

From: [Flannery, Kathleen](#)
To: [Slovick, Mark](#); [Smith, Ashley](#); [Brown, Bronwyn](#); [Koutoufidis, Nicholas](#)
Subject: FW: Late Correspondence from CPG/CSG
Date: Thursday, July 08, 2021 4:55:17 PM
Attachments: [Jacumba solar Billie Jo Jannen.pdf](#)
[renegades extracts for jvr comments ltr.pdf](#)
[JCSG pc hearing report comments.pdf](#)

I think we'll be spending most of our time answering questions related to the third document from JCSG tomorrow. Exciting times!

From: Jimenez, Ann <Ann.Jimenez@sdcounty.ca.gov>
Sent: Thursday, July 08, 2021 4:15 PM
Subject: Late Correspondence from CPG/CSG

Hello Commissioners,

Attached please find the three letters we received from the Jacumba CSG and Campo Lake Morena CPG late this afternoon regarding item 3 JVR Solar.

See everyone tomorrow!

Thank you,

Ann Jimenez | She-Her-Hers
Planning Commission Secretary
County of San Diego, Planning & Development Services
5510 Overland Avenue, Suite 310 San Diego, CA 92123
C: (619) 517-4193

Please note: I will be teleworking M/Tu/Th and in-office on W/F.
I am accessible by e-mail, cell phone. In-person, and MS Teams.
My work hours are 7am-3:30pm M-F.

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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 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 CO₂." <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."

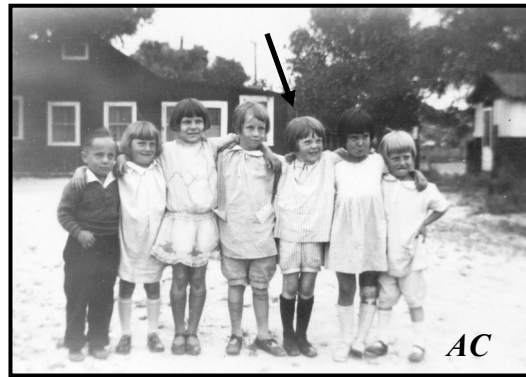
Please stop allowing solar and wind developers to get away with sloppy, minimal evaluations of these important considerations. Please stop approving these developments just to measure up to arbitrarily set goals or partisan ideas about climate change and the environment. Satisfying some standard set 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

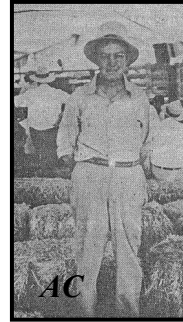


Billie Jo Jannen
619-415-6298

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.



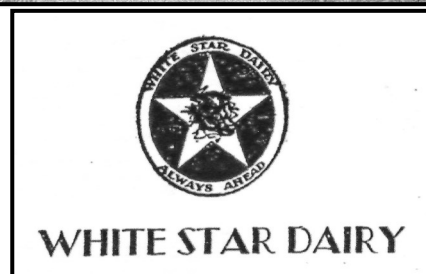
In the early 1920s, the Warrens operated a small dairy in Jacumba. See 1923 ad (left). By 1928, they sold their dairy ranch to John Hartley Taylor of the Taylor Milling company of Los Angeles. Taylor expanded dairy operations and started breeding purebred Guernsey dairy cows on his ranch now called “Jacumba 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.



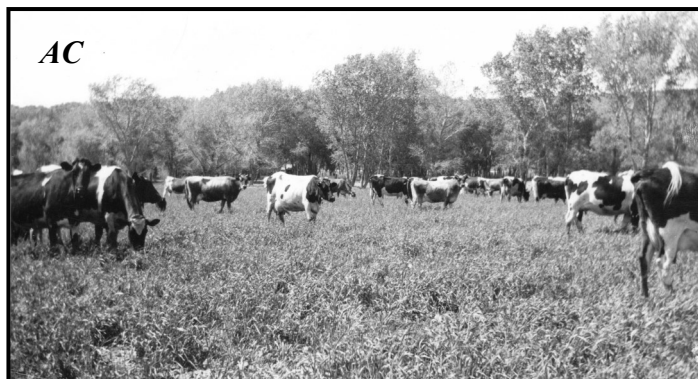
Below is a 1928 aerial photo which shows the Airport Inn, café, garage and service station indicated with a star and Jacumba Farm’s large dairy complex indicated with an arrow.



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)



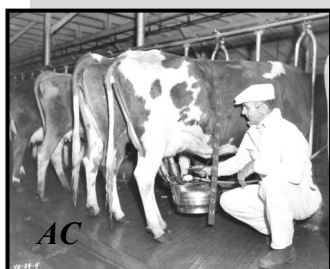
In 1930, the McCreadys and Taylor entered into a joint enterprise which exchanged the White Star Creameries' debt with the Taylor Milling Company for stock holdings in a new company called Mountain Meadows Creameries, Ltd. After J. Hartley Taylor and the McCreadys had a falling out, Taylor purchased 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..."



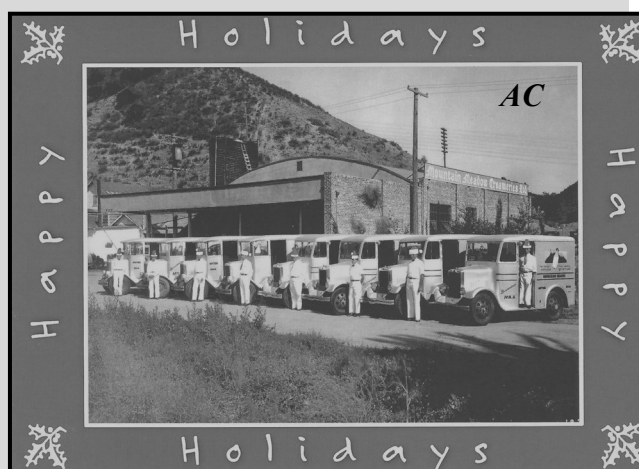
At the Mountain Meadow Ranch, more than 500-purebred Guernsey and Holstein dairy cows are kept and their milk is brought to the local plant every night by truck for distribution. The dairy ranch has a new 60-cow modern concrete milking barn, refrigeration equipment, a power plant, bottling works, and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

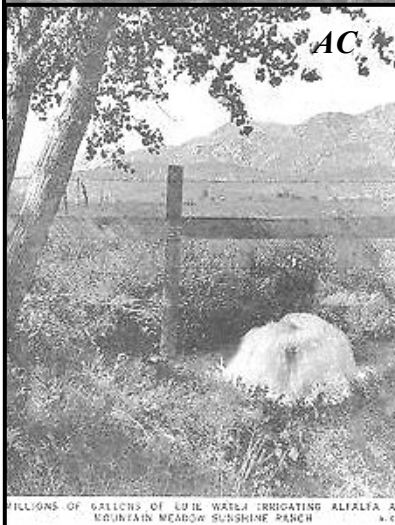
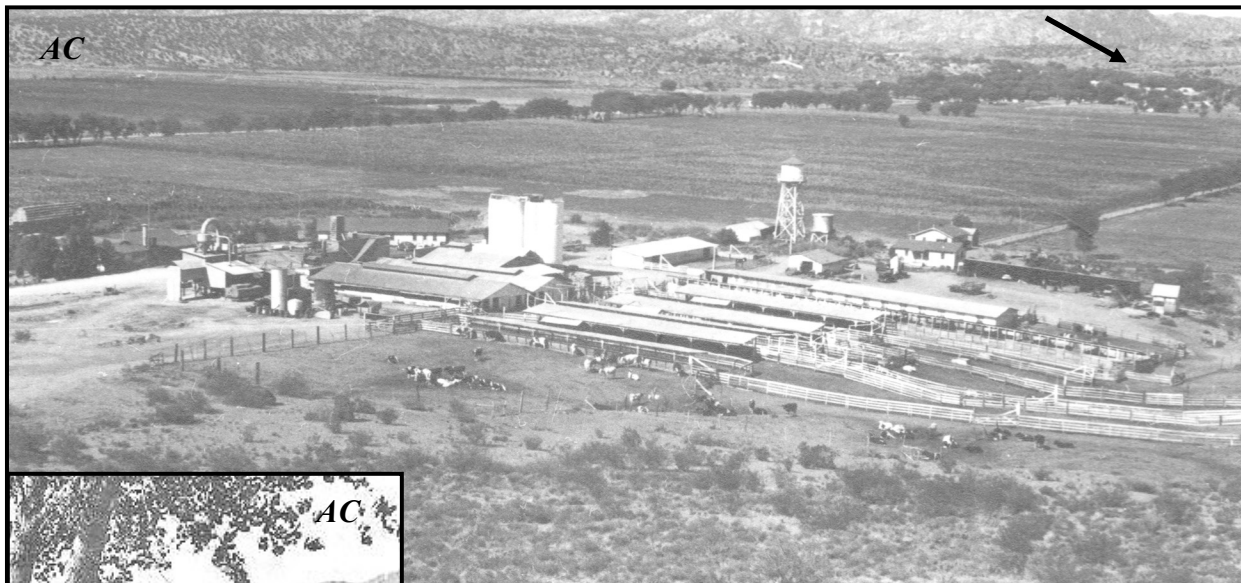


From 1932 until the mid-1940s, Ed Adams was the manager of the Mountain Meadow Creamery in San Diego. J.H. Wist, was the early manager at the Mountain Meadow Dairy operations in Jacumba. The dairy's nearness to the SD&A railway was very beneficial as carloads of Guernsey heifers were shipped from Oregon 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.



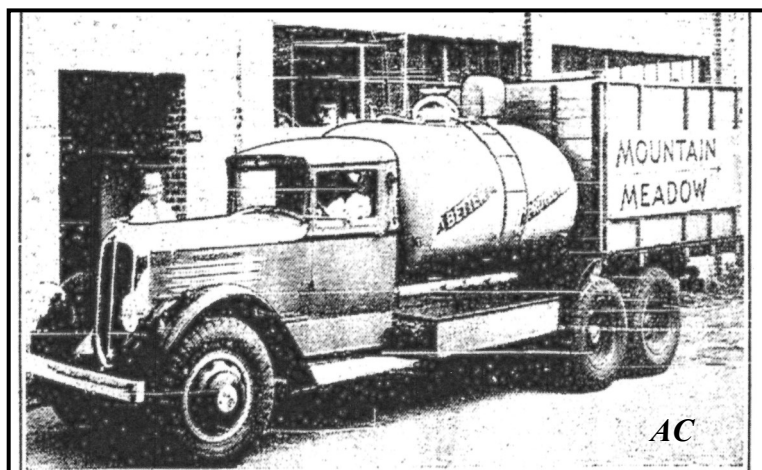
Below is a c.1934 photo of the Mountain Meadow Dairy complex showing large barns and grain silos. The arrow indicates the town of Jacumba. In 1934, the ranch was described as having 30-40 employees who were responsible for the operation of the dairy and maintenance of crop fields. (SDU 4/9/1934)



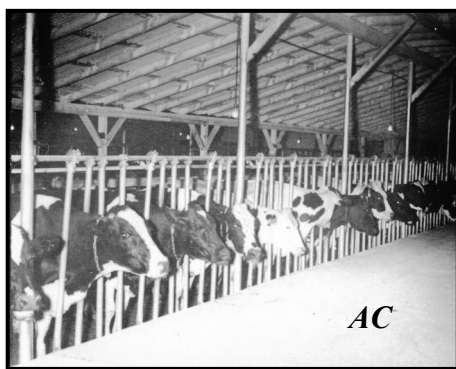
In the mid-1930s, several newspaper articles extolled the superior flavor of the Mountain Meadow dairy products. According to E.O. Adams, general manager of the creameries, the flavor of the milk was directly attributed to the use of scientific feeding, an abundance of pure, mountain-fresh water, and 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).

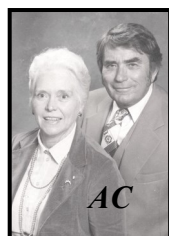
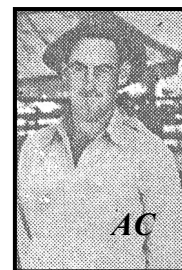
By 1938, the dairy herd at Ed O. Adams’ Mountain Meadow ranch near Jacumba had grown to 1,000 animals and mechanical milk maids were used to milk the dairy cows. (SDU 9/11/1938) See c.1940 photos of cows in the milking barn (below) and a milk truck outside the Mountain Meadow office at Jacumba (right).



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 Divo enclosed type milk delivery trucks.



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.



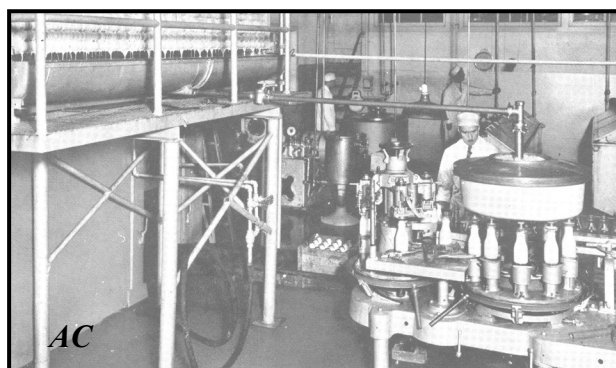
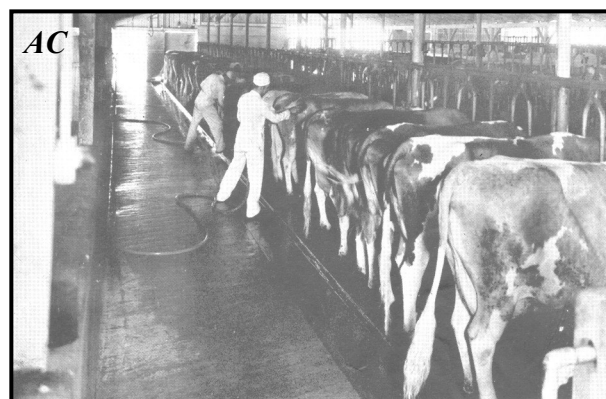
In 1945, Navy Lt. William Wallace “Bill” Ketchum (1919-2012) met Gloria Adams in San Diego. See c.1979 photo of them (left). After their marriage in 1946, they moved to Jacumba

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).



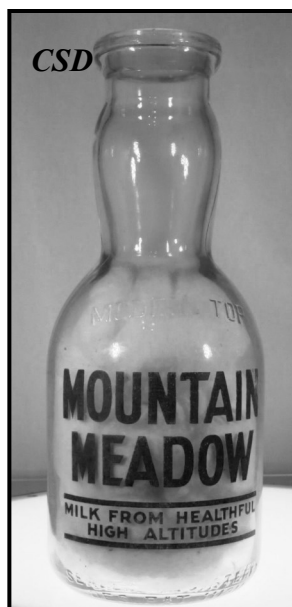
From about 1957 to 1962, the Jacumba dairy was leased to Sam Kroons and his wife. The Kroons were the last operators of the Jacumba dairy.

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.

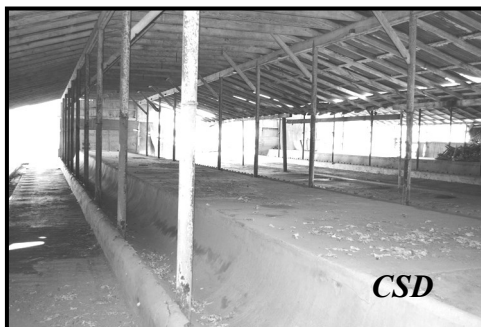


In 2003, county supervisors formally voted to reject the entire Jacumba Valley Ranch project as it was \$26,000 in arrears for development review fees and it had failed to submit an environmental impact review (EIR). Four years later, an even larger housing development project called “Ketchum Ranch” 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.

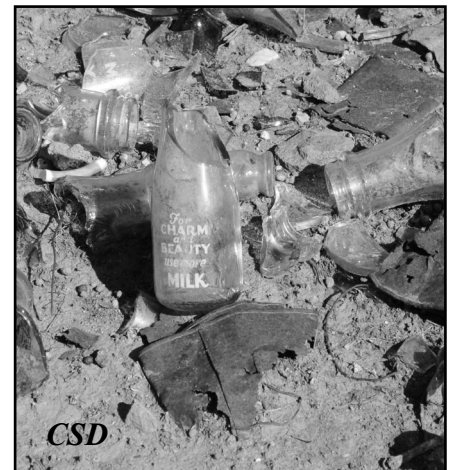


Meanwhile, the eye gnats breeding on Bornt’s organic farm continued to plague Jacumba residents. In 2009, after it was determined that more than 80 million gnats were coming from the organic farm, Bornt Farms put up 5-foot-high cloth barriers and installed 1,200 gnat traps in an effort to mitigate the 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.



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.

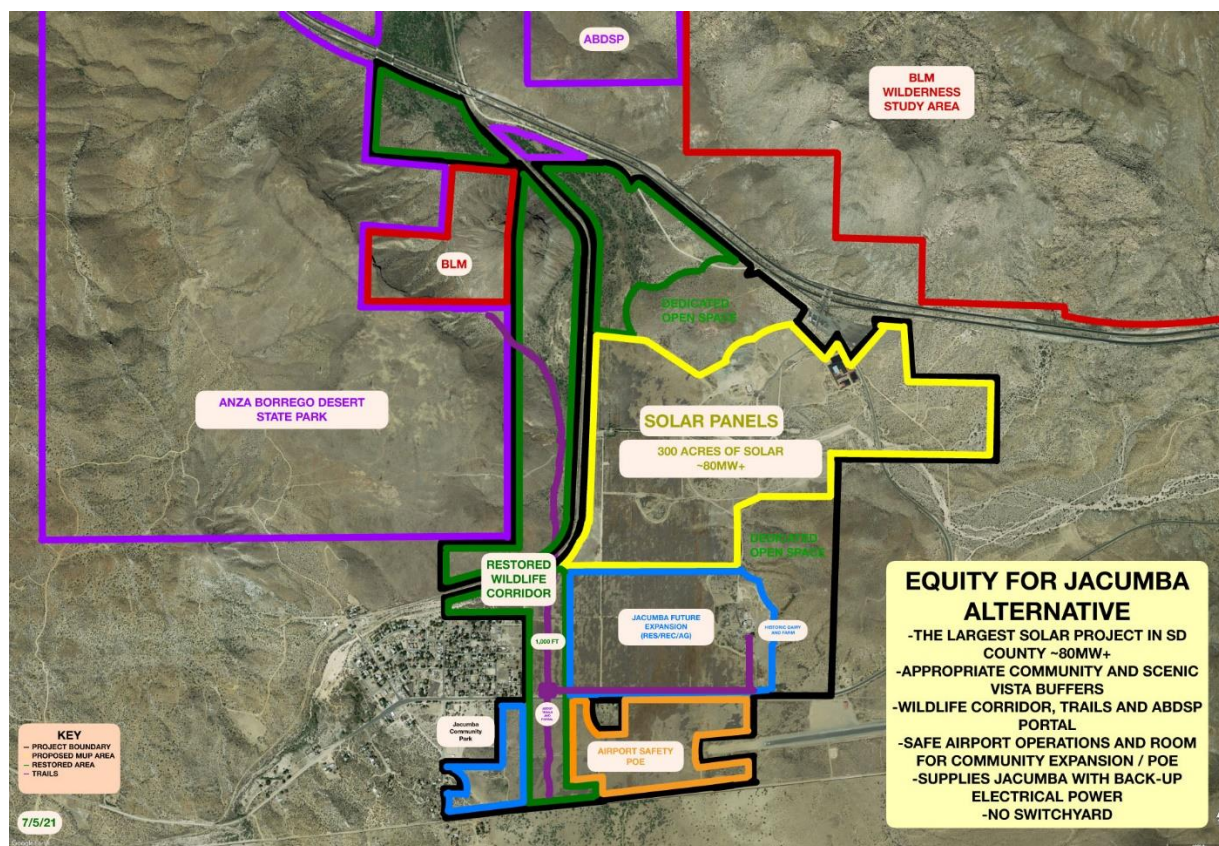
- A direct power connection from the JVR solar facility that would provide back-up power to Jacumba when SDG&E secures our power during Red Flag warnings.

- 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 runway 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-foot 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-foot 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 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 be 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 Alternative 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 *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 "18 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-foot-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 switchyard 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 substation is two miles distant and can not be seen from Jacumba. Without a visual simulation of the JVR switchyard facilities 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

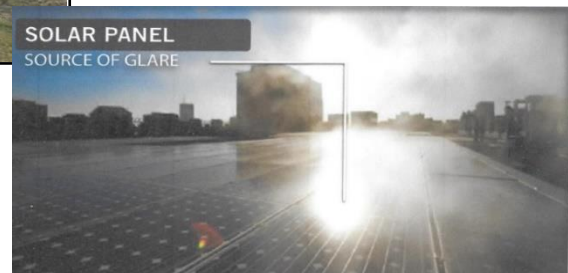


643-acre project before the larger setbacks along Old Highway 80 were applied. This visualization is erroneously identified in the PC Hearing report (Figure 12) as showing the 604-acre Community Buffer Alternative. (Most sane people would not describe the visual blight created by the project as a "low 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 than 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 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