures, and other improvements within a specified time and/or under specified conditions when the decision-making body finds that such agreement will carry out the intent of this Ordinance and is enforceable by the County." *See* County Zoning Ordinance Section 2888.

While the project is entering into a bonded agreement to remove parts of the overall project, it is not removing the Switchyard Facilities, which are permanent. As a result, it does not and cannot meet the requirements of Section 2888. The FEIR states that the project can get around this requirement because the Switchyard Facilities, even though they are operating under the Major Use Permit granted to the project, could theoretically be permitted under a Minor Use Permit under Section 2884, which allows Minor Impact Facilities with a Minor Use Permit. Except it's unclear if the Switchyard Facilities would qualify as a Minor Impact Utility under a Minor Use Permit, but it's impossible to know given that the applicant did not apply for such a permit. Instead, the Switchyard Facilities are part of the same project Major Use Permit, and the Switchyard Facilities will not be removed and therefore do not qualify under Section 2888. The project applicant argues that is acceptable because after construction the Switchyard Facilities will be transferred to SDG&E" and no longer subject to the County's jurisdiction, FEIR 3.1.4-24, as if that solves the problem.

But it does not. The Switchyard Facility fails to meet both prongs of the requirements of Section 2888 – it will not be removed, and the County will not have jurisdiction to enforce its zoning ordinance against the Switchyard Facilities after they are built. Allowing a Major Impact Utility on property zoned S88 when S88 is one of the very few zones in which Major Impact Utilities are not expressly allowed does not "carry out the intent" of the Zoning Ordinance -- it contradicts it. This project does not fully meet the requirements of Zoning Code Section 1350, Section 2884, Section 2885, or Section 2888. The appropriate solution would be to rezone the property, as should have been done at the beginning, into a zone that does allow the project, including the Switchyard Facilities.

<u>The Project is Not Consistent with The County General Plan</u>

According to the County CEQA Guidelines, a significant land use impact would result if:

The proposed project directly conflicts with applicable land use plans, policies, or regulations of an agency with jurisdiction over the project (e.g., General Plan; Community or Subregional Plans; and the Zoning Ordinance), <u>adopted for the purpose of avoiding or mitigating an environmental effect</u>.

<u>The EIR acknowledges two General Plan policies apply to the project, which were specifically adopted for the purpose of avoiding or mitigating impacts to scenic resources in the County:</u>

- Policy COS-11.1: Protection of Scenic Resources. Require the protection of scenic highways, corridors, regionally significant scenic vistas, and natural features, including prominent ridgelines, dominant landforms, reservoirs, and scenic landscapes.

- Policy COS-11.3: Development Siting and Design. Require development within visually sensitive areas to minimize visual impacts and to preserve unique or special visual features, particularly in rural areas, through the following:

  - Creative site planning
  - Integration of natural features into the project
  - Appropriate scale, materials, and design to complement the surrounding natural landscape
  - Minimal disturbance of topography
  - Clustering of development so as to preserve a balance of open space vistas, natural features and community character
  - Creation of contiguous open space networks

Yet the project will be visible from both I-8 and Old Highway 80, which are both identified on Figure C-5 (Scenic Highways) of the General Plan Conservation and Open Space Element as part of the County Scenic Highway System. The project is inconsistent with the above-cited policies but could be modified to be consistent by increasing the buffers as presented in the Jacumba community's Equity Balance plan.

<u>The Subregional Plan policy also applies to the project</u>:

- Scenic Highways Goal. Establish a network of scenic highway corridors within which scenic, historical and recreational resources are protected and enhanced (specifically including Old Highway 80).

As part of that Subregional Plan, the Vision Statement for Jacumba also states:

- The community supports new development that is compatible with, and preserves the natural and historical environment, including water resources, and protects existing neighborhoods, manages growth to reinforce the rural small-town character of the area.

Despite demonstrating that the project would have significant and unavoidable aesthetics impacts, the FEIR concludes under Land Use that it "would be consistent …. with policies of the adopted San Diego County General Plan." In fact, FEIR goes on to say that "because the area has not been designated by local, state or federal agencies or organizations as containing or being of "significant" scenic value, the Project would not conflict with this policy." The word "significant" is emphasized in the land use consistency discussion in Table 3.1.4-4, which also states that the Project has been designed to minimize impacts to the scenic value of the area, to the extent practicable.

The FEIR also states that "implementation and operation of the Proposed Project would not prevent the County from continuing to establish and designate scenic highways and would not inhibit the County from

establishing regulations and/or development standards geared towards the protection and enhancement of scenic highways." Given the significant and unavoidable impacts to aesthetics, those conclusions are clearly wrong. The FEIR should be revised to conclude that the project will have a significant land use policy impact as well.

Policy COS-11:3 nowhere states that it is designed only for officially designated scenic highways; instead, the policy requires all development within visually sensitive areas – which this one is – to minimize visual impacts and preserve special visual features "particularly in rural areas …." The FEIR's analysis ignores the rural setting of this beautiful property and the project's transformation of a rural area into an industrial utility scale solar farm with its towers and acres and acres of black panels. If the project were set back from Old Highway 80 as the Jacumba Hot Springs Equity Balance Plan proposes, it may be able to satisfy this policy.

This project conflicts with the County's General Plan policies COS-11.1 and COS-11.3, and, as been recognized with previous solar projects, therefore is required to do a General Plan Amendment. The creative way the project attempts to avoid its legal requirement to do a General Plan Amendment is to call the project an "interim" use. It is not an interim use. The FEIR concedes that the Switchyard Facilities are a permanent use. The project at a minimum would be in use a minimum of 38 years – a generation. Given that the Switchyard Facilities will remain in place, and the solar industry is continuing to extend the life of solar components, it is much more likely than not that solar will remain in place here permanently if it is allowed to be installed. Even if one ignores the permanence of the Switchyard Facilities and the 38 year-minimum life of the remainder, the law does not allow the County to approve a project that is inconsistent with the General Plan, and the attempt to avoid that conclusion by stamping an "interim" label on a 38-year-long inconsistent is not allowed.

The County is treating this solar project inconsistently with others. For example, the County required the removal of trackers from the area likely to be visible to trackers along I-8 in order to find consistency with General Plan policy COS-11.1 and COS-11.3 (cited above). *See* Rugged Solar Farm FEIR at 2.5-42.

For the LanEast Solar Farm, the County's FEIR noted that "due to the proximity of the solar farm site to I-8, development of the site with solar facilities would conflict with County General Plan policies COS-11.1 (protection of scenic resources) and COS-11.3 (development siting and design). These policies require the protection of scenic highways, corridors, and scenic landscapes (COS-11.1) and the minimization of visual impacts particularly in rural areas (COS-11.3), and therefore, aesthetics impacts associated with the LanEast project would be inconsistent with these policies (see Section 2.1, Aesthetics). Accordingly, the LanEast solar farm would conflict with County General Plan policies, and a potentially significant impact (LU-LE-1) would result. As indicated in Table 1-11, Approvals/Permits Expected to be Obtained, LanEast would require a General Plan Amendment." *See* LanEast Solar Farm FEIR at 2.5-45.

In addition, the County required the LanWest Solar Farm to obtain a General Plan Amendment, because of its proximity to I-8, saying: "The LanWest solar farm would be generally consistent with County General Plan policies. However, due to the proximity of the solar farm site to I-8, development of the site with solar facilities would

conflict with County General Plan policies COS-11.1 (protection of scenic resources) and COS-11.3 (development siting and design). These policies require the protection of scenic highways, corridors, and scenic landscapes (COS-11.1) and the minimization of visual impacts particularly in rural areas (COS-11.3), and therefore, aesthetics impacts associated with the LanWest project would be inconsistent with these policies (see Section 2.1, Aesthetics). **Accordingly, the LanWest solar farm would conflict with County General Plan policies, and a potentially significant impact (LU-LW-1) would result. As indicated in Table 1-11, Approvals/Permits Expected to be Obtained, LanWest would require a General Plan Amendment. Compliance with the County General Plan and other applicable land use plans and policies is a prerequisite for project approval**." *See* LanWest Solar Farm FEIR at 2.5-47.

In contrast, the JV energy project has made no attempt to conform with County policies on scenic policy, despite that being required of other solar projects. A simple comparison of Figures 2.1-7 and 2.1-8A in the FEIR shows that the most visible part of the site is where the solar arrays has been sited, while the less visible portions are avoided. The project's solution to these unmitigated impacts is to provide a 15-foot-wide landscape strip around the perimeter that parallels a chain-link fence with brown slats located within a setback from a County scenic highway. The revised project modifies the development footprint along Old Highway 80 by 3% and at the same time increases the power production above levels described in the DEIR. No attempt has been made to site the solar arrays in the less visible areas of the project site, similar to what was required of the Rugged solar farm. There are feasible mitigation measures and alternatives available that would offset the project's impacts to scenic resources, as required by County Scenic Highway System policies, that have not been discussed and should be adopted, including by adoption of the Jacumba Equity Balance plan alternative.

Not only does the revised project not minimize its impacts to scenic resources and visual character for the community of Jacumba to the extent feasible, but there is also no rationale provided in the FEIR as to why an arbitrary 300-foot buffer would actually lessen the impacts to the County-designated scenic corridor along Old Highway 80.

The Land Use and Planning section of the FEIR concludes that the project is consistent with Policy COS-11-1 and COS-11.3 (both of which were adopted by the County for the purpose of avoiding or mitigating an impact to scenic resources) on the basis that the scenery is not significant enough; in contrast, the Aesthetics/Visual Quality section concludes the project's impacts to scenic landscapes would be significant and unmitigable. This internal inconsistency is just one more example of why the FEIR's conclusions of consistency is flawed.

As a result, the FEIR, as written, is deficient in terms of the defensibility of the land use policy analysis for scenic corridors and should be recirculated. Moreover, the project should process a GPA in order to gain an "exception from the scenic policies" similar to other solar farm projects processed by the County. The Major Use Permit Findings cannot be made where, as here, there are General Plan land use policy conflicts, especially given that they result in significant and unavoidable environmental impacts.

In fact, a clear and direct conflict with a mandatory provision of an applicable plan amounts to an inconsistency that precludes project approval. *See* Families Unafraid v. County of El Dorado (1998) 62 Cal. App. 4th 1332, 1341 (project must satisfy mandatory general plan policy that is fundamental and unambiguous and does not allow discretion in interpretation and application). The project's inconsistency must be cured before the project can be approved; a county cannot approve a project that is inconsistent with its general plan. Moreover, the inconsistency is evidence that the inconsistent project feature will result in a significant environmental effect on aesthetics and community character.

As discussed in Aesthetics, above, the project is also inconsistent with the Subregional Plan, including the Jacumba Vision Statement. The FEIR states that "[s]ince Jacumba Hot Springs does not have an adopted community plan and the Jacumba Vision Statement and Background does not contain goals or policies, only the applicable subregional plan (i.e., Mountain Empire Subregional Plan) is assessed in Table 2.1-1." FEIR at 2.1-47. By doing so, the FEIR ignores the Jacumba Vision Statement that itself is a goal and one that is most impacted by this project. The goal of the Jacumba portion of the Subregional Plan includes not losing "the wonderful feeling that is Jacumba. Clean air, beautiful scenery, superb climate, and no congestion or traffic." Subregional Plan (Jacumba) at 1. The FEIR fails to analyze the fact that the project would conflict with and is inconsistent with that vision, because the project would destroy the "beautiful scenery" that is a primary part of the vision for the community.

The Subregional Plan's Conservation Element Environmental Resources Goal Policies and Recommendation that "The Jacumba Hotel should be restored, if at all possible," Subregional Plan at 23, is also ignored in the analysis of consistency with applicable plans and policies. The ability to restore and have a thriving Jacumba Hotel is seriously impeded by the project's refusal to accommodate reasonable requests for sufficient setback to avoid the significant and unmitigated impacts the project would cause to the community and the Jacumba Hotel.

As discussed above, the project is also inconsistent with the Subregional Plan's goal of protecting and enhancing the Old Highway 80 scenic highway corridor. The FEIR concedes that the solar facility would be visible from both I-8 and Old Highway 80, and the "current electrical infrastructure visible is only the transmission lines, which are some distance away. To assert that the project is nonetheless consistent with this goal simply because there are no current local regulations governing development of lands along I-8 or Old Highway 80 and that there is other energy infrastructure visible from I-8 and Old Highway 80 is unsupportable. Creating a significant visual and aesthetic impact on I-8 and Old Highway 80 is in no way protecting or enhancing a scenic view as the goal requires. The fact that in other sections of those highways there may be other energy projects does not create consistency for this project. Here, both I-8 and Old Highway 80 were identified as providing opportunities for long and/or broad scenic views, and the FEIR noted that landscaping and slatted or screened fencing would only partially screen solar panels and project components from view of passing motorists, and yet found no inconsistency with a policy of preserving and enhancing the scenic view. That does not pass the reasonable person test, or the laugh test, or meet CEQA's requirements. The conclusion is made no better by the argument that degrading the view does not prevent the County from nonetheless establishing guidelines to avoid making it even

worse. That is not the issue here. The evidence shows that JVR Energy Park Project would be inconsistent with the Scenic Highways Goal of the Subregional Plan.

Similarly, the conclusion that the Switchyard Facilities are consistent with the County General Plan and the Subregional Plan is incorrect. Like the solar panels, battery story containers, inverters and platforms and other utility-related infrastructure proposed as part of the project, the Switchyard Facilities are not in keeping with the rural desert environment that now exists and conflict with the same goals and policies as the rest of the project. Moreover, the Switchyard Facilities are permanent, as is their impact on the community, and the permanent location of the Switchyard Facilities make it even more likely solar farm will stay in this location long after the 38-year lifetime given in the FEIR, making the inconsistencies with the Subregional Plan, including the ability of Jacumba to achieve its Vision, permanent.

The significant unmitigated impacts to aesthetics that are acknowledged in the FEIR are evidence that no reasonable person would conclude that the project is nonetheless somehow consistent with the policies of the Subregional Plan and its Jacumba Vision Statement.

The FEIR's conclusion that the project is consistent with County General Plan Policy LU-1.9, which recognizes that projects should achieve the densities shown on the applicable Land Use Map, is also in error. Replacing the homes and other development planned for this property for at least the next 38 years with acres of solar panels and associated infrastructure, including permanent Switchyard Facilities, is counter to this policy. Meeting this land use policy has become ever more important as San Diego County's housing crisis has grown, and there is significant density planned for this site that definitely will not and cannot be developed for at least 38 more years – at least one generation. Moreover, there is little evidence to support a conclusion that anything close to the planned densities will ever be achieved on this site if this project is allowed to move forward either as proposed or as described in the Community Buffer Alternative. The applicant concedes that the Switchyard Facilities will remain in place even if the solar farm is decommissioned, and in addition to the footprint consumed by the Switchyard Facilities, the mere fact of having such a structure on the property will constrain future development of the planned Specific Plan. It is a fantasy to believe that the solar farm, once installed, would actually ever go away. The estimated life of the newer solar equipment is being extended all the time and, even if ultimately the proposed equipment needs to be replaced, it is more logical to conclude it will be replaced with updated solar farm equipment and not removed and replaced by a mixed-use community some 38+ years from now. It's more likely that the remainder of what is now the community of Jacumba Hot Springs will instead have been replaced, as few people who seek the character of San Diego's backcountry want to live instead next to a utility scale solar farm.

The FEIR acknowledges that "due to the wide distribution of solar panels within the 643 623-acre solar facility, the Proposed Project would substantially reduce the quality of existing views toward the solar facility from I-8 (Impact AE-3), Old Highway 80 (Impact AE-4), Jacumba Community Park (Impact AE-5), Anza- Borrego Desert State

Park (Impact AE-6), Round Mountain (Impact AE-7), Airport Mesa (Impact AE-8), and Table Mountain and the nearby mesa to the south (Impact AE-9)." FEIR at 2.1-70. The conclusion that there is no conflict with the Subregional Plan's goals of protecting Jacumba's natural assets and desert environment, that would not detract from the subregion's rural charm and that would protect and enhance the I-8 and Old Highway 80 roadways in this location is unsupportable. These acknowledged impacts are inconsistent with those goals and policies and visions, and that inconsistency and the impact that results must be acknowledged. There is no basis for the FEIR's conclusion on 2.1-71 that the project would have less than significant impacts related to compliance with applicable goals, policies or requirements of an applicable County Community Plan, Subregional Plan, or Historic District's zoning and in fact the preceding page shows that in fact that is not the case. The impacts are significant, and the project is inconsistent with those policies and thus with the County General Plan.

Air Quality

Valley Fever

The FEIR's discussion of Valley Fever downplays the risks from this infectious disease. Human infection results from inhalation of spores that have become airborne when dry, dusty soil or dirt is disturbed, such as by wind or construction. Even though about 60% of people infected are asymptomatic and do not seek medical attention, that does not mean there is no impact, just that the infection often goes untreated. According to the California Department of Public Health, reported suspect, probable, and confirmed cases of Valley Fever have steadily risen in recent years throughout California. Among the factors that may indicate a project's potential to create Valley Fever impacts are disturbance of the topsoil of undeveloped land (to a depth of about 12 inches; undisturbed, non-urban areas; windy areas; and out-of-town construction workers exposed to the area.

The project will disturb topsoil, in a non-urban area that has not been disturbed for some time and will expose people from out of the area to the soil who come for construction. Moreover, Santa Ana winds are common. Not only does the construction risk exposing workers to the fever, but the disturbance of soil also could spread fugitive dust containing the spores to the nearby residences and businesses. The FEIR's conclusion that "Valley Fever is not considered highly endemic to San Diego," FEIR at 2.2-8, is hardly comforting, especially given that cases have steadily been on the rise. Nor does the FEIR's conclusion that, "[e]ven if present at a site, earth-moving activities may not result in increased incidence of Valley Fever," FEIR at 2.2-8, because the propagation of the spores depends on climatic conditions and exposure is highest after early season rains and long dry spells. The climatic conditions at the site are hot and dry and certainly within the type of conditions in which the spores thrive, and the dry spells are often long in the area. Nor is it comforting that "receptors must be exposed to and inhale the spores" – it is the construction workers disturbing the soil and the residents and workers and visitors to Jacumba in the vicinity of the project site that are breathing in the dust from the site that would be inhaling the spores. Nor does the fact that not every single person who is exposed to the spores are guaranteed to become ill. It is a potential impact to the health of the workers and the community that has been underplayed in the FEIR.

The range of Valley Fever complications based on information from the Valley Fever Center for Excellence are from 50-60% with no complications to 40-50% with acute pneumonia, 5% with Chronic Progressive Pneumonia, 5-10% with Pulmonary Nodules and Cavities and 1-5% Disseminated. *See* Valley Fever Center for Excellence, 2019.

Air Impacts Across and From the Border with Mexico

The U.S./Mexico Border does not somehow stop impacts from air emissions. The geographic extent of the analysis of cumulative impacts related to air quality is artificially limited in the FEIR to the U.S./Mexico border. FEIR at 2.2-34. Air emissions do not know to stop at an invisible line drawn on a map, and the emissions from this project will travel into Mexico, and the air quality in the area is impacted by emissions from projects located in Mexico that emit pollutants that similarly travel to this site. Due to the artificial limit of cumulative projects only to those on the U.S. side of the border, the cumulative analysis is inadequate.

Biological Resources

The property that Bay Wa proposes to convert to a mega solar farm teems with a variety of habitat and wildlife and serving as an important wildlife corridor for a variety of animals. Among those animals, we learn for the first time in the FEIR, are cougars. The FEIR states on page 2.3-30, in newly added language, that within some unspecified portion of the Project Area "…there are suitable rocky outcrops, irregular terrain, and good connectivity to large open spaces in adjacent areas that may serve as suitable habitat for this species." Although the FEIR states that the cougar habitat is unlikely to be in the development footprint, there is insufficient evidence supporting that conclusion. The FEIR states that cougars may traverse the project site, and yet concludes that removing the cougar's and impeding its corridors by adding more than 600 acres of solar panels to what now is open terrain would not impact the cougar because the animal conveniently prefers areas of the project that the applicant does not plan to use. While it is possible that the cougars may more often use areas outside of the development footprint, the conclusion that adding the development to its habitat will have no impact on the cougars in the area is not adequately supported. The FEIR did not conduct a focused wildlife corridor study (FEIR at 2.3-79) and instead bases its conclusion on general knowledge of the area, probably key wildlife species (without including the cougar until the FEIR) and typical movement patterns. FEIR at 2.3-79.

Impact B1-WLC-2 notes there would be permanent direct impacts on habitat connectivity and wildlife corridors, but the FEIR states that the project would not create any "unnatural" movement corridors despite creating a dead-end for wildlife traveling west to east along the northern portion of the project site and funneling the wildlife toward I-8 and an at-grade crossing, all because the project's fence will provide a 50-100-foot opening. It seems likely that building a fence across the area where wildlife cross but forcing them into what may be as small as a 50-foot opening somewhere along that fence is creating an "unnatural movement" corridor. It may still allow movement, but it's hardly natural. FEIR at 2.3-77. Moreover, the opening in the fence does not address the fact that placing a fence within the site disrupts the visual continuity of the site as a wildlife movement corridor and thus will impede movement to some degree regardless of whether or not the wildlife are able to find the opening in the fence.

Avian Fatalities

While the FEIR now discloses that there is a risk to golden eagles from collision with the gen-tie line during foraging or migration – a risk not disclosed in the DEIR – it does not adequately disclose that individual birds of all species may be injured or killed due to collisions or interactions with the solar panels themselves, or other infrastructure to be built on the site. Collision-related fatality has been observed at solar energy facilities of all technology types. Solar farms that may kill or injury all species of birds not only due to their transmission lines, but also through PV panels and poles, trough systems, fencing buildings and more. In fact, at solar facilities collision hazards to birds are greatest not due to the utility lines but due to the solar field arrays. And there is no evidence to suggest that the collisions are necessarily caused only by the so-called "lake effect," but even if they were, the FEIR is wrong in concluding that the "lake effect" could not occur at this site.

Data from other solar projects in Southern California, including PV projects (Desert Sunlight, California Valley Solar Ranch, Blythe Solar Power, McCoy Solar Power, Solar Gen 2, Campo Verde, ISEC West and ISEC South) indicate that birds are susceptible to collisions with solar panels and structures as well as lines (Walston et al. 2016; Ironwood Consulting, Inc. 2014; Western Ecosystems Technology, Inc. 2018; Mortality Reporting 2014; Heritage Environmental Consultants, LLC 2014-2016; Dudek 2018 and 2019). Federal and State listed species as well as several species of special concern have been found dead on these sites during systematic avian mortality monitoring, and this data represents only what has been documented in the area in which the surveys were performed and only the birds found during those surveys or incidentally and thus do not represent every species or individual killed on a solar farm site as a result of the solar farm project.

It is not only the golden eagle that is impacted by the potential for injury or death due to collision with the solar panels and other infrastructure to be built at the site. Every single avian species that occurs or has the potential to occur on the site could be injured or killed by such collisions. The discussion of permanent direct impacts on nesting birds through direct grading, clearing or grubbing in preparation for construction – all short-term impacts – do not adequately describe the permanent impacts possible from collisions with the solar panels and other equipment that will be permanently on the site. The FEIR's conclusion that potential permanent direct impacts to the golden eagle individuals – and its later conclusion in Impact B1-W-6 regarding permanent indirect impacts to special-status wildlife species, would be less than significant is not adequately supported.

Given that death and injury can occur from impact with the solar panels and other infrastructure, and not the lines alone, the fact there may be "minimal" overhead line or that the project incorporates mitigation measure PDF BIO-1 which is designed to reduce impacts to power lines does not fully mitigate the significant impact. Similarly, the FEIR briefly discusses potential collisions with utility poles but concludes that given there are only a "small number of poles" the impact would be less than significant. FEIR 2.3-59. However, there are a large number of solar panels on the project site, and yet the EIR contains absolutely no discussion of the potential for collision with those solar panels, despite reams of reports documenting the danger at other California solar farms.

As discussed above, the conclusion under Impact B1-W-6 that impact to avian species due to a “minor risk” of collision with a “small number” of utility poles fails to adequately disclose the direct significant impact that would occur to avian species from collision with the solar panels. The FEIR does not adequately discuss the well-known impacts to birds from collision with solar panels themselves. Incorporating the APLIC standards in PDF-BIO-1 will not address the impacts from the collision with solar panels.

As a result, mitigation for impacts from hitting the solar panels and other infrastructure must also be addressed and the FEIR recirculated once that information is included. This is also at issue in the FEIR’s discussion on page 2.3-78, in which it discusses only the potential for birds to collide with the gen-tie line during migration, which it assesses as low risk “due to the minimal overhead line,” and then finally discusses collision with solar panels, but in a way that is misleading and inaccurate. There are numerous reports documenting the devasting effects caused when solar panels and avian species collide, the FEIR downplays the issue by discussing only a “pseudo-lake effect” that it states may be caused by “certain types” of solar panels that appear like a body of water. The FEIR states that “there is little scientific information available regarding the pseudo-lake effect, and a detailed discussion of the impacts would be speculative.” FEIR at 2.3-78. This ignores the voluminous data from, among other solar projects in the area, Desert Sunlight, California Valley Solar Ranch, Blythe Solar Power, McCoy Solar Power, Solar Gen 2, Campo Verde, ISEC West and ISEC South that, contrary to the FEIR’s statements, shows that in fact birds are susceptible to collisions with solar panels and that Federal and State listed species as well as species of special concern have been found dead on these sites during systematic avian mortality monitoring. These include Walston et al. 2016; Iron wood Consulting, Inc. 2014; Western Ecosystems Technology, Inc. 2018, Mortality Reporting 2014; Heritage Environmental Consultants, LLC 2014-2016 and even Dudek in reports in both 2018 and 2019.

This issue led the Crimson Solar Project in its EIS/EIR/PA to conclude that there is sufficient data from existing projects that some level of avian fatalities will occur on site during the life of the Project and there is potential that some of the fatalities will be listed or special status species. Crimson Solar Project Draft EIS/EIR/PA at 3.3-34 (November 2019). That solar farm FEIR concluded that “the risk appears to be inherent to the infrastructure necessary to produce renewable electricity.” *Id.* That conclusion and the Project FEIR’s contrary conclusion cannot be reconciled. At a minimum, the evidence supporting the FEIR’s conclusory statements that “there is little scientific information available” and “discussion of the impacts would be speculative” (FEIR at 2.3-78) is contradicted by the evidence cited in the Crimson Solar Project document, including the assessment of avian mortality at utility scale solar energy facilities in the United States authored by Leroy J. Walston, Katherine E. Rollins, Kirk E. LaGory, Karen P. Smith, Stephanie A. Meyers, published in Renewable Energy, Volume 92 (2016) at 405-414 (ISSN 0960-1481) and available at https://doi.org/10.1016/j.renene.2016.02.041 (https://www.sciencedirect.com/science/article/pii/S0960148116301422), which estimated that estimated that the hundreds of utility-scale solar farms around the US may kill nearly 140,000 birds annually. Id.

The mitigation measure proposed to mitigate these impacts to less than significant levels does not suffice to accomplish that result, given that the impacts are not limited to power lines and the mitigation measure does nothing to address the other causes of avian death and injury discussed above. Other solar farms have provided compensatory mitigation to help address this issue, for example, along with facility design elements to reduce the impacts and monitoring based information, none of which are provided here. The project reduces the likelihood of survival and recovery of listed species in the wild, as evidenced by the discussion of, among other things, avian deaths due to both collision with solar panels as well as overhead lines and other infrastructure, and could result in the killing of migratory birds as discussed above as well as take of golden eagles.

A Table listing recommended restricted activity dates for the bats should be added to the FEIR similar to the one provided in Table 2.3-6 for the Burrowing Owl restrictions.

Cultural Resources

This project is on land that is held sacred by Native American tribes. Carmen Lucas of the Kwaaymii Laguna Band of Mission Indians informed Dudek that Jacumba is a sacred area and in fact not only is Jacumba a sacred area but that “not one inch” of the area does not have cultural significance. She recommended not only that a qualified Native American monitor be present during surveys for the Proposed Project, but also that forensic dogs be used to identify human remains and that the dog analysis should dictate the design of the solar facility. However, forensic dogs were not used during the surveys, despite that request, and only pedestrian surveying was conducted.

The FEIR seems to take the position that because there used to be agricultural use in the area, and because a utility corridor transects the northern portion of the project site, there can be no impact from the project on the cultural resources and history of the area. That is not the case. The fact that the project footprint would largely be in area previously farmed is irrelevant to the drastic change in setting that the project as proposed, or even the Community Buffer Alternative, would bring about. The Community Buffer Alternative only buffers the nearest residents from the visual impact on setting that the project would cause and does nothing to mitigate the drastic transformation in setting along the entrances to the community at Old Highway 80, or as it impacts the Jacumba Hot Springs resort.

Aside from Native American cultural resources, there is also the issue of impacts to the Jacumba Hot Springs Resort. The destination resort, first built in the 1920s, attracted movie stars to the area for decades. It is now poised for redevelopment into its former glory as a visitor-serving and community enhancing destination resort, but the ability to accomplish that goal is threatened by the project’s wholesale change in the character and aesthetics of the immediate area, including the access to the resort. The impacts from the change from rural community to industrial utility-scale solar farm on the historic community and the Jacumba Hot Springs Resort itself was not analyzed, with the analysis instead being improperly narrowly focused only on structures within the property boundary itself, ignoring the project’s impact on the adjacent community resources.

Hazards and Hazardous Materials

The Project is within the Jacumba Airport AIA in both Review Area 1 and 2, and is in safety zones 2, 4 and 5. It is required to comply with the Jacumba ALUCP lot coverage requirements but uses the lack of precise discussions of solar farms in the ALUCP to mislead on the lot coverage issue. The FEIR states that, "Solar panel energy production," while not specifically addressed in the ALUCP, " is most similar to the utility use 'cell phone tower, wind turbines,' which is marked compatible [in the ALUCP] and allowed with 50% lot coverage in Zone 2 and 70% lot coverage in Zones 4 and 5.2 and 4, respectively." FEIR at 2.6-31-32.

The project is not most similar to a cell phone tower or a wind turbine. To assume that it is, as the FEIR does, underestimates and overlooks the project's significant hazard to airport safety. There is little area between solar panels upon which a plane can land. While a glider or airplane can avoid a cell tower and land in an emergency situation on the open space surrounding that tower, or, similarly, a wind turbine, the space between solar panels is minimal. When added altogether, the small area between each solar panel when considered cumulatively as if it were all in one combined space may appear to meet the lot coverage requirements, but when looked at realistically, and individually as the pilot will have to do when he or she is in such a situation, it becomes clear that the lot coverage maximums are not close to being met.

The FEIR relies on the argument that "the area between each solar panel is not included as lot coverage because the ground is openly exposed to the sky and there is no vertical projection above grade." While technically that may meet the County Zoning Ordinance's definition of "lot coverage," it does not meet the spirit or intent of the ALUCP's safety concerns. The fact that the ALUCP itself does not give better direction on how to account for solar farms does not therefore allow the project to simply create a hazard that it avoids disclosing or analyzing by virtue of that fact.

As the Draft EIR acknowledged (though the language has been stricken from the FEIR), if the area of the solar panels, including the space between the panels, is included, the lot coverage for the project is more like 88%, which does not meet the requirements of the ALUCP. Taking advantage of the County's lot coverage calculations (which were designed to address residential and typical commercial uses and not the unique characteristics of a utility-scale solar farm) to grossly understand the actual situation that would face a pilot in needing to make an emergency landing could lead to disastrous results. While the project was redesigned to attempt to address this issue, by increasing the Project's internal access road in the vicinity of the west end of the airport runway to 80 feet in width and increasing setbacks along both the north and south sides of Old Highway 80, and that change is appreciated and would help with the safety concerns, the fact of the hazards posed has never been adequately discussed and the additional width now provided does not change the inappropriate calculation methodology used to get around the lot coverage restrictions of the ALUCP.

The FEIR proposes a new mitigation measure to address the glare issues to glider pilots that the DEIR had failed to discuss. While the measure may indeed address the issue, how can the reader (and pilots) be assured that the requirement will be monitored and enforced? The measure requires that all PV panels south of Old

Highway 80 use a minimum 20 degree east facing wake angle, and that all PV panels north of Old Highway 80 and south of the SDG&E Transmission Corridor have afternoon backtracking disabled and instead stay at their maximum 52 degree west facing rotational limit until after the sun has set. Will the County be sending a knowledgeable inspector to confirm that the PV panels in that location meet these criteria? It is a concern given that it almost certainly reduces the energy produced by constraining the panels in that location to meet these criteria, and it would not be typical, so assurance that it will be properly installed and set and that the panels continue to operate under these constraints is essential to ongoing safety.

Mineral Resources

It is unclear if the 40% waste factor is appropriate for the mineral resources lost to open space, given that the FEIR states that "boring logs are unavailable for the potential mineral resources" for that area. FEIR at 2.8-11. The FEIR also understates the impact by assuming that the loss is not permanent, by assuming that in 38 years or so the project (other than the Switchyard Facilities) would be decommissioned. As discussed elsewhere, however, it is unlikely once this project goes in that it will not either be updated with new equipment and its life extended, or a similar solar use taking advantage of the permanent Switchyard Facilities would then take its place. The FEIR also misleads the reader as to the scope of the issue by simply stating that the loss exceeds the County's $12 million threshold, without noting that it is a loss valued at $216 million dollars – more than 18 times the threshold.

Noise

The noise mitigation measure fails to fully address the issue. M-NOI-2 states that "Affected property owners shall be notified in writing two weeks prior to the use of PV panel washing activity with 500 feet of their property boundaries." FEIR at 2.9-41. But it's not clear what the property owner is supposed to do once notified – move, with the provided two weeks' notice if they do not want to be subjected to noise? Complain, in which case some change would be made? The only requirement is of notification, nothing is said as to what substantively would be done to prevent the noise from becoming a nuisance in the event that the PV panel washing is moved within 500 feet of a home.

Wildlife

The majority of the 623-acre solar facility would be constructed in areas classified as a High FHSZ by CAL FIRE (CAL FIRE 2007a). Although the western portion of the development footprint is classified as Moderate FHSZ, a portion along the western boundary of the development footprint is classified as a Very High FHSZ, and the lands adjacent to the west of the Project site are classified as very high FHSZ. According to the FEIR, the land surrounding the proposed solar facility is classified predominantly as Very High FHSZ to the west and High FHSZ to the east. The FEIR assumes that areas left undisturbed by the proposed project are not at any heightened risk due to development of the project, but that is not the case. Adding hundreds of thousands of solar panels adjacent to hundreds of high and very high fire areas is a recipe for disaster.

What could cause a fire to occur? A 100 MW solar farm hosting around 300,000 to +400,000 solar panels (modules) will generally have over 1,000,000 physical made electrical terminations. Each one of these terminations operates at around 1500 Volts and each termination could fail. Electrical equipment failure is well known to be linked to situations where abnormally high temperatures can be observed. Fire, sparking, arching or melting exposes electrical equipment to further damage and degradation exacerbated as moisture ingress occurs. Electrical failure can occur due to various factors and although the commonly seen issue will generally arise due to high resistive joints it is not uncommon to observe how the environment impacts equipment overtime. Electrical termination temperatures can reach over 120° Celsius, under these conditions, equipment will begin to deteriorate, over time plastics will have already begun to deform or melt and visible signs or smells will be present.

The importance of maintenance in large scale solar facilities isn't just about keeping the system online and generating. The responsibility extends to the environment directly surrounding the equipment and stretches past the boundary fence line. Grass fires for example could easily occur. A buildup of dry vegetation underneath single axis trackers or fixed tilt arrays can become a fuel load for an unwanted fire. Neglecting PV module health, visual inspections, periodic testing and quality control could also lead to failure. Animals like birds, possums, rats or mice could have built a grass nest underneath. Debris can lead to the perfect situation that leads to a fire. Electrical equipment installed out in an open field that use to be the location of a farm or rural area is always going to house a large array plants and animals, and any opening carelessly left unsealed creates the potential for electrical failure that can lead directly to a wildfire.

Historically underreported by the U.S. Fire Administration, Lawrence Shaw of Higher Powered, LLC has found that fires at solar installations rose 36% from 2017 to 2018. Since 2015 the Fire Administration has recorded 155 fires caused by solar installations.

Decommissioning/"Temporary" Nature of Project

The end of a solar project's life cycle will trigger either decommissioning of the system or re-commissioning or repowering (installation of a new system). While solar panels have a manufacturer's expected life of 20-25 years, the industry does not have much experience with decommissioning and re- commissioning of solar facilities because systems built more than 20-25 years ago are rare, and those systems came with no such warranty and are quite different from the panels with warranties today. In addition, useful life will vary among owners and will be dependent upon a particular system's production, an individual assessment of operating and maintenance costs, and costs and benefits of repowering the system. As an example, a system constructed on a school in Massachusetts is still producing about 90% of its original design output 29 years after being installed. For these reasons and more, including the permanent Switchyard Facilities that are planned to be built on-site, the most likely result is that if this project is built, the land will remain at solar farm as a permanent use.

The decommissioning assumptions used throughout the document are crucial to the adequacy of the analysis. For example, under Mineral Resources, the FEIR relies on decommissioning to state that mineral resources will not be permanently lost. *See* FEIR at 2.8-13 ("The Proposed Project components, with the exception of the Switchyard Facilities, would be decommissioned at the end of the Project life. Therefore, the Proposed Project is considered to be an interim use and would not result in a permanent loss of mineral resources.") The FEIR definitively assumes the project will be decommissioned after 35 years, even though the Switchyard Facilities will remain. Where is the guarantee that the decommissioning will take place, especially if the equipment continues to have a viable life, and the location would now have a permanent switchyard as well as 138kv line?

Alternatives

An EIR's alternatives must be able to implement most project objectives, but they need not be able to implement all of them. *Mira Mar Mobile Community v City of Oceanside* (2004) 119 CA4th 477, 489. The CEQA guidelines dictate that an EIR's analysis should focus on alternatives that can eliminate or reduce significant environmental impacts even if they would impede attainment of project objectives to some degree or be more costly. 14 Cal Code Regs §15126.6(b). The significant, currently unmitigated impacts to aesthetics, including community character, as well as the project's inconsistencies with the General Plan and Subregional Plan identified herein, can be mitigated to less-than-significant levels and be found consistent with the relevant policies, goals and vision statements of the applicable plans should the project set back the solar panels and associated equipment along the lines outlined in the Jacumba Sponsor Group's Equity Balance Alternative. That Equity Balance Alternative reduces the project's significant impacts while still allowing the project to attain most of its basic objectives. It may be a little more expensive to do so, or perhaps a little less convenient; it may produce 80 megawatts rather than "up to 90" megawatts, but 80 megawatts is "up to" 90 and 80 megawatts achieves most of the basic project objectives, which is all that CEQA requires. The FEIR's project objectives are written specifically to enable it to reject any project that would still provide the region with renewable energy while also helping to protect the existing community and its goal for its future. The developer does not care about a small, rural community.

An alternative that would substantially reduce the project's significant environmental impacts should not be excluded from the analysis simply because it would not fully achieve the project's objectives. *Habitat & Watershed Caretakers v City of Santa Cruz* (2013) 213 Cal. App. 4th 1277, 1304. The CEQA Guidelines assume that the alternatives described in an EIR will not necessarily attain all of the project's objectives. *Watsonville Pilots Ass'n v City of Watsonville* (2010) 183 Cal. App. 4th 1059, 1087. There is no requirement that the alternatives included in an EIR satisfy *every* basic objective of the project. *California Native Plant Soc'y v City of Santa Cruz* (2009) 177 Cal. App. 4th 957, 991. The Jacumba's Equity Balance Plan is consistent with the basic purposes of the project. The community's alternative achieves the basic purposes – providing significant renewable energy to the region – in what would continue to be the largest solar farm ever approved in San Diego County.

The County should not use artificially narrow project objectives to preclude consideration of reasonable alternatives for achieving the project's underlying purpose. *North Coast Rivers Alliance v Kawamura* (2015) 243

Cal. App. 4th 647, 669 (EIR on program to protect plants from invasive insect pest failed to consider control as alternative to eradication); *County of Inyo v City of Los Angeles* (1977) 71 Cal. App. 3d 185, 203 (EIR for expansion of groundwater extraction program failed to consider water conservation as alternative to increased groundwater extraction). And certainly, the range of alternatives to be considered should not be limited by the timing of tax credits or rebates or a contract entered into prematurely. The range of alternatives analyzed in an EIR should not be confined by any prior contractual commitments that would impede the project proponent from implementing reasonable project alternatives, such as that proposed by the people that will bear the brunt of the impacts from the project. *See Kings County Farm Bureau v City of Hanford* (1990) 221 Cal. App. 3d 692, 736.

Mitigation and alternatives are the very core of CEQA, and '[I]t is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects . . . .” *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564; Watershed Caretakers v. City of Santa Cruz (2013) 23 Cal. App. 4th 1277, 1302, 1304-05.

The Jacumba Equity Balance Plan meets all the requirements for an alternative under CEQA: It can substantially reduce significant environmental impacts; can attain most of the basic project objectives; is potentially feasible; and is reasonable and realistic. Its effects can be reasonably identified, its implementation is neither remote nor speculative, and it would achieve most of the basic project objectives while reducing the project’s significant impacts. While the Community Buffer Alternative, as revised, addresses some of the project’s significant impacts, particularly near the community park, it does not address the primary significant impacts to the community character and to views from the majority of the community and along Old Highway 80. The only way to do so is to increase the buffer more than the minimal 3% the project has proposed, and more and in a different locate than the Community Buffer alternative proposes.

The FEIR also improperly rejects the Distributed Generation alternative, saying that based on data for average systems installed in California in 2017, the average size of a residential rooftop PV system is 6.2 kW DC and therefore it would require too many home rooftop systems to achieve the desired capacity. First of all, the number of homes adding solar continues to increase. “In the last decade alone, solar has experienced an average annual growth rate of 42%,” according to a Solar Energy Industries Association Report, which shows a significant increase in rooftop solar since 2017. Moreover, the FEIR ignores the potential for solar on commercial buildings, which a UC Davis study says is the future of solar. Indeed, companies such as Walmart, Apple, Target and Amazon are striving to meet their sustainability goals and often find rooftop solar on their large buildings the perfect way to accomplish their goals. This ability to produce the necessary renewable energy through placing solar farms on commercial rooftops, especially at large warehouses such as those owned by Walmart and Amazon, as well as the ability to place solar farms on brownfields, former mining sites and other areas without the natural resources in place here, were ignored in the FEIR’s desire to prematurely reject distributed generation as a viable alternative to destroying the community of Jacumba’s character, views and setting.

“I don’t think any ecologist in their right mind would be against renewable energy development,” Ecologist Steve Grodsky, a UC Davis postdoctoral scholar who is co-director of Wild Energy Initiative, a project of the UC Davis John Muir Institute of the Environment, has said. “There are ways we can site solar facilities that might lessen the impact on wildlife communities. But ultimately, I think we need to move away from developing renewable energy on undeveloped lands. There are plenty of marginalized lands where the ecological impacts would be far less.” Lots of places, according to research from the UC Davis lab: former landfills, superfund sites, already disturbed public lands, and perhaps most promising, existing rooftops. In fact, 40% of all energy consumption in the U.S. is associated with buildings. But, with the right incentives in place, buildings could become one of the largest renewable energy producers.

A study published in November 2015 by the Carnegie Institution for Science and Stanford University (Carnegie Study) showed that solar power developers in California have been using mostly undeveloped desert lands with sensitive wildlife habitat as sites for new solar power installations rather than building on less sensitive, previously developed open lands. That number has only increased since. The study shows the ecological footprint of solar power development could grow to more than 27,500 square miles — roughly the land area of South Carolina — if the U.S. were to adopt a more ambitious climate goal. When thousands of solar panels are built in undeveloped natural areas, the panels crowd out wildlife and destroy their habitat.

“Solar takes out a lot of territory, right? It obliterates everything,” University of California-Santa Cruz ecologist Barry Sinervo, who is unaffiliated with the study, said. “There is as much plant biodiversity in the Mojave as there is in a redwood forest. The key part of this is, do we want to tile out the last largest wilderness area that we have, which is the Western desert?”

The Carnegie study found that of the 161 planned or operating utility-scale solar power developments in California, more than half have been or will be built on natural shrub and scrublands totaling about 145 square miles of land, roughly the land area of the city of Bakersfield, Calif. About 28% have been built on agricultural land and 15 percent have been built in developed areas.

Yet areas that have already been developed and have little wildlife habitat would be better suited for solar development from an ecological standpoint, said study lead author Rebecca Hernandez, a postdoctoral fellow at University of California, Berkeley, and a former ecologist at the Carnegie Institution. “We see that ‘big solar’ is competing for space with natural areas,” Hernandez said. “We were surprised to find that solar energy development is a potential driver of the loss of California’s natural ecosystems and reductions in the integrity of our state and national park system.” Hernandez’s team found that there are more than 8,500 square miles of land throughout California that is less environmentally sensitive than desert scrubland and agricultural land that would be best suited for future solar power development. Those impacts show the need to not reject this alternative out of hand, as the FEIR has done.

A study by Stanford University published in the journal Nature Climate Change says that solar power plants could be built in developed areas between or atop buildings and homes without having to impact the desert, by

building in California's cities, which are often overlooked as areas ideal for both utility-scale photovoltaic and concentrating solar power generations. The research looked at developed land more efficiently by encouraging the construction of utility-scale solar development there rather than building large solar installations in environmentally sensitive undeveloped places. The study specifically modeled land-use efficiency for solar only in California because the state leads the U.S. in solar power generation. *See* Hernandez, R., Hoffacker, M. & Field, C. Efficient use of land to meet sustainable energy needs. Nature Clim Change 5, 353–358 (2015). https://doi.org/10.1038/nclimate2556.

Just as technological improvements (bifacial modules and increased module wattage) between the circulation of the Draft EIR and the completion of the FEIR are now determined to enable the Community Buffer Alternative to maintain a 90 MW AC nameplate capacity, similar improvements could enable achievement of 90 MW with the Jacumba Equity Balance Plan alternative, or close to it. Or the power could be generated through placing the solar farm in another, more appropriate location, as the studies above discuss. Certainly, given the level of significant impacts this project as proposed causes, it should not be approved as currently proposed.

Recirculation is Required

The sheer number of revisions between the DEIR and the FEIR (the summary of changes alone is 78 pages) suggests that the public could benefit from recirculation and more time in which to review the many new pages of information. In addition, the Jacumba Equity Balance Plan is a feasible alternative that would mitigate most if not all of the remaining significant unmitigated impacts and if not adopted would require recirculation. *See Save Our Peninsula Comm. v Monterey County Bd. of Supervisors* (2001) 87 Cal. App. 4th 99, 131 (information on important new mitigation measure, added to record after EIR was completed, should have been included in EIR and circulated for public review and comment because of questions raised about its effectiveness and potential impacts).

Best regards,

Donna Jones

Donna Jones Law

Enclosures:

1. Solar Energy Industries Association, "Solar Industry Research Data"
2. Climate Central, "Cities Could Be Ideal for Utility-Scale Solar Panels"
3. Climate Central, "Study Sees Ecological Risks as Solar Expands"
4. UC Davis, "Environmental Impacts of Utility-Scale Solar Energy"

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To: Barnhart, Douglas; Calvo, Yolanda; Edwards, Michael (LUEG); Flannery, Kathleen; Hitzke, Ginger; Hough, Tommy; Jimenez, Ann; Nicoletti, Vince; Pallinger, David; Ashman, Ronald; Slovick, Mark; Smith, Ashley; Talleh, Rami; Tessitore, Lynnette; Brown, Bronwyn; Koutoufidis, Nicholas
Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 8, 2021 10:39:40 PM

SpeakUp

New eComment for Planning Commission Hearing

Andrew Diefenbach submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: We all know we need renewable energy to meet state mandates. We do not need to destroy the town of Jacumba Hot Springs in the process. The Equity for Jacumba alternative plan gives Jacumba the chance for a future and a chance to grow while giving the developer adequate acreage to generate plenty of renewable energy. Compromise is a good thing!

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 8, 2021 7:56:04 PM

SpeakUp

New eComment for Planning Commission Hearing

C W submitted a new eComment.

Meeting: Planning Commission Hearing

Item: www.sandiegocounty.gov/pds/PCHearing. Large groups wishing to comment on a common item are encouraged to submit e-comments or to identify one spokesperson to join the teleconference on behalf of the group. If you have any questions, please contact the Planning Commission Secretary at Ann.Jimenez@sdcounty.ca.gov.

eComment: Please don't do it his to us. We are a already a community that is struggling. Just because we are on the outskirts of San Diego, everyone thinks they can just do what they want to our community. From doing mping the MANY sexual predators to this, the turbines(I think I'm correct on this) PLEASE this is so unfair. It's going to totally disrupt life here, human and wildlife. Please reconsider. Jacumba is a beautiful desert town. Don't ruin it. Thank you for taking time to read this. Blessings

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 8, 2021 8:05:13 PM

SpeakUp

New eComment for Planning Commission Hearing

Carol Johnson submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: OPPOSED to the JVR PROJECT AS SUBMITTED. REQUEST serious consideration of the “community equity plan”. The JVR plan would destroy community character, isolate residences in a sea of industrial solar panels, destroy property values, increase temperatures, and prevent any further development or revitalization which is presently ongoing. As submitted, it is classic example of “social inequity”- taking advantage of a small less affluent population which isn’t equipped to defend itself.Save Jacumba

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Subject: New eComment for Planning Commission Hearing
Date: Wednesday, July 7, 2021 5:06:49 PM

SpeakUp

New eComment for Planning Commission Hearing

Chad Bierbaum submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: I worked on the Sunrise Power Link project & the archeological monitors did not do their jobs. We found multiple artifacts in the perimeter of the tower footings before they were placed & the monitors never reported or recorded these items. Many artifacts were lost & this was not disclosed as the project continue without proper protocol. This Solar Project will continue to destroy our historical sites. I have first hand experience these energy project FEIR mitigations are not enforced.

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 8, 2021 4:00:33 PM

SpeakUp

New eComment for Planning Commission Hearing

Cristina Marquez submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: On behalf of IBEW 569, we urge your support for the Jacumba Valley Ranch Energy Park proposal. This will create 350 good, middle-class clean energy jobs for local workers, which will advance apprenticeship training opportunities and add new renewable energy to the grid. JVR Energy Park delivers on strengthening our communities while combatting climate change. Please vote to recommend this important project to support our region's clean energy goals and good quality jobs for county residents.

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Subject: New eComment for Planning Commission Hearing
Date: Wednesday, July 7, 2021 9:45:14 PM

SpeakUp

New eComment for Planning Commission Hearing

Dan Miller submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: Would be a great use of land in jacumba

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Subject: New eComment for Planning Commission Hearing
Date: Wednesday, July 7, 2021 6:47:24 PM

SpeakUp

New eComment for Planning Commission Hearing

David Wojan submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: Once again destroying natural beauty and wildlife, of our homes and community for profits of foreign investors who do not live here. Additionally absolutly no benefits to long established residents that want to preserve the land and wildlife, and will have profound negative health effects on the residents and wildlife. This will only increase the temperature that both the community and global warming do not need now or ever. This is our home, leave our water, roads, resources, and us alone!!!

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 8, 2021 11:52:51 AM

SpeakUp

New eComment for Planning Commission Hearing

Sherwood Diana submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: Last big project was border building. Big disaster for our pets here. They were run over and killed by truckers speeding thru here.

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 8, 2021 11:50:11 AM

SpeakUp

New eComment for Planning Commission Hearing

Sherwood Diana submitted a new eComment.

Meeting: Planning Commission Hearing

Item: E. Requests for Continuance

eComment: I live in a senior park where most of residents got debri in lungs and breathing difficulties , from Aat project we had , which was border. Being built here. Dust and debrie from all trucks in and out. Same thing is going to happen here with planned truckers comming in and out

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Subject: New eComment for Planning Commission Hearing
Date: Friday, July 9, 2021 7:49:36 AM

SpeakUp

New eComment for Planning Commission Hearing

Don Parfet submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: This project should be rejected entirely. This is a MOUNTAIN community with limited resources. 1. This area is far more likely that desert areas to experience cloud cover. Diminished sunlight not good. 2. This are has a LIMITED water supply. This project will stress and possibly irreparably damage the local aquifer. (see the San Diego Union article https://www.sandiegouniontribune.com/business/story/2021-07-07/water-discharge-by-sdg-e-project-in-valley-center-stopped-but-complaints-continue

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 8, 2021 6:59:07 PM

SpeakUp

New eComment for Planning Commission Hearing

Don Ruth submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: The project will block access to my property that is to the East of the project and off Carrizo Gorge. I go in and out of the property daily. I have not been approached by the solar company about this issue. It will be in front of my yard and will ruin the view from the property and the property's value.

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 8, 2021 5:24:14 PM

SpeakUp

New eComment for Planning Commission Hearing

Don Ruth submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: Our area was targeted for this project because we are a low-income and rural community. This solar project will not benefit community members - it will not create local jobs, it will not bring in visitors and it won't supply us with power. Instead it will lead to higher temperatures in the area, decrease our property values and diminish our ability to attract tourists thus generating money for those who call this area home.

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 8, 2021 10:40:09 AM

SpeakUp

New eComment for Planning Commission Hearing

ERIK CANSECO submitted a new eComment.

Meeting: Planning Commission Hearing

Item: C. Public Communication: Opportunity for members of the public to speak to the Commission on any subject matter within the Commission's jurisdiction, but not an item on today's Agenda. If you would like to speak on this item call (619) 343-2539 and use ID 333 879 56#

eComment: I am land owner in jacumba hot springs to a 37 acre property on the west side of town bordering highway 80. The enviormental report submitted clearly states that more than 90 bird species have been observed in the area. This town happens to be a very important migration point for birds and insects on their way north, i fear the large size of the project will be a magnetic interference for the migrating animals through the emf field generated, as well as consequences for the people living near.

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 8, 2021 6:01:02 PM

SpeakUp

New eComment for Planning Commission Hearing

Gabriele Schultz submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: I oppose the Solar Project in Jacumba!! I very much support the scenic Town of Jacumba which is finally coming back to its true potential of healing the People with its sacred Waters. The community has been through a lot of challenges and i wish for them to flourish and rejuvenate for a happy Generation sharing the Gifts of the Land.

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 8, 2021 6:53:33 PM

SpeakUp

New eComment for Planning Commission Hearing

Jenene Lambert submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: Home owners here in jacumba. if this continues it will be detrimental to our health and many others with allergies, breathing problems and heat issues. Wildlife, endangering our livestock, pets! No rain,the HOT temperatures make living here uncomfortable at times! Raising the temperature is not acceptable or livable! People, animals will be harmed! This project will be in our backyard! We admire the Old Farm building every sunrise! Please hear our cries! Thank you very much! God bless!

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Subject: New eComment for Planning Commission Hearing
Date: Wednesday, July 7, 2021 11:07:36 PM

SpeakUp

New eComment for Planning Commission Hearing

John Reddan submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: Another large scale project that is damaging the area by seriously degrading the livability of the area and thereby decreasing the property values, all to produce power for people that don't live in the area, and to profit a foreign owned corporation. There is nothing in this project that benefits the folks that live in the area.

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To: Barnhart, Douglas; Calvo, Yolanda; Edwards, Michael (LUEG); Flannery, Kathleen; Hitzke, Ginger; Hough, Tommy; Jimenez, Ann; Nicoletti, Vince; Pallinger, David; Ashman, Ronald; Slovick, Mark; Smith, Ashley; Talleh, Rami; Tessitore, Lynnette; Brown, Bronwyn; Koutoufidis, Nicholas
Subject: New eComment for Planning Commission Hearing
Date: Wednesday, July 7, 2021 4:49:04 PM

SpeakUp

New eComment for Planning Commission Hearing

K B submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: As a frequent visitor to Jacumba Hot Springs I strongly oppose the JVR project. This project would hurt this developing community and ruin the beautiful landscape.

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To: Barnhart, Douglas; Calvo, Yolanda; Edwards, Michael (LUEG); Flannery, Kathleen; Hitzke, Ginger; Hough, Tommy; Jimenez, Ann; Nicoletti, Vince; Pallinger, David; Ashman, Ronald; Slovick, Mark; Smith, Ashley; Talleh, Rami; Tessitore, Lynnette; Brown, Bronwyn; Koutoufidis, Nicholas
Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 8, 2021 9:43:00 PM

SpeakUp

New eComment for Planning Commission Hearing

kathryn carande submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: Strongly opposed to this. If passed it will eventually negatively effect everyone in SD County. Its not just people who lie in Jacumba who will be harmed but the thousands of people from San Diego who like to enjoy the open quality of that area. As a larger County I hope we all understand we are involved in what decision is made. Please make the right decision. Thank you.

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Subject: New eComment for Planning Commission Hearing
Date: Wednesday, July 7, 2021 6:18:07 PM

SpeakUp

New eComment for Planning Commission Hearing

Kathryn Leidy submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: Opposed The JVR solar project is not anything the people of this community want ! It would be an eye sore for everyone We do not benefit in anyway from this project and shouldn't have to surrender to greedy people who could care a less about the residents of Jacumba. Between the wildlife and our own water supply we do not need city corruption to take away what has always been a natural untouched land Keep your hands off Jacumba! !

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Subject: New eComment for Planning Commission Hearing
Date: Wednesday, July 7, 2021 4:32:17 PM

SpeakUp

New eComment for Planning Commission Hearing

Lacy Maxfield submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-20-008. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: As a resident of Jacumba for the past 30 years I oppose the JVR solar project. I've watched businesses open and close due to the impact of the government/economy and the several attempts at building the wall the construction traffic has destroyed our roads and affected our water supply and the tranquility of our small community. Our town has been a dumping ground for to long. We are finally seeing Jacumba come back to life the solar project will destroy the progress and growth of our community.

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 8, 2021 10:12:32 AM

SpeakUp

New eComment for Planning Commission Hearing

Larry Love submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: I pass through this area every year and was disappointed to learn that this project was going to be placed so near Jacumba. It seems that a location a bit further out of town would be more suitable and not distract from the scenic area near this small town.

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Subject: New eComment for Planning Commission Hearing
Date: Wednesday, July 7, 2021 6:33:13 PM

SpeakUp

New eComment for Planning Commission Hearing

Luciano Demasi submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: The construction of new solar panels would damage the visual impact of the entire region and irremediably compromise the tourism. The Jacumba town will probably die. That is particularly sad, given the historical value of the site: in the past it was a major touristic destination and that can be the future!. Creating electric energy at the expense of one of the jewels of San Diego County and natural resource of significant value, seems a questionable initiative. I strongly oppose the idea.

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 8, 2021 2:06:32 PM

SpeakUp

New eComment for Planning Commission Hearing

Matthew Spencer submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: I oppose the current proposed project and support the alternative plan to decrease the solar farms size and adjust placement so as not to encroach on this historic town that is currently being revitalized for the benefit of the residents, visitors and wildlife.

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Subject: New eComment for Planning Commission Hearing
Date: Wednesday, July 7, 2021 5:19:06 PM

SpeakUp

New eComment for Planning Commission Hearing

Michele Strand submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: I am opposed to the proposed JVR Solar Energy Park in Jacumba Hot Springs. Every "YES" vote on this project (as well as the other wind and solar projects that ruin our backcountry) is a slap in the face to those of us who bought homes to enjoy the (once-) beautiful rural area and to escape the noise and activity of city life. Create the energy where it is used! What about "Environmental Justice" for us? This project is absurd and will ruin Jacumba's local businesses and hopeful comeback.

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 8, 2021 2:36:34 PM

SpeakUp

New eComment for Planning Commission Hearing

Myra Price submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: Please do not destroy this charming town of Jacumba. While I agree with green energy I feel that this project could be moved further east and scaled down some. Our town receives no benefits from this project it does nothing to improve our way of life here. There is no reason that a project of this size should be placed right next to the town; especially when there is so much land available further east where there are no homes.

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To: Barnhart, Douglas; Calvo, Yolanda; Edwards, Michael (LUEG); Flannery, Kathleen; Hitzke, Ginger; Hough, Tommy; Jimenez, Ann; Nicoletti, Vince; Pallinger, David; Ashman, Ronald; Slovick, Mark; Smith, Ashley; Talleh, Rami; Tessitore, Lynnette; Brown, Bronwyn; Koutoufidis, Nicholas
Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 8, 2021 8:25:53 AM

SpeakUp

New eComment for Planning Commission Hearing

Norm Gallagher submitted a new eComment.

Meeting: Planning Commission Hearing

Item: www.sandiegocounty.gov/pds/PCHearing. Large groups wishing to comment on a common item are encouraged to submit e-comments or to identify one spokesperson to join the teleconference on behalf of the group. If you have any questions, please contact the Planning Commission Secretary at Ann.Jimenez@sdcounty.ca.gov.

eComment: The planned solar farm must be considered totally for what it is, an artificial machine to be slapped in the middle of a sensitive desert environment. Approval should consider, and accommodate human and faunal requirements only, and approved only those elements that will benefit both both short and long term objectives. The current proposal and it's proponents has not met that goal, per those who should have the say.

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 8, 2021 6:54:10 PM

SpeakUp

New eComment for Planning Commission Hearing

Ri Parrish submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: I live west of Jacamba and go there often. I eat at Jacamba Hot Springs and enjoy the visually un-crowded environment. Please set back any visually intrusive busy industrial looks of equipment that destroy that. Please reduce the gigantic-ness of this project by scaling it back at least 50% in the beginning so that we can see just how considerate a commercial group can be in accommodating our concerns instead of the ongoing being dumped on Jacamba by governmental decision making processes.

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To: Barnhart, Douglas; Calvo, Yolanda; Edwards, Michael (LUEG); Flannery, Kathleen; Hitzke, Ginger; Hough, Tommy; Jimenez, Ann; Nicoletti, Vince; Pallinger, David; Ashman, Ronald; Slovick, Mark; Smith, Ashley; Talleh, Rami; Tessitore, Lynnette; Brown, Bronwyn; Koutoufidis, Nicholas
Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 8, 2021 9:39:59 PM

SpeakUp

New eComment for Planning Commission Hearing

Richard Johnson submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: I strongly oppose the total obliteration of the historic Mountain Meadow Dairy buildings. Having read the historical resources technical report, it was perfunctory at best. In fairness, it demands further review. Additional multiple resources/photos are available. As one of the earliest dairies (1918) and largest local employer (50 people 1000cows) it was intimately connected with the community and the development of dairy innovations in California and the winner of multiple awards.

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Subject: New eComment for Planning Commission Hearing
Date: Wednesday, July 7, 2021 7:30:57 PM

SpeakUp

New eComment for Planning Commission Hearing

Roy Simin submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: Why would you wish to destroy one of the most historical area to put in solar to service a whole different geographical area that doesn't care about preserving natural land. People choose to live in Jacumba because of the natural desert beauty, not because they want solar vs panels. Put the Solar closer to the desert area where they need the energy, not in our back yards.

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 8, 2021 4:39:20 PM

SpeakUp

New eComment for Planning Commission Hearing

Russell Hubbard submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: Vote NO. Serious interruption to quality of life in Jacumba Hot Springs and interruption of wildlife corridor to Anza-Borrego Sate Park. Recc: reduce size of array and move south toward US border.

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To: Barnhart, Douglas; Calvo, Yolanda; Edwards, Michael (LUEG); Flannery, Kathleen; Hitzke, Ginger; Hough, Tommy; Jimenez, Ann; Nicoletti, Vince; Pallinger, David; Ashman, Ronald; Slovick, Mark; Smith, Ashley; Talleh, Rami; Tessitore, Lynnette; Brown, Bronwyn; Koutoufidis, Nicholas
Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 8, 2021 4:01:35 PM

SpeakUp

New eComment for Planning Commission Hearing

Sam Schultz submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: There are many other locations close to the power link that would not destroy the ability of our town to prosper. And this project will make us even more of an urban sacrifice zone. Please have mercy on us, we can't do for you those things that the wealthy investors can. We are worth saving

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 8, 2021 11:04:37 PM

SpeakUp

New eComment for Planning Commission Hearing

Steven Powell submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: Project will block a 50+ year old access road to my properties that are off Carrizo Gorge Rd just north of Unnamed County Rd. Myself and other property owners have been going in and out of our properties continuous and uninterrupted for many years on that access road. We have not been approached by the solar company or landowner about this issue or access road. This project will destroy land, reduce property values, ruin a historic town county airport. I expect access to my properties unfettered

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Subject: New eComment for Planning Commission Hearing
Date: Wednesday, July 7, 2021 5:36:44 PM

SpeakUp

New eComment for Planning Commission Hearing

Tracy McPherson submitted a new eComment.

Meeting: Planning Commission Hearing

Item: www.sandiegocounty.gov/pds/PCHearing. Large groups wishing to comment on a common item are encouraged to submit e-comments or to identify one spokesperson to join the teleconference on behalf of the group. If you have any questions, please contact the Planning Commission Secretary at Ann.Jimenez@sdcounty.ca.gov.

eComment: Oppose

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 8, 2021 8:46:11 AM

SpeakUp

New eComment for Planning Commission Hearing

Walker Frankenberg submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. JVR Solar; PDS2018-MUP-18-022. If you would like to speak on this item call (619) 343-2539 and use ID 4803 576 046#

eComment: This project is too big to be next to a small town of jacumba,to ruin jacumba visually for the next 30 years, my children and grand children are going to have to deall with the repercussions of the effects of this project, we have a airport what happens if there a emergency landing ,this project should not be allowed to go through. Thank you

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From: Billie Jo Jannen, Chairman, Campo Lake Morena Community Planning Group

To: San Diego County Planning Commission Planning Commission: Ronald Ashman, Douglas Barnhart, Yolanda Calvo, Michael Edwards, Ginger Hitzke, Tommy Hough and David Pallinger

July 8, 2021

Re: The Equity for Jacumba Alternative; Jacumba Valley Ranch industrial solar array

Dear Commissioners:

I chair the Campo Lake Morena CPG. We have been unable to meet on our regular schedule due to medical absence by a member we need present to have a voting quorum. Therefore, the group has not met to vote specifically on the Jacumba solar project. We HAVE, however, voted on many past comments regarding industrial solar. Today, I am sharing excerpts from our already-adopted language that are germane to discussions of social justice and permanent harm to sequestration of greenhouse gases connected with all solar projects in general.

Justice and equity for a politically impotent minority
Both the Board of Supervisors and the Planning Commission have a duty to balance fairness and social justice of projects that are proposed only for the interests of the state. The potential for social and financial harm from renewables is very high. Small rural towns cannot defend themselves at the polls, so it is the responsibility of our representatives to stand up for us. This is the right thing to do.

From our January 1, 2021 comment on renewable streamlining and proposed energy overlay project: *"This project raises the issue of social justice for our small population vs the dense urban population who would receive all the benefits. Social justice is considered important enough by the state and county that it is currently being addressed as a general plan update. Our communities can neither fight back, nor access the power generated by this project. We are forced to to take all the negatives and receive zero benefit from them. We are a politically defenseless minority, which has made us the target of a number of perfectly awful proposals by politicians who know we haven't the power to vote them out of office. What's more, according to the county's own calculations in the social justice update, Campo and most of the backcountry is teetering on the brink of incomes and pollution levels that make them a social justice concern, even before vast fields of other people's industrial energy production are thrust upon them."*

Please don't just shrug and take the attitude that "you have to break a few eggs" in order to move forward. These are people's lives we're talking about here, and there are far better ways for the state to promote the use of renewables than to spend billions in tax benefits

and easy permitting for giant foreign corporations who have no stake in the health and financial wellbeing of our community members. If you don't care, who will?

Inadequate calculations of greenhouse gas
Project developers have very little upon which to base their calculations without area-specific numbers on what is being sequestered in chaparral range and wildland, and SDC staff has done nothing to obtain analysis or suggest better sources for it. Using the boilerplate numbers provided by Natural Resources Defense Council and International Panel on Climate Change doesn't work because they have measured lands that are drastically different from our backcountry. In fact, **any EIR that relies on pasture or forest numbers to compute permanent GHG releases on chaparral lands should be rejected out of hand.** Computations should come from specific measurements on the types of land and vegetation we have here.

In a March 14, 2019 comment letter on the Boulder Brush NOP, CLMPG wrote: *"Wildland and agricultural scientists have been studying soil sequestration **for over 30 years**, and work has become intensive in recent years. Methods of physical measurement and quantification have been refined and there is not a single reason – other than simple disinclination -- for county staff to neglect consulting with these experts. Some of these researchers are located right here in San Diego County. At what point is the science "old" enough to be used for practical purposes?*

According to research on carbon sequestration in arid biomes, soil sequestration – and not surface vegetation – is the greater part of local greenhouse gas-holding capacity. The Food and Agriculture Organization of the United Nations writes: "In dryland environments, soil organic carbon in the first 100 cm soil amounts to about 4 tons/hectare." http://www.fao.org/3/y5738e/y5738e07.htm#TopOfPage

Subsoil biological agents – mostly bacteria – sequester this carbon and are permanently destroyed when the soil is disturbed. https://phys.org/news/2014-04-arid-areas-absorb-unexpected-amounts.html.

According to the 2014 study "Spatial Distribution of Soil Organic Carbon and Its Influencing Factors in Desert Grasslands of the Hexi Corridor, Northwest China," arid regions worldwide contain 40 times more carbon than what has been released due to human activity, adding, "soils in these regions are fragile and may experience degradation, desertification, wind erosion, and overgrazing. Small changes in soil conditions can modify the original balance of soil carbon cycle, increase the C loss from soil, and release more greenhouse gases into the atmosphere. Therefore, SOC storage in the desert-grassland ecosystem is a critical component of global C cycle and has a considerable effect on reducing the rate of enrichment of atmospheric CO_2." https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3986398/

Unimpaired natural systems will not only hold the carbon they have, but will hold even more as atmospheric CO2 increases, making them an irreplaceable GHG-buffering resource. www.currentscience.ac.in/Volumes/106/10/1357.pdf"

From the January 1, 2021 CLMPG comment on the county's streamlining and energy overlay project: *"There is no going back, once sequestration is destroyed. Also permanent are the massive releases of GHGs and other pollutants to build wind turbines and solar panels. In China, the mining of rare earths alone has permanently destroyed vast tracts of farmland and sickened thousands of people. Fabrication pollution is as ignored as lost sequestration while we pat ourselves on the back for being so wonderfully "green."*

Without proper quantification of ALL impacts, we do not honestly know if these technologies are solving the problem of climate or making it even worse. The fact that these impacts take place in other states and countries is no reason to look the other way. Pollution doesn't recognize borders."

Please stop allowing solar and wind developers to get away with sloppy, minimal evaluations of these important considerations. Please stop approving these developments just to measure up to arbitrarily set goals or partisan ideas about climate change and the environment. Satisfying some standard set by the state is not more important than looking out for the people and wildlife that you help to govern. Please exercise the duty of care you owe to the people who live in our rural communities.

Sincerely

Billie Jo Jannen
619-415-6298

Jacumba Community Sponsor Group

July 8, 2021

To: San Diego County Planning Commission via: Ann.Jimenez@sdcounty.ca.gov; cc: Nicholas.Koutoufidis@sdcounty.gov

From: Cherry Diefenbach, Chair, Jacumba Community Sponsor Group (JCSG); 619-743-5224, csdiefenbach@sbcglobal.net

RE: July 9, 2021, Agenda item #3: JVR Energy Park Major Use Permit; PDS2018-MUP-18-022: PDS2018-ER-18-22-001

At the in-person special JCSG meeting on July 6, 2021, the JCSG voted unanimously to approve our Equity for Jacumba JVR Alternative map dated 7/5/2021, which identifies a smaller, 300-acre project area located north of scenic Highway 80, the Jacumba airport, and residences. This Equity alternative which was developed by the JCSG based on feedback from our community, strikes a balance between the JVR's green energy generation/storage objectives, and the sustainability of Jacumba Hot Springs and the natural environment. Elements of the Equity for Jacumba alternative include the following:

--Appropriate community and scenic vista buffers.

--A 1,000-foot-wide restored wildlife corridor with designated and signed community trails/pathways from the international border with Mexico to Anza Borrego Desert State Park (ABDSP) lands and a trail/pathway on the north side of scenic Highway 80 that leads to the Mountain Meadows Dairy where the developer would preserve a few selected farm buildings as an educational site for public benefit.

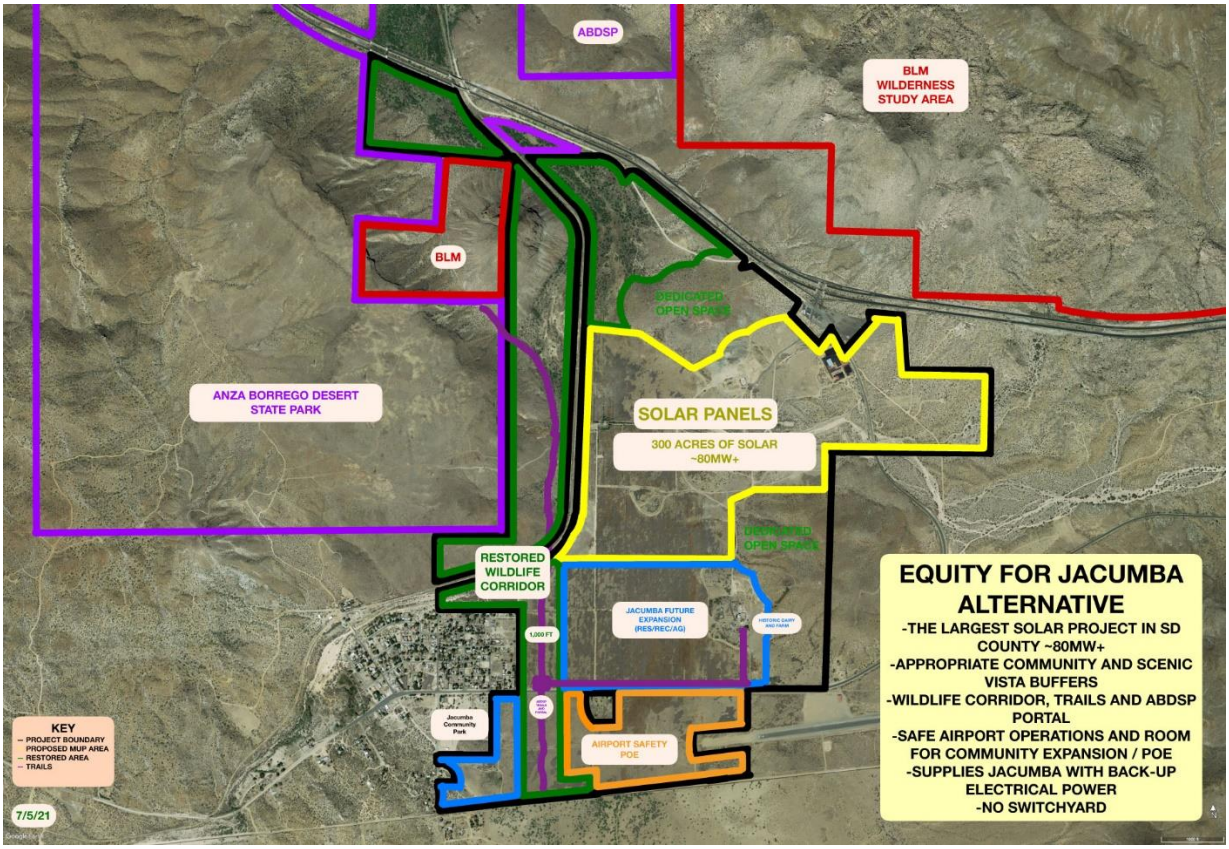
--A direct power connection from the JVR solar facility that would provide back-up power to Jacumba when SDG&E secures our power during Red Flag warnings.

--The elimination of the JVR project's 8.1-acre switchyard facilities, and the undergrounding of transmission lines that would direct the JVR's generated power from the collection substation into the electrical grid via SDG&E's nearby 58-acre East County (ECO) electrical substation. (The ECO substation was designed to eliminate the need for nearby renewable energy facilities to have their own individual switchyards.)

--Restrict the placement of solar facility components (solar modules, batteries, inverters, transformers) in the JVR MUP area south of scenic Highway 80. (This restriction would support future expansion of the town near the community center/park and the Jacumba airport, and provide a larger buffer area around the existing private residence, and the airport runaway that is used by glider planes. It would also provide an area for a future port of entry (POE) with Mexico.

--Restrict the placement of solar facility components in the central Jacumba Valley area so that the community has room to grow with our designated Rural Village area.

See Equity for Jacumba Alternative map below.



At the July 6th JCSG meeting, the group also voted unanimously authorize the Chair to submit comments regarding the PC Hearing Report of July 9, 2021 and the JVR Energy Park FEIR. The JCSG has identified many issues/concerns with the hearing report and FEIR. These include:

--A mischaracterization of the JCSG's support for the JVR Community Buffer Alternative described in Chapter Four of the FEIR project alternatives. During our May 18, 2021 JCSG meeting, Geoff Fallon, a BayWa-r.e. representative, stated that due to improvements in solar module technology, the JVR project could meet its objectives of generating 90 MW power even with the increased 300-feet setbacks found in the Community Buffer Alternative. A comment was made by a JCSG member, that if the larger setbacks (reduced acreage) in the Community Buffer Alternative would not impact project objectives, then the developer should have incorporated the larger setbacks into the revised JVR project plans dated 4/8/21. Also, a comment was made that the County as a minimum, should require those 300-feet setbacks. (Larger setbacks will help to mitigate the project noise and visual impacts on Jacumba residences.) This discussion was later followed by a unanimous vote to deny the 623-acre JVR project. (The JCSG has never voted to approve the project's Community Buffer Alternative at any meeting.)

--The inadvertent omission of JCSG's May 31, 2021 letter that should have been included in the PC Hearing report. This letter accompanied PDS Form 534 and it contains JSCG comments on the proposed the 623-acre JVR project, including reasons for the project's denial, BMP

recommendations as well as identifying some community benefits. As a result, the JCSG list of recommended project revisions found on page 3-35 of the hearing report does not include our request for the project developer to provide Jacumba with back-up power when SDG&E secures regular power to the community during periods of Santa Ana winds. It is also is missing our landscaping recommendations. As a result, PDS did not evaluate all of our recommendations, and therefore, the hearing report is incomplete.

--The JCSG does not believe that the PC Hearing report should have included the lengthy 20-year, 90MW Power Purchase Agreement (PPA) that was prematurely signed by BayWa and San Diego Community Power (SDCP) on May 27, 2021, well before the JVR MUP has completed the CEQA review process. From the community's perspective, the hearing report's promotion of this PPA agreement and the statement that "JVR Community Buffer Alternative will provide energy to over 4.4 percent of SDCP customers," makes it appear that the "fix is in" and that the developer knew that JVR project approval was all but guaranteed.

--The JCSG does not believe that the JVR Community Buffer Alternative is an interim project. It takes advantage of a "loophole" in the County Zoning Ordinance that states a MUP may granted to a Specific Planning area if it includes a bonded decommissioning plan. The Hearing Report states on page 3-15 that **"prior to the expiration of the MUP for the solar facility, the applicant could apply for and receive approval of a MUP modification to authorize further use of the site as a solar facility or return to a [land] use consistent with the Zoning Ordinance."** So even the hearing report acknowledges that an industrial solar utility is not the "right" land use. If the project does actually decommission in 2058, the massive 600+ acre JVR project will still out-last more than half of Jacumba's ~560 residents. Also, it can be expected that the property owner will apply for a MUP modification before 2058, and its approval is practically guaranteed under the County's DER initiatives. **If the JVR Community Buffer Alternate which includes a large switchyard that remains after project decommissioning is approved, there will be an industrial-scale renewable energy utility of some sort within Jacumba's rural village boundary in perpetuity.** As a reminder, the Specific Planning area in the Jacumba Valley was originally envisioned to support a large residential development which would enhance the vitality of the town and provide economic benefits to the community, not one that will destroy community character and the town's ability to thrive and grow.

The JVR FEIR and the PC Hearing report dismiss the important role that the Mountain Meadow Dairy and its successors played in Jacumba's history. The largest employer in Jacumba history, it was also one of the earliest dairy farms in the county. Although a 1928 aerial photo that documents the dairy's presence was provided during DEIR comment period, the FEIR's cultural report does not include the photo, and it continues to minimize the historical significance of the farm. (For documented historical information about the dairy, see attached excerpts from in *Renegades, Rock Houses and Resorts…Stories of Jacumba Hot Springs and Surrounds*.) While the 90-year-old farm buildings are certainly showing their age, that doesn't mean they aren't worth preserving, as they represent an important chapter in local San Diego agricultural past.

Accordingly, the community of Jacumba requests the developer be required by the County to preserve/maintain some of the former farm buildings, provide an on-site history kiosk, and provide public access to the site via a signed community pathway or trail. This educational site would be financially supported by the developer for the duration of the solar project. (This site would attract visitors and provide some economic benefits to the town.) **No solar modules should be placed of the hill where the dairy farm is located.**

--The PC Hearing report's description of the Photovoltaic (PV) modules and support structures (Pages 3-11 to 3-14), provides no definitive information about the efficiency of the PV modules that the project will use, the distance between solar arrays, etc. The report and the FEIR both fail to show a graphic that depicts the modified tracking behavior of the JVR solar modules. Those documents do not even provide a photo of a bifacial solar array, so one has been provided here.

--The JCSG questions the project requirement of vegetation growing under solar panels as this will result in a loss of PV bi-facial module efficiency. As shown in the photo above, bi-facial solar panels that are designed to capture sunlight reflected upward from the ground. (Why not use weed cloth and or gravel to prevent soils erosion and provide dust control?)

--The PC report also describes the installation of inverters and transformers on platforms raised due to their placement in a floodplain. Some of these components will be 15 feet above grade, they will be seen in spite of visual screening by a 7-foot high-slatted chain link perimeter fence. The project will also place 75 Battery storage containers at 25 locations adjacent to the inverters/transformers. They too will be raised above floodplain levels. **Remarkably, the hearing report and the FEIR not only minimize their visual impacts, they fail to justify the reasonableness of placing electrical elements in a flood plain.**

--The JVR Community Buffer Alternative seeks County approval to put Lithium-ion batteries which have a history of thermal runaway (melting) in our wildfire fire-prone landscape. Instead, the County should be requiring that solar facilities use less flammable batteries such as the iron-flow battery currently being installed at SDG&E's 1 MW solar facility in Campo, CA.

--The Hearing report and the FEIR state that perimeter landscaping will be "!8 feet tall, 10 years after planting." This is simply not realistic. (Right is a 2021 photo of the 7-year-old landscaping that is supposed to be screening the Boulevard substation. Perhaps it will be 18 feet tall in another three years.)

--The hearing report states the applicant is pursuing a project Labor agreement (PLA) which is great for the IBEW 1139 Union, but it does not provide our local Jacumba residents with any jobs. (The JCSG is not against using Union labor, and IBEW workers can still be employed during the construction of a smaller ~300-acre solar facility described in the Equity for Jacumba alternative.)

--The FEIR and the Hearing report would have you believe project impacts to local wildlife species has been mitigated to less than significant impacts. This includes the promotion of the SDG&E transmission corridor that bisects the JVR MUP area as a viable east -west wildlife corridor between two fenced project areas is ridiculous. After thirteen months of project construction: grading, pile driving, the presence of up to 500 workers per day, etc., there won't be any wildlife in the vicinity that would use the barren terrain beneath three high-voltage transmission lines as a corridor nor will they utilize the project's miniscule 50 to 100-feet-wide wildlife crossing (or escape route/opening) that would funnel wildlife into the SDG&E transmission corridor.

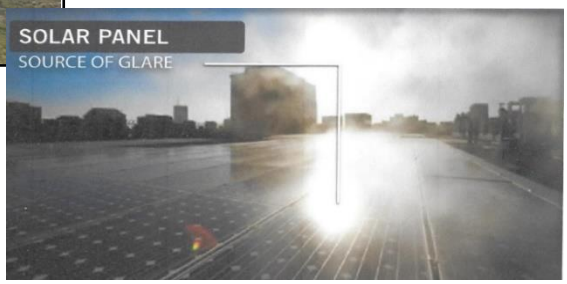
--Based on the comments of experienced glider pilots like Alasdar Mullarney, the JCSG believes that the Community Buffer Alternative even with its modified solar panel tracking to reduce glare, will still add unnecessary and dangerous elements into the airport's flight path. Also, on page 3-23 of the PC Hearing report, there is no mention of a 20 degree east facing modified wake angle for solar panels placed south of Hwy 80, as described in the FEIR. This adds confusion about the actual tracking behavior of solar panels. In any case, the JCSG requests that solar facility components are not placed south of scenic Hwy 80 and along three sides of the Jacumba airport runway to avoid adding safety issues during glider launch and landings. We further request this portion of the MUP area remain open for future community/airport expansion, and a future Port of Entry (POE) with Mexico.

--As stated elsewhere, the JCSG opposes the inclusion 8.1-acre switchyard facilities in the JVR MUP. The nearby, 58-acre SDG&E East County Electrical substation, brought online in 2015, was designed to: "Provide an interconnection hub for renewable generation that eliminates the need for multiple generator-owned or operated switching stations along SDG&E's existing SWPL 500 kV transmission line." https://www.dudek.com/ECOSUB/TuleAED/Appx_C_NOP.pdf. The JVR switchyard is unnecessary, and it adds yet another wildfire risk within Jacumba's rural village

area. The JCSG requests that the approval of any size JVR solar utility should require the undergrounding of electrical transmission lines from the collector substation to the ECO Substation. The PC Hearing report also asserts the JVR swtichyard is visually consistent in size and scale to similar uses in the surrounding area. It identifies the ECO Substation as a similar use although the ECO substaion is two miles distant and can not be seen from Jacumba. Without a visual simulation of the JVR swtichyard facilites in either the hearing report or FEIR, a sample switchyard photo is provided.

--The PC Hearing report describes the JVR project as a low-intensity type of non-residential development compatible with existing land use. This is just not true…Left is an existing view of the JVR project area as seen from state park lands. Below it, is a visual simulation of the 643-acre project before the larger setbacks along Old Highway 80 were applied. This visualization is erroneously identified in the PC Hearing report (Figure 12) as showing the 604-acre Community Buffer Alternative. (Most sane people would not describe the visual blight created by the project as a "low intensity use.")

--The Hearing Report states on page 3-26, that solar panels will be treated with an anti-reflective coating to minimize glare. The JCSG is concerned that the effectiveness of the anti-reflective coating will diminish after baking in the sun after 15 or 20 years. Therefore, the glare impact from the solar panels will increase significantly. Right is an illustration of solar panel glare taken from the 2021 glare study found in the FEIR Visual Resources report. The County should require the developer to



periodically reapply the anti-glare coating as a condition of approval of any size solar project (if feasible).

--The Hearing report and the FEIR have approached the project's projected construction and annual operational groundwater usage by requiring the monitoring of wells. Climate change impacts are reducing annual rainfall amounts and this negatively impacts the recharge of our shared local aquifers. As a result of our current severe drought conditions, the County should require all industrial solar facilities conserve their annual water usage. This could be accomplished through innovative panel cleaning techniques (dry brush systems) that use no water or 90 percent less water than traditional, noisy power washing systems pulled around the solar array field with a truck. These dry brush systems which attach directly to the solar panels are powered by the energy produced by the panels themselves. They are currently in use by the solar industry and a sponsor group should not have to point this out.

--The JCSG believes the PC Hearing report and the FEIR have chosen to minimize the findings of the limited studies conducted on the "Heat Island Effect" that pertain to large scale solar utilities. Those documents seem relatively unconcerned about the placement of hundreds of acres of super-heated solar panels adjacent to Jacumba residences. If the solar modules are 20 to 30 degrees F hotter than ambient temperatures, and the heat will not disperse until more than 1,000 feet from the heat source, then project setbacks from residences need to be increased. It is better for the County to require wider buffers then to watch as elderly and disabled Jacumba residents without air conditioning, suffer from preventable temperature increases.

--The PC Hearing report states that the Community Buffer Alternative is constant with the goals and vision statements found in the Mountain Empire Sub-regional plan. This is non-nonsensical. See excerpts from the sub-regional plan below.

> "The community supports new development that preserves the natural and historical environment, including water resources, and protects existing neighborhoods, manages growth to reinforce the rural character of the area which includes agriculture, open space, and trails..."
>
> "Provide a land use pattern that will accommodate the forecast population increase, while retaining the rural charm of the present living environment."
>
> "Single family residential development on large lots outside the rural village with undeveloped meadows, open spaces, and hillsides. The ability to experience large open spaces and views to distant hills is essential to the preservation of the areas present quality of life."
>
> "Industrial development is not compatible with the goal of maintaining the rural character of the sub-region…"

> "The Ketchum Ranch Specific Plan is a multi-use residential community with recreational and visitor-oriented commercial uses on approximately 1,300 acres that would be in harmony with the existing town, a plan sensitive in its design to the natural and historical resources of the Jacumba area."

The Community Buffer Alternative, a 604-acre solar facility with 300,000 solar modules, battery storage containers, etc., is not compatible with Jacumba's prized community character and sit vision for the future. The smaller Equity for Jacumba Alternative would strike a balance between the solar project and the future sustainability of our town.

The PC hearing report acknowledges that Community Buffer Alternative will not adequately mitigate impacts to aesthetics, visual resources, and mineral resources, so a Statement of Overriding Considerations is part of the PC Hearing Report. The sponsor group does not support the discussion contained within the Statement of Overriding Considerations that because the developer has already entered into a PPA with the SDCP, the Community Buffer Alternative, should be approved so that five urban communities can make progress toward meeting their clean energy goals. Nor does our group believe that any solar facility should be approved because "The project would enhance the County's reputation as a leader in the development and deployment of innovative energy and solar technologies." **A massive project like the JVR Community Buffer Alternative should only be approved after careful and thoughtful examination using a lens of fairness that considers the welfare of the underserved community that it will forever impact.** If the Community Buffer Alternative and the Statement of Overriding Considerations are approved, County leaders will affirm project impacts to quality of life for residents in our diverse, and economically disadvantaged community are not important because green energy is needed for affluent urban areas. Jacumbains know that a similar renewable energy project would never be approved next to a richer community where land value is at a premium.

The JCSG believes that there is a path forward for the JVR solar project if the developer is willing to compromise on siting and scale. Accordingly, the planning commission should be willing to make a politically unpopular decision and require the developer to do so. The JCSG believes our smaller Equity for Jacumba Alternative strikes a balance between the JVR project objectives and the future sustainability of Jacumba Hot Springs. We strongly urge planning commissioners to do the right thing and deny the JVR Community Buffer Alternative and the Statement of Overriding Considerations**. It is okay to extend the CEQA review process, if the end result is a planned project that is a win for both sides.**

Thank you in advance for supporting the community of Jacumba.

Sincerely,

Cherry Diefenbach

Save Our Heritage Organisation
Protecting San Diego's architectural and cultural heritage since 1969

Thursday, July 8, 2021

San Diego County Planning Commission
5520 Overland Avenue
San Diego, CA 92123

Re: July 9 Agenda, Item 3, JVR Solar (PDS2018-MUP-18-022)

Commissioners,

Save Our Heritage Organisation (SOHO) reviewed the JVR Solar project at 45346 Old Highway 80, the draft Environmental Impact Report (EIR) and Historical Resources Technical Report (HRTR). We find the HRTR deficient in its historical significance analysis for the Mountain Meadow Dairy and Creamery's Sunshine Ranch complex with regard to the County of San Diego Criteria 1, 2 and 3 and find several of these resources historically significant and eligible for designation at the local level. Therefore, SOHO recommends the Commission ask for revisions to the HRTR so the project can be adequately evaluated under the California Environmental Quality Act and significant historical resources identified, avoided, and appropriately mitigated.

Under Criterion 1, the HRTR identifies this dairy facility, totaling 750 acres, was "one of the only large dairy product organizations in San Diego's southwest region that both produced its own milk and then distributed it." The report also acknowledges the "increasing demand for dairy farms in San Diego in the 1920s," and the new option to "to establish a dairy far away from Mission Valley," but fails to identify or evaluate the development and population impact this large dairy certainly had on Jacumba, its largest local employer to date. The report additionally discusses the development of the sanitary milk bottle top in 1933, noting it was "more likely to have occurred" at the Sixth Street creamery, but no documentation or evidence is provided to support this assumption nor is there an evaluation of how this invention impacted the dairy/ranch or its association with larger changes in the dairy industry.

The HRTR also does not adequately evaluate Criterion 2, for significance of the ranch's longest-running owner and company manager, Edwin Oscar Adam. Beginning in 1918, under his leadership, the ranch reached 750 acres, was one of the only large dairy product organizations in San Diego's southwest region to produce and distribute its own milk, and one of the largest San Diego County milk producers from 1930 until 1945. Adam's tenure saw the urban creamery constructed in 1933 with various new technologies in the dairy industry, a fleet of 80 employees over two locations, two early morning deliveries, painted delivery trucks, and a 100% sanitary bottle cap that won a gold medal at the California State Fair in 1934. Known as Sunshine Ranch at the time, the dairy closed in 1945 upon Adam's retirement. A revised HRTR should evaluate Adam's impact as Jacumba's largest employer and his retirement, such as a decline in population or development due to this temporary loss of local industry.

Last, under Criterion 3, of the 14 extant resources, there are several significant historical sttructures that compose the Mountain Meadow Dairy and Creamery's Sunshine Ranch complex, which continue to retain integrity and embody distinctive characteristics of the dairy/ranch building typology during the 1918-1945 period for the San Diego County region. Although Dwellings A, B, C and D; the Milking Barn, Barns A, B, and C; Tank Room, Silos, Reservoir, Cow Pens, Office, and Weigh Station are utilitarian structures, this is irrelevant as they demonstrate the practical nature of their construction with integrity of location and setting. Further, the report states the "Silos, Reservoir, Weigh Station, Milking Barn, Tank Room, Cow Pens, Barns A, B, C and Office, Dwellings A, B and C

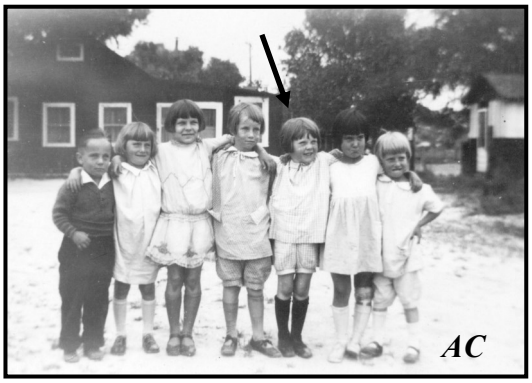
retain enough integrity to warrant listing on the NRHP, CRHP or County of San Diego Local Register of Historic Resources," (HRTR p.51). This collection of 14 existent historical resources continues to illustrate the cultural landscape and architecture of a dairy ranch by their location and proximity to each other on the ranch, circulation patterns, and the types of buildings constructed. Together, these are the distinctive characteristics of the dairy/ranch type from a 1918-1945 period of significance for the San Diego County region.

SOHO finds the Mountain Meadow Dairy and Creamery's Sunshine Ranch significant under the County of San Diego Criteria 1, 2 and 3 as a local employment center that impacted the immediate area's population and development, for an association with owner Edwin Oscar Adam, and representative of distinctive characteristics of the dairy/ranch type during1918-1945 within the San Diego County region. SOHO requests the Commission recommend revisions to the HRTR to more deeply assess the historic resources on site, which then enables the project to be adequately evaluated under the California Environmental Quality Act and ensure that these significant historical resources are identified, avoided, and appropriately mitigated.

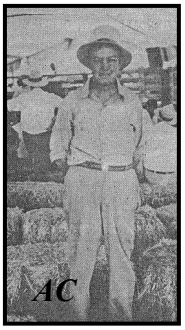
Thank you for the opportunity to comment,

Bruce Coons
Executive Director
Save Our Heritage Organisation

Edwin "Ed" Oscar Adams (1887-1958) and his wife, Margaret Victoria Taylor (1889-1939) were married in LA in 1912. Five years later, Ed was running a large wholesale produce business in El Centro. By 1918, the Adams family had moved to Jacumba where Ed was a farmer. In 1921, their daughter, Gloria Kathryn Adams was born in Los Angeles. In the c.1926 photo taken near the Crawford house in Upper Jacumba, from left to right: Carroll Bryan, Jane Boyd, Rachel Martin, Annie Bryan, Gloria Adams (see arrow), Loralie Mount, and Louise Lassar.



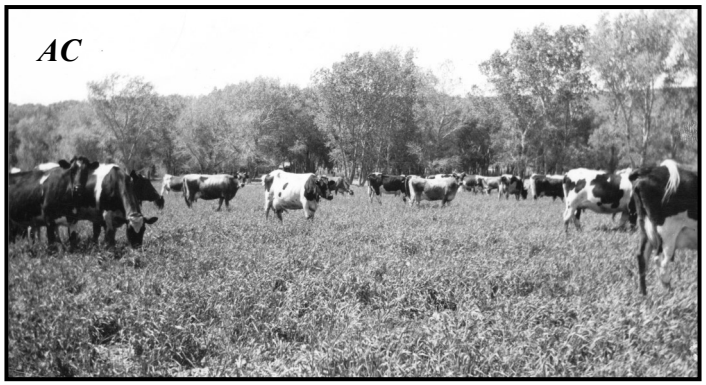
In the early 1920s, the Warrens operated a small dairy in Jacumba. See 1923 ad (left). By 1928, they sold their dairy ranch to John Hartley Taylor of the Taylor Milling company of Los Angeles. Taylor expanded dairy operations and started breeding purebred Guernsey dairy cows on his ranch now called "Jacumba Farms," a 500-cow dairy on 750 acres. Edwin Adams, Taylor's brother-in-law, was the local dairy manager. Near right is a c.1945 photo of J. Hartley Taylor (1875-1953). Far right is a c.1945 photo of Ed Adams. Below is a 1928 aerial photo which shows the Airport Inn, café, garage and service station indicated with a star and Jacumba Farm's large dairy complex indicated with an arrow.



In 1930, milk from the Jacumba Farms dairy and fourteen others was bottled by P.W. McCready and sons, under the "White Star" label at the White Star creamery in Mission Valley. White Star creamery sold and delivered 1,200-gallons of pasteurized milk and cream to all parts of San Diego County on a daily basis. See company logo (right). It also sold Mountain Meadow Ice Cream. (*SDU 6/16/1930*)

WHITE STAR DAIRY

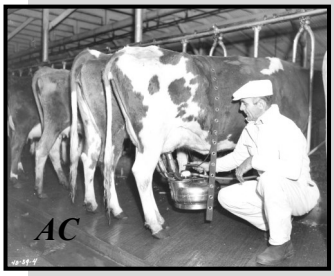
In 1930, the McCreadys and Taylor entered into a joint enterprise which exchanged the White Star Creameries' debt with the Taylor Milling Company for stock holdings in a new company called Mountain Meadows Creameries, Ltd. After J. Hartley Taylor and the McCreadys had a falling out, Taylor purchased the McCready stock shares and he became the creamery's sole shareholder. Taylor then made Ed Adams, his brother-in-law, a partner and manager of their San Diego dairy/creamery operations. Right is an embossed quart milk bottle which featured the trademark star symbol combined with the Mountain Meadows label. Below is a paper milk bottle cap seal.



By the early 1930s, the Mountain Meadow dairy was known for its modern operations.

JACUMBA DAIRY RANCH FEATURES NEW EQUIPMENT

"Snuggled in a peaceful valley high in the mountains at Jacumba Hot Springs is one of the most picturesque and interesting ranch properties in San Diego County. This 750 acre ranch originally called Jacumba Farms was started many years ago as a breeding farm for purebred dairy stock due to its altitude, climate, and inexhaustible supply of water. As the herds increased, an outlet was necessary for the milk supply and Mountain Meadow Creameries, Ltd., was formed…



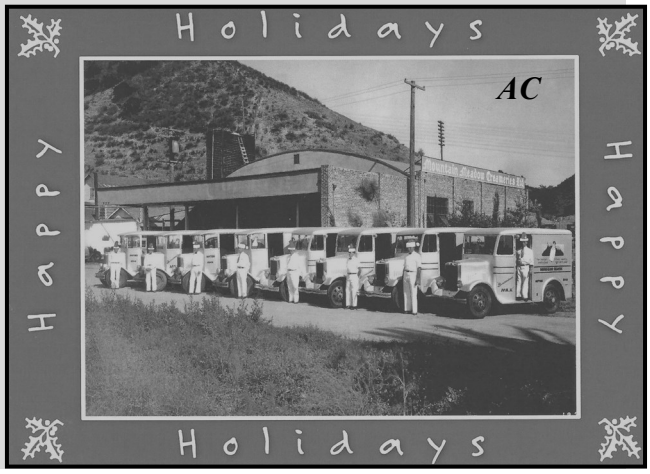
At the Mountain Meadow Ranch, more than 500-purebred Guernsey and Holstein dairy cows are kept and their milk is brought to the local plant every night by truck for distribution. The dairy ranch has a new 60-cow modern concrete milking barn, refrigeration equipment, a power plant, bottling works, and creamery. Raw milk is bottled there.

Scientific feeding to assure the finest milk flavor and high production is practiced. Grain is brought in carload quantities and mixed fresh daily to provide the proper balanced ration. The menu is changed according to the season. Every feature of sanitation is rigidly maintained…

A modern creamery was completed less than six months ago at the Sixth Avenue property where the most advanced equipment for pasteurization, cooling, and bottling under sanitary conditions is used…Mountain Meadow Creameries recently made a large investment to secure the exclusive San Diego use of the Dacro patented milk bottle and the Dacro sanitary metal cap seal… The firm maintains a fleet of attractive delivery trucks with a two-shift service that assures prompt delivery…An average of 65 employees are on the payroll."

SDU 2/5/1933

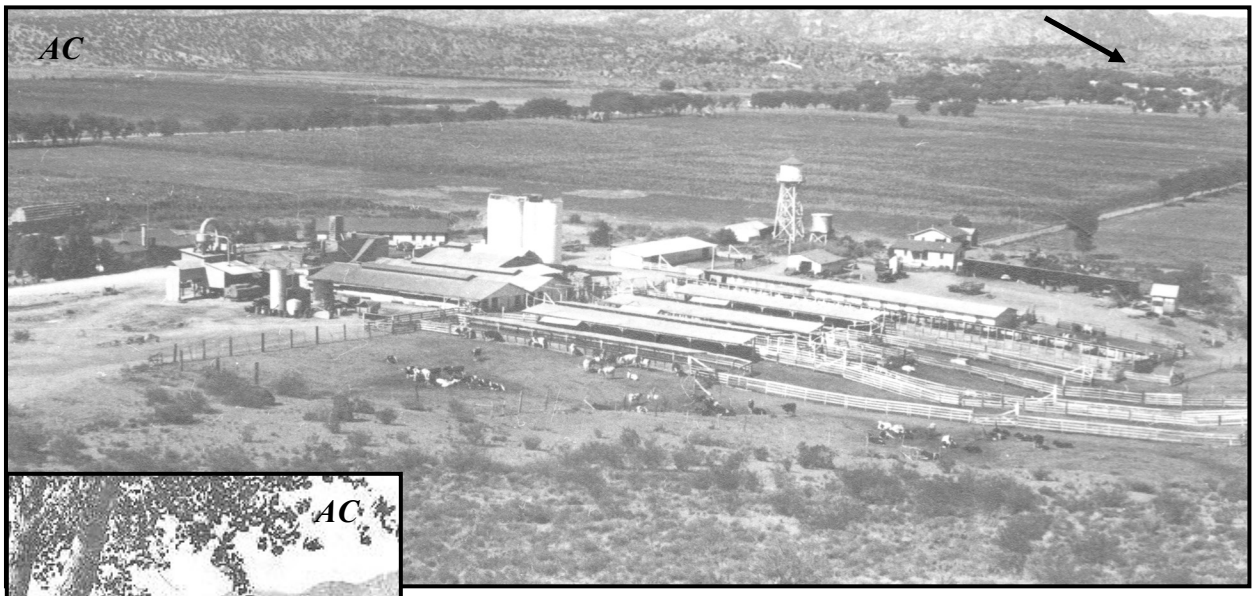
(Right is a c.1935 Christmas card showing the company's fleet of vehicles at their Mission Valley creamery. Their delivery drivers are wearing Santa hats.)

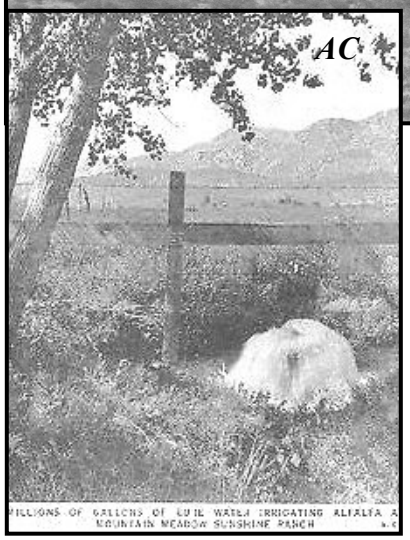


From 1932 until the mid-1940s, Ed Adams was the manager of the Mountain Meadow Creamery in San Diego. J.H. Wist, was the early manager at the Mountain Meadow Dairy operations in Jacumba. The dairy's nearness to the SD&A railway was very beneficial as carloads of Guernsey heifers were shipped from Oregon to Jacumba and much of the feed eaten by the dairy herd also came by rail. (*SDU 7/31/1932*)

In 1933, following a surprise visit by the county health department, Mountain Meadow Creameries, Ltd. received the highest score of any brand of grade "A" raw milk produced in the county. (*SDU 3/19/1933*) The creamery, which included a laboratory, bottling works, pasteurizing vats, received a daily shipment of 6,000 pounds of milk via tankers from the "Sunshine Ranch" at Jacumba. "The San Diego creamery delivers hermetically-sealed bottles of milk to homes twice every day, before 6 am and after 8 pm. It also has three trucks to meet the demands of the wholesale trade" (*SDU 3/26/1934*). In 1933, a quart of their milk sold in stores for just 11 cents.

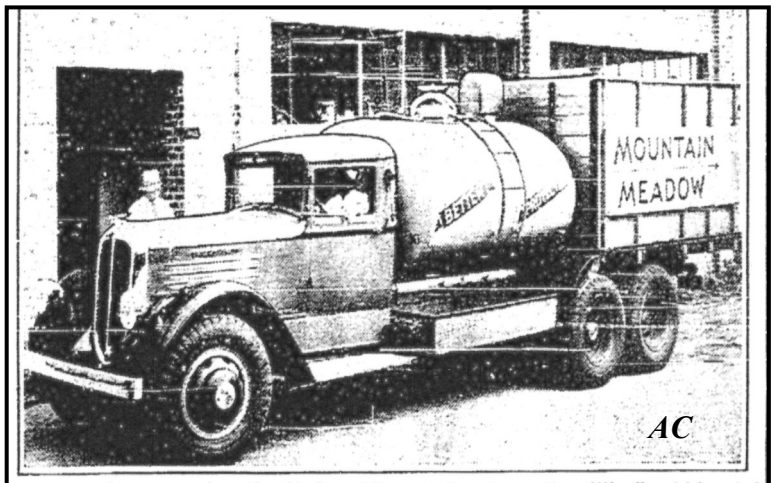
Below is a c.1934 photo of the Mountain Meadow Dairy complex showing large barns and grain silos. The arrow indicates the town of Jacumba. In 1934, the ranch was described as having 30-40 employees who were responsible for the operation of the dairy and maintenance of crop fields. (*SDU 4/9/1934*)





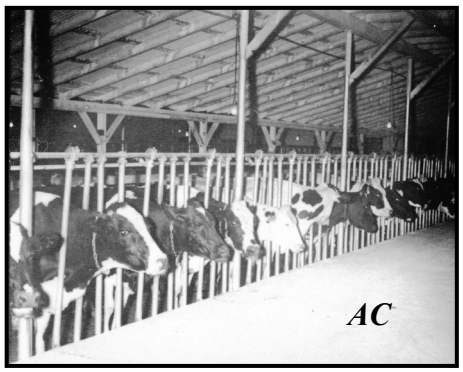
In the mid-1930s, several newspaper articles extolled the superior flavor of the Mountain Meadow dairy products. According to E.O. Adams, general manager of the creameries, the flavor of the milk was directly attributed to the use of scientific feeding, an abundance of pure, mountain-fresh water, and selective breeding of the dairy herds. (*SDU 8/27/1934*) The milk also won several awards for its excellent taste at the California State and Los Angeles County fairs. (*SDU 10/1/1934*) Left is a c.1940 postcard showing an overflowing irrigation well at the Sunshine Ranch in Jacumba.

In 1935, the creamery had a modernized fleet of tankers. See photo of a "modern" tanker outside the dairy office at the Mountain Meadow Ranch (right).

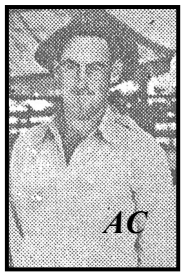


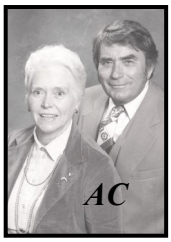
Mountain Meadow creamery has added this General Motors truck equipped with an 1100-gallon stainless steel lined, cork insulated thermos tank to its fleet, for carrying milk from its Jacumba ranch to San Diego in three hours. Milk is maintained at even temperature and is unloaded by forced air pressure. The firm also has added Divco enclosed type milk uelivery trucks.

By 1938, the dairy herd at Ed O. Adams' Mountain Meadow ranch near Jacumba had grown to 1,000 animals and mechanical milk maids were used to milk the dairy cows. (*SDU 9/11/1938*) See c.1940 photos of cows in the milking barn (below) and a milk truck outside the Mountain Meadow office at Jacumba (right).



In July 1945, a huge auction was held at the Mountain Meadow Ranch in Jacumba. Over $102,000 cash was realized from the sale of milking equipment, 40 trucks, as well as 632 cows, heifers, and bulls. The top bull sold for a whopping $1,000. After a successful San Ysidro dairyman, named Louie Serrano, bought some of the cows at auction, he also leased the Mountain Meadow Ranch and continued dairy operations. Clayton Hopkins, the herd foreman for Mountain Meadow Ranch, stayed on at the dairy. See 1945 photo of Hopkins (right). Earlier in May, the Challenge Cream and Butter Association of Los Angeles bought the Mountain Meadow Creamery at the foot of Sixth St. in San Diego. It would continue to operate the plant and make milk deliveries. (*Southern California Rancher, July 1945*) With the sale of the creamery, E.O. Adams concluded his 16-year management of the Mountain Meadow Creamery. Ed Adams continued to live on his farm in Jacumba with his second wife, Ruth. In 1958, E.O. Adams (71) passed away in San Diego.

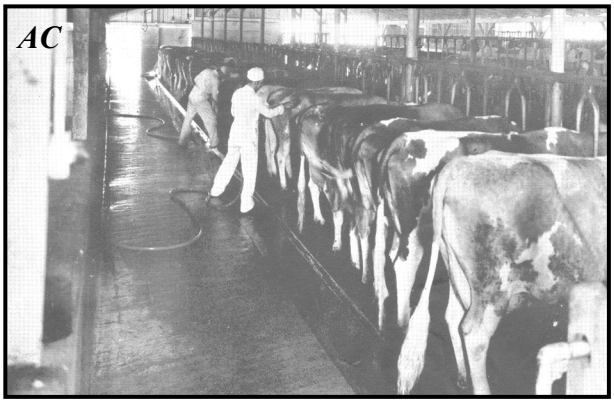


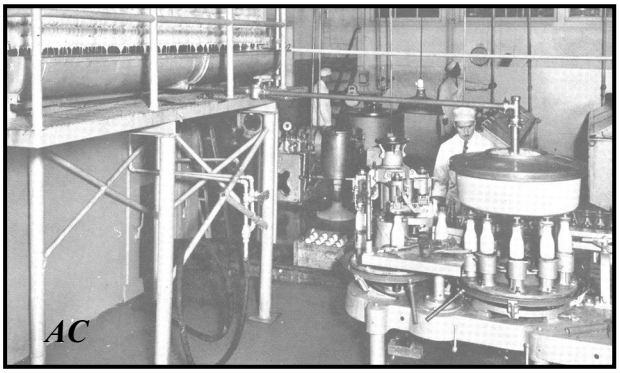


In 1945, Navy Lt. William Wallace "Bill" Ketchum (1919-2012) met Gloria Adams in San Diego. See c.1979 photo of them (left). After their marriage in 1946, they moved to Jacumba where they lived on a farm located on the south side of Old Highway 80. See cultivated fields and the farm house indicated with an arrow on the 1952 aerial photo.

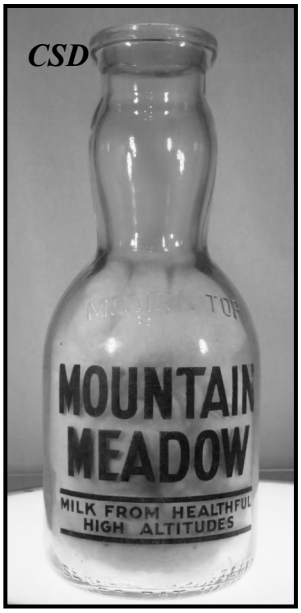
When Louie Serrano's lease on the Mountain Meadow Dairy ended in 1950, the Ketchums took over the dairy. They moved into a residence next to the dairy where they raised four children: Suzi, Bill, John, and David. See 2012 photo of their former residence which is currently boarded up and abandoned.

The Ketchums employed about 50 Jacumba locals at their labor intensive dairy. Their large dairy herd was milked twice a day, at midnight and again at noon. They also pasteurized and bottled milk in quart, pint, and half-pint bottles under the Mountain Meadow label. See c.1950 photos of quart bottling process and two quart bottles (below).

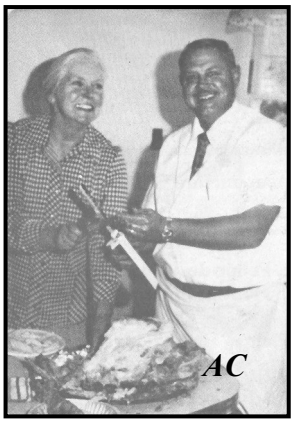




From about 1957 to 1962, the Jacumba dairy was leased to Sam Kroons and his wife. The Kroons were the last operators of the Jacumba dairy.



Over time, the former Mountain Meadow Ranch became known as the Ketchum Ranch and it included about 1,800 acres. The Ketchums grew hay, lettuce, melons, squash, and potatoes, etc. Bill and Gloria Ketchum became pillars of Jacumba; Bill served on a local school board for many years and Gloria was active in the United Methodist Church. See 1974 photo of Gloria with the Dr. Jordan Detzer, the church's pastor (left). Bill Ketchum also operated a Napa Auto Parts business on the Ketchum Ranch from the late 1960s to the early 1980s.



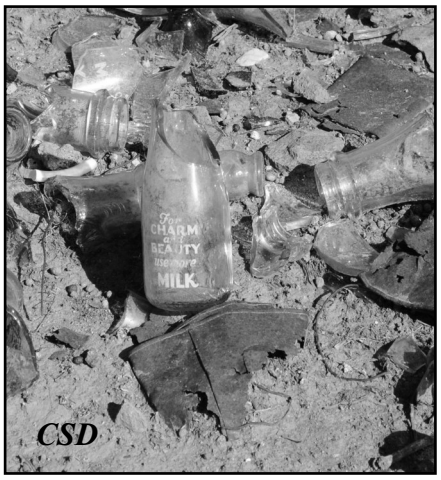
In the mid-1970s, the Ketchums sold 500 plus acres north of Round Mountain to Don Liponi, Sr. and Joe Francis. (The two men would open a large recreational vehicle park called De Anza Springs R.V. Park adjacent to Anza Borrego Desert State Park.)

After Gloria Ketchum passed away in 1982, Bill married Marjorie Baker and they continued to live in Jacumba. About 1992, the Ketchums left Jacumba after selling nearly 1,400 acres of their former ranch land to a developer. Called the Jacumba Valley Ranch project, a development partnership submitted a major use permit to build about 1,000 residential homes, an equestrian center, a 90-bed senior citizen facility, an 18-hole "championship" golf course and clubhouse, a 200-room resort hotel, and a wastewater treatment facility. The large project won the approval of the local Jacumba Sponsor Group. In 1999, pending approval by County officials, the developer leased 450 acres to Bornt Farms of Holtville, CA who raised organic spinach, spring mix, and baby lettuce near the east end of town. After just a few years, the continuously moist soil began to produce a large and extremely annoying crop of eye gnats that were an unrelenting nuisance to locals and their pets. (Female gnats swarm around human and animal eyes to obtain a protein from the mucus that is needed to produce their eggs.) See c.2008 photos of gnats around the eye of a dog and acres of organic spinach growing in Jacumba Valley.

In 2003, county supervisors formally voted to reject the entire Jacumba Valley Ranch project as it was $26,000 in arrears for development review fees and it had failed to submit an environmental impact review (EIR). Four years later, an even larger housing development project called "Ketchum Ranch" was being planned by another developer, SunCal Cos. of Irvine, CA. Given the scale of that proposed project (2,125-units), many Jacumba residents voiced serious concerns about its impact on community character, traffic, and groundwater resources. This project was also never approved by county supervisors.

Meanwhile, the eye gnats breeding on Bornt's organic farm continued to plague Jacumba residents. In 2009, after it was determined that more than 80 million gnats were coming from the organic farm, Bornt Farms put up 5-foot-high cloth barriers and installed 1,200 gnat traps in an effort to mitigate the gnat problem. (*SDU 1/20/2010*) However, it was not until 2012, when a lack of irrigation water ended the farm operations, that Jacumba's eye gnat issue was finally resolved.

Later, part of the former Ketchum Ranch was used for commercial sand and rock mining. Today, the historic Mountain Meadow Dairy/Ketchum Ranch seems frozen in time with dilapidated barns and residences. In 2020, as golden eagles soar gracefully above empty grain silos and piles of broken milk bottles, the current property owners have applied for a permit to build a nearly 700 acre industrial-size solar farm. If this monstrosity is approved, it would forever scar the natural landscape, obliterate scenic views of Jacumba valley, and further depress business and residential property values.



International Association of

Bridge, Structural, Ornamental and Reinforcing Iron Workers

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July 8, 2021

San Diego County Planning Commission
c/o County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123

RE: Support for the Jacumba Valley Ranch Energy Park — JVR Solar — PDS2018-MUP-20-008 (Agenda Item 3)

Dear Chair Edwards and Commissioners:

Ironworkers Local 229 and the thousands of working families we represent in San Diego County urge your support for the Jacumba Valley Ranch Energy Park proposal.

The JVR Energy Park project is a critical part of the renewable energy portfolio that will deliver on the promise of San Diego Community Power: clean, locally generated power with economic developments for our region. During construction, the project will employ 350 skilled and trained workers, and when complete will power 52,000 homes in the region with emission-free energy.

Project applicant BayWa r.e. is using less than half the total project acreage to carefully protect area wildlife habitat. They also reduced the project scale significantly to add land buffers between project elements and residents and businesses in Jacumba.

San Diego cannot reach its ambitious climate-action goals without thoughtfully designed projects like the JVR Energy Park in our backcountry and deserts. Please vote to support clean energy and quality jobs for county residents.

Sincerely,

Beau Coleman
Business Manager
Ironworkers Local 229