

**ATTACHMENT**

**For Item**

**#01**

**Wednesday, August 18, 2021**

**PUBLIC COMMUNICATION RECEIVED BY THE  
CLERK OF THE BOARD**

**DISTRIBUTED: 8/11/2021**



August 5, 2021

Honorable Joel Anderson  
Subject: JVR Project- Jacumba Springs

The Borrego Village Association (BVA) is headquartered in Borrego Springs California. The BVA pursues a community vision where the private, public, and non-profit sectors partner to build a sustainable and economically healthy Borrego. Recognizing tourism as our primary economic driver, the BVA works to enrich the visitor experience while promoting and protecting the unique recreational, natural, architectural, and cultural resources which attract them. The BVA supports the premise that professionally-managed tourism can 'lift all boats' through economic growth, workforce development, and resource stewardship.

We recognize the importance of renewable energy development in San Diego County. We also recognize the difficult path that face many small rural communities in pursuing viable economic growth. Accordingly, when tourism is the primary driver, scenic, recreational, and biological resources should be managed and protected as economic assets, and not be unnecessarily sacrificed.

The Board of Supervisors should be sensitive to the economic future of this small, picturesque community. Due to its location, Jacumba will bear more than a proportional burden for county energy infrastructure, infrastructure which will benefit all San Diegans. Hopefully you will continue to carefully consider every opportunity to reduce the negative impacts of this project and ensure that this small East County community retains a reasonable chance to pursue its own unique version of economic success in the coming years.

Sincerely,

Dick Troy, President  
Borrego Village Association

Jim Wermers, Vice President  
Dr. J. David Garmon, Vice President  
Dave Duncan, Treasurer  
Diane Johnson, Secretary

[BorregoVillage@gmail.com](mailto:BorregoVillage@gmail.com)  
[BorregoExperience.com](http://BorregoExperience.com)  
[BorregoVillageAssociation.org](http://BorregoVillageAssociation.org)

---

**From:** Ian Abramson <ianabramson@gmail.com>  
**Sent:** Monday, August 9, 2021 3:00 PM  
**To:** Anderson, Joel  
**Cc:** Vargas, Nora; Flores, David; Kazmer, Gregory; Lawson-Remer, Terra; Andrade, Evelyn; Petterson, Cody; Fletcher, Nathan (BOS); Wier, Emily; Desmond, Jim; Mills, Benjamin; FGG, Public Comment; Slovic, Mark  
**Subject:** [External] JVR Energy Park Project (PDS2018-MUP-18-022); public hearing on August 18  
**Attachments:** solar project jacumba.docx

Ian Abramson  
3861 Pringle St., San Diego, CA 92103.

August 9<sup>th</sup>, 2021.

Supervisors Joel Anderson, District 2,  
Nora Vargas, District 1,  
Terra Lawson-Remer, District 3,  
Nathan Fletcher, District 4,  
Jim Desmond, District 5, - and all their land-use advisors.

Dear Supervisors Anderson, Vargas, Lawson-Remer, Fletcher, Desmond, and their Land Use Advisors –

**Re: JVR Energy Park Project (PDS2018-MUP-18-022), and the coming public hearing on August 18<sup>th</sup>.**

A little background: I am a retired UC San Diego faculty member, living in San Diego. I have some land in the Boulevard district, about five miles from the planned solar project, but not in direct viewing distance of it. I hope this distance gives me standing to comment, but also some immunity from charges of pure NIMBYism where I express my concerns about the project.

The far southeast county, including the In-Ko-Pah and Jacumba Mountains (with Carrizo Gorge between), along with the escarpment down to the Imperial Valley, is a region of exceptional scenic beauty of a rare kind. Unlike the greener postcard-quality beauty of the wooded lands further west, the terrain has a more rugged and austere majesty. It is a narrow transitional zone of high-desert chaparral, with extraordinarily diverse but fragile plant communities giving texture to a fantastic exposed geology of granite boulders and quartzitic and basaltic outcroppings such as Table Mountain just to the north of the planned project, on the border of the Anza-Borrego State Park. The region is sometimes compared to parts of Joshua Tree National Park. Stand on the ridge on the west side of Jacumba Hot Springs (whimsically called Snob Hill, to the annoyance of its residents), and the view east is stunning. Across a great plain extending far south into Mexico loom a low range and then the Jacumba Mountains dominated by Blue Angel Peak. The view west

from the hill behind the disused airport, where there are abandoned houses, is equally breathtaking. To the north lie Round Mountain and the Table Mountain of legend with its worked-out mines and at least two species of threatened dudleya, including the rare, tiny *Dudleya abramsii*. The plain is bounded by distant hills to the south, but heading north it drains around a gap on the east side of Round Mountain to the beginning of the Carrizo Gorge, before the plunge to the low desert. Up here it has its own distinct plant community due to the high water table, supporting dense willow and two species of mesquite: honey mesquite, *Prosopis glandulosa* and the rarer screwbean, *P. pubescens*. I have encountered a mountain lion at short range in that zone. All these vistas would be tragically marred if the full 600+acre solar project went ahead.

Perhaps none of this would matter as much if Jacumba were destined to be stuck in its economic doldrums forever. It is not. A hundred years ago the hot springs and a grand multistory stone-fronted hotel made it a nationally known playground for the rich and famous. Outlying satellite towns, now ghost towns like Bankhead Springs, sprang up to accommodate the overflow of the rich-adjacent and famous-adjacent who couldn't quite make it into the main hotel. Then a double-whammy in the 70s: Interstate 8 bypassed the town, replacing Old Highway 80, which had passed through, and the hotel burned down, leaving the town in a slump that's persisted until now. But there are signs of life. The Spa has been bought and is being refurbished. People with some capital and vision have seen potential. A year ago Jacumba Lake was a foul-smelling, tamarisk-choked bog. After repairing a dam at some serious expense and a heroic community cleanup it is once again a big sparkling lake fringed with willow and San Diego sedge, with powerful jets of spring water feeding it, one hot and one cold, and swimmers and blanket-covered beaches and boats and children yelling. The De Anza Resort, on the other side of Round Mountain has also been bought, with plans afoot to spiff it up. There is finally buzz about the land market in the region. And even more anxious buzz about killing the goose that lays the golden egg, because people know that these prospects are fragile and much dependent on the physical beauty of the region.

Land around Jacumba is some of the most undervalued residential land in the county. It looks as if it's set for a boom – with the obvious accompanying boost to the tax base - which could equally easily be snuffed out by a reckless, irreversible assault on the obvious charm of the place. There is no reason why Jacumba might also not undergo significant expansion, with building for residential and other land uses - as long as it remains attractive. There is so much visually degraded land to our east, less desirable for residential use, on the Imperial Valley floor. Why choose a place of such special value and with so much other potential, for a utility project like this?

That all said, there is some agreement in the community that the solar field should not be opposed in its entirety at this point. Green sentiments are generally strong; mine certainly are. Everyone is clear-eyed about the moral conflict in NIMBYism, and most of us concede that the forces behind the project have a case with influential backing. But we are already host to a lot of unsightly infrastructure: 108 acres under solar panels, 58 acres under the ECO substation, two Powerlinks, a 148kV line through town and beyond. Enough, surely. We're hoping for a compromise this time on the grounds that this patch of land is of exceptional and fragile value. A competing map has been submitted that would confine the field to a less conspicuous 300 acres to the northeast of town, leaving the viewshed from well north of Old Highway 80, and down to the border, more or less unaltered. The landscaping mitigations that have been offered by the developers to soften the view are band aids - perfunctory and useless in making up for what would be lost by their full 600-acre plan.

I'll end on a note of mild indignation, intending no disrespect. The southeast county is a poor region, thinly populated, but by a surprisingly close-knit community that loves this hardscrabble place and generally gets along with some humor. There is no economy out here to speak of, and there's a general weary sense of having no political clout. There is one sad recurring phrase that one hears whenever the topic of county governance comes up: that phrase is "dumping ground", as in "We are the dumping ground of the county." I could add a litany of detail on this (and the old-timers could add more), but simply there's a sense that the land-use and life-quality interests of the region are consistently overridden whenever there's a trade-off to be made against the interests of other parts of the county, or whenever it's the path of least resistance. Because indeed we can't offer much of that. We ask that the Board consider in good faith our request for a substantially curtailed project, or, at the least, give a delay, so that we can make our strong case stronger - on environmental-impact and other grounds. Thank you.

Sincerely -

- Ian Abramson

CC: Mark Slovick, Deputy Director, Planning and Development Services, Andrew Potter, Clerk of the Board of Supervisors

[attachment]

Ian Abramson

3861 Pringle St., San Diego, CA 92103.

August 9<sup>th</sup>, 2021.

Supervisors Joel Anderson, District 2,  
Nora Vargas, District 1,  
Terra Lawson-Remer, District 3,  
Nathan Fletcher, District 4,  
Jim Desmond, District 5, - and all their land-use advisors.

Dear Supervisors Anderson, Vargas, Lawson-Remer, Fletcher, Desmond, and their Land Use Advisors –

**Re: JVR Energy Park Project (PDS2018-MUP-18-022), and the coming public hearing on August 18<sup>th</sup>.**

A little background: I am a retired UC San Diego faculty member, living in San Diego. I have some land in the Boulevard district, about five miles from the planned solar project, but not in direct viewing distance of it. I hope this distance gives me standing to comment, but also some immunity from charges of pure NIMBYism where I express my concerns about the project.

The far southeast county, including the In-Ko-Pah and Jacumba Mountains (with Carrizo Gorge between), along with the escarpment down to the Imperial Valley, is a region of exceptional scenic beauty of a rare kind. Unlike the greener postcard-quality beauty of the wooded lands further west, the terrain has a more rugged and austere majesty. It is a narrow transitional zone of high-desert chaparral, with extraordinarily diverse but fragile plant communities giving texture to a fantastic exposed geology of granite boulders and quartzitic and basaltic outcroppings such as Table Mountain just to the north of the planned project, on the border of the Anza-Borrego State Park. The region is sometimes compared to parts of Joshua Tree National Park. Stand on the ridge on the west side of Jacumba Hot Springs (whimsically called Snob Hill, to the annoyance of its residents), and the view east is stunning. Across a great plain extending far south into Mexico loom a low range and then the Jacumba Mountains dominated by Blue Angel Peak. The view west from the hill behind the disused airport, where there are abandoned houses, is equally breathtaking. To the north lie Round Mountain and the Table Mountain of legend with its worked-out mines and at least two species of threatened dudleya, including the rare, tiny *Dudleya abramsii*. The plain is bounded by distant hills to the south, but heading north

it drains around a gap on the east side of Round Mountain to the beginning of the Carrizo Gorge, before the plunge to the low desert. Up here it has its own distinct plant community due to the high water table, supporting dense willow and two species of mesquite: honey mesquite, *Prosopis glandulosa* and the rarer screwbean, *P. pubescens*. I have encountered a mountain lion at short range in that zone. All these vistas would be tragically marred if the full 600+acre solar project went ahead.

Perhaps none of this would matter as much if Jacumba were destined to be stuck in its economic doldrums forever. It is not. A hundred years ago the hot springs and a grand multistory stone-fronted hotel made it a nationally known playground for the rich and famous. Outlying satellite towns, now ghost towns like Bankhead Springs, sprang up to accommodate the overflow of the rich-adjacent and famous-adjacent who couldn't quite make it into the main hotel. Then a double-whammy in the 70s: Interstate 8 bypassed the town, replacing Old Highway 80, which had passed through, and the hotel burned down, leaving the town in a slump that's persisted until now. But there are signs of life. The Spa has been bought and is being refurbished. People with some capital and vision have seen potential. A year ago Jacumba Lake was a foul-smelling, tamarisk-choked bog. After repairing a dam at some serious expense and a heroic community cleanup it is once again a big sparkling lake fringed with willow and San Diego sedge, with powerful jets of spring water feeding it, one hot and one cold, and swimmers and blanket-covered beaches and boats and children yelling. The De Anza Resort, on the other side of Round Mountain has also been bought, with plans afoot to spiff it up. There is finally buzz about the land market in the region. And even more anxious buzz about killing the goose that lays the golden egg, because people know that these prospects are fragile and much dependent on the physical beauty of the region.

Land around Jacumba is some of the most undervalued residential land in the county. It looks as if it's set for a boom – with the obvious accompanying boost to the tax base - which could equally easily be snuffed out by a reckless, irreversible assault on the obvious charm of the place. There is no reason why Jacumba might also not undergo significant expansion, with building for residential and other land uses - as long as it remains attractive. There is so much visually degraded land to our east, less desirable for residential use, on the Imperial Valley floor. Why choose a place of such special value and with so much other potential, for a utility project like this?

That all said, there is some agreement in the community that the solar field should not be opposed in its entirety at this point. Green sentiments are generally strong; mine certainly are. Everyone is clear-eyed about the moral conflict in NIMBYism, and most of us concede that the forces behind the project have a case with influential backing. But we are already host to a lot of unsightly infrastructure: 108 acres under solar panels, 58 acres under the ECO substation, two Powerlinks, a 148kV line through town and up past Bankhead Springs. Enough, surely. We're hoping for a compromise this time on the grounds that this patch of land is of exceptional and fragile value. A competing map has been submitted that would confine the field to a less conspicuous 300 acres to the northeast of town, leaving the viewshed from well north of Old Highway 80, and down to the border, more or less unaltered. The landscaping

mitigations that have been offered by the developers to soften the view are band aids - perfunctory and useless in making up for what would be lost by their full 600-acre plan.

I'll end on a note of mild indignation, intending no disrespect. The southeast county is a poor region, thinly populated, but by a surprisingly close-knit community that loves this hardscrabble place and generally gets along with some humor. There is no economy out here to speak of, and there's a general weary sense of having no political clout. There is one sad recurring phrase that one hears whenever the topic of county governance comes up: that phrase is "dumping ground", as in "We are the dumping ground of the county." I could add a litany of detail on this (and the old-timers could add more), but simply there's a sense that the land-use and life-quality interests of the region are consistently overridden whenever there's a trade-off to be made against the interests of other parts of the county, or whenever it's the path of least resistance. Because indeed we can't offer much of that. We ask that the Board consider in good faith our request for a substantially curtailed project, or, at the least, give a delay, so that we can make our strong case stronger - on environmental-impact and other grounds. Thank you.

Sincerely -

- Ian Abramson

CC: Mark Slovick, Deputy Director, Planning and Development Services, Andrew Potter, Clerk of the Board of Supervisors



---

**From:** Shute, Madeline  
**Sent:** Monday, August 9, 2021 11:40 AM  
**To:** FGG, Public Comment  
**Subject:** August 18 BOS comment  
**Attachments:** Spring Valley CPG - JVR letter.pdf; Descanso CPG - JVR letter.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hello,

Please see attached for comment letters for August 18<sup>th</sup> BOS hearing, item #1 – JVR Solar. Letters in opposition.

Thank you,

**Madeline Shute**  
Assistant Land Use & Policy Director  
District 2, Supervisor Joel Anderson  
Email: [Madeline.Shute@sdcounty.ca.gov](mailto:Madeline.Shute@sdcounty.ca.gov)  
Phone: 858-289-9272



## DESCANSO COMMUNITY PLANNING GROUP

Post Office Box 38  
Descanso CA 91916-0038

Joel Anderson County Supervisor, District 2 (Rm 335)  
Clerk of the Board (Rm 402)  
1600 Pacific Hwy San Diego, CA 92101

July 20, 2021

RE: Equity for Jacumba, a Balanced Alternative to Solar Power Generation  
Near Jacumba Hot Springs

Dear Supervisor Anderson,  
I urge you vote to deny the proposed 600-acre Jacumba Valley Ranch (JVR) Solar Major Use Permit Findings, the CEQA findings, and Statement of Overriding Considerations. The JVR project will be on your meeting agenda for August 18, 2021. Approval of the project will devastate the small community of Jacumba.

Instead, I request that you support a fair and balanced alternative called the Equity for Jacumba project alternative, which is Jacumba's proposal to restore important wildlife habitat, create lasting economic opportunities for residents, while accommodating the future development of an up to 300-acre JVR solar facility. This alternative would deliver a significant benefits to local wildlife and the future sustainability of a poor, underserved community.

Specifically, the "Equity Alternative" as envisioned by the Jacumba Sponsor Group would:

- Reserve land for the future eco-friendly expansion of the village of Jacumba, and its local airport within the rural village boundary next to residences and along scenic Highway 80.
- Promote eco-tourism by creating trail head access to the southern part of Anza Borrego Desert State Park (ABDSP) next to Jacumba.
- Develop a restored wildlife corridor that would protect the upper Carrizo Gorge watershed, which provides a water source for the federally endangered and state-threatened Peninsular Bighorn Sheep.
- Build a viable connection between the Carrizo Gorge in ABDSP and the international border to maintain landscape connectivity functions within this region of San Diego County and cross-border habitat in Baja California.
- Preserve important selected historic resources that remain from the former Mountain Meadow Dairy which has been part of Jacumba's visual landscape since the late 1920s. (This dairy, which was one of the largest early dairies in San Diego County was also the largest employer in Jacumba's history.)
- Provide a network of community trails and pathways that promote physical well-being of Jacumba residents and visitors.
- Eliminate the dangerous placement of solar facility components around three sides of the Jacumba airport runway, which is used by glider planes.

### GROUP MEMBERS

Seat 1:  
Kerry Forrest, Chair

Seat 2:  
Jo Ellen Quinting

Seat 3:  
Wayne Hay

Seat 4:  
John Elliott

Seat 5:  
Mark Gassert

Seat 6:  
William Bauer

Seat 7:  
Terry Gibson

As a designated Colonia, Jacumba Hot Springs is one of the County's most economically disadvantaged communities with an annual median income of just \$32,000, which is 150 percent below the state's annual median income. The Equity for Jacumba solar project alternative would, over time, allow for a measured expansion of residential, agricultural, and recreational land uses. This expansion would provide a reliable and critical revenue stream to the local economy, while preserving community character and critical wildlife habitat, and would accommodate the development of an appropriately sized solar energy facility that will not destroy the future of the town.

Thank you for your thoughtful support of Jacumba and the future of the Rural Back Country which are all under potential threats from Renewable Energy, Composting and Vehicle Miles Traveled planning activities.

Sincerely,  
Kerry Forrest,

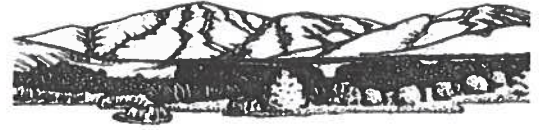
A handwritten signature in black ink, appearing to read "Kerry Forrest", with a long horizontal flourish extending to the right.

Chair Descanso Community Planning Group

CC:  
Clerk of the BOS—please include this correspondence in each of the supervisors' board packages for Aug. 18, 2021

## **SPRING VALLEY COMMUNITY PLANNING GROUP**

P.O. Box 1637, Spring Valley, CA 91979-1637



The Honorable Joel Anderson, County Supervisor, District 2 (Rm 335)  
Clerk of the Board (Rm 402)  
1600 Pacific Hwy  
San Diego, CA 92101

RE: Equity for Jacumba, a Balanced Alternative to Solar Power Generation Near Jacumba Hot Springs

Dear Supervisor Anderson,

The Spring Valley Community Planning Group urges you vote to deny the proposed 600-acre Jacumba Valley Ranch (JVR) Solar Major Use Permit Findings, the CEQA findings, and Statement of Overriding Considerations. The JVR project will be on your meeting agenda for August 18, 2021, and it will devastate the small community of Jacumba.

Although this project is a considerable distance from Spring Valley, our group felt compelled to review this project and chose to support our Jacumba neighbors in opposition to the project as proposed.

Instead, our Group requests that you support a fair and balanced alternative called the Equity for Jacumba project alternative, which is Jacumba's proposal to restore important wildlife habitat, create lasting economic opportunities for residents, while accommodating the future development of an up to 300-acre JVR solar facility. This alternative would deliver several significant benefits to local wildlife and the future sustainability of a poor, underserved community. Specifically, the "Equity alternative" as envisioned by the Jacumba Sponsor Group would:

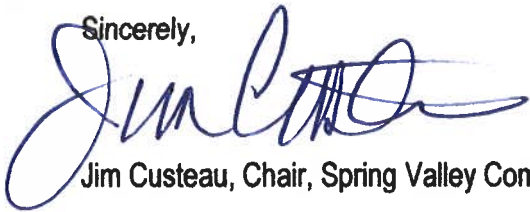
- Reserve land for the future eco-friendly expansion of the village of Jacumba, and its local airport within the rural village boundary next to residences and along scenic Highway 80.
- Promote eco-tourism by creating trail head access to the southern part of Anza Borrego Desert State Park (ABDSP) next to Jacumba.
- Develop a restored wildlife corridor that would protect the upper Carrizo Gorge watershed, which provides a water source for the federally endangered and state-threatened Peninsular Bighorn Sheep.
- Build a viable connection between the Carrizo Gorge in ABDSP and the international border to maintain landscape connectivity functions within this region of San Diego County and cross-border habitat in Baja California.
- Preserve important selected historic resources that remain from the former Mountain Meadow Dairy which has been part of Jacumba's visual landscape since the late 1920s. (This dairy, which was one of the largest early dairies in San Diego County was also the largest employer in Jacumba's history.)
- Provide a network of community trails and pathways that promote physical well-being of Jacumba residents and visitors.

- Eliminate the dangerous placement of solar facility components around three sides of the Jacumba airport runway, which is used by glider planes.

As a designated Colonia, Jacumba Hot Springs is one of the County's most economically disadvantaged communities with an annual median income of just \$32,000, which is 150 percent below the state's annual median income. The Equity for Jacumba solar project alternative would, over time, allow for a measured expansion of residential, agricultural, and recreational land uses. This expansion would provide a reliable and critical revenue stream to the local economy, while preserving community character and critical wildlife habitat, and would accommodate the development of an appropriately sized solar energy facility that will not destroy the future of the town.

Thank you for your thoughtful support of Jacumba.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim Custeau", with a large, stylized initial "J" and a long, sweeping underline.

Jim Custeau, Chair, Spring Valley Community Planning Group

CC: Clerk of the BOS—please include this correspondence in each of the supervisors' board packages for Aug. 18th

---

**From:** Larry Johnson <aljcampo@msn.com>  
**Sent:** Tuesday, August 10, 2021 9:24 PM  
**To:** FGG, Public Comment  
**Cc:** csdiefenbach@sbcglobal.net; Amie Hayes (ahayes.sohosandiego@gmail.com); tisdale.donna@gmail.com  
**Subject:** [External] Comment Letter on JVR Energy Park, Scheduled for BOS Mtg. on August 18, 2021  
**Attachments:** JVR Solar ltr.doc; JVR Energy Park project Jacumba County PC - SOHO comments.pdf

Mr. Potter,  
Please make sure that this Email and attachments are distributed to the members of the Board of Supervisors quickly. These attachments are relative to the JVR Energy Park project to be on the BOS Agenda for August 18, 2021.  
Thank you,  
Larry Johnson, President,  
Mountain Empire Historical Society

# Mountain Empire Historical Society

Gaskill Brothers' Stone Store Museum



Date: August 8, 2021

To: Clerk of San Diego County Board of Supervisors,  
ATTN: Supervisors Joel Anderson, Jim Desmond, Nathan Fletcher, Terra Lawson-Remer,  
and Nora Vargas  
1600 Pacific Hwy., Room 402  
San Diego, CA 92101

Ref.: JVR Energy Park: BOS Agenda August 18, 2021. Equity for Jacumba, a Balanced Alternative to Solar Power Generation Near Jacumba Hot Springs;

Dear Supervisors,

The Mountain Empire Historical Society (MEHS) is a 503c3 organization of volunteers that focuses on the cultural history and the preservation of historical resources within the Mountain Empire area. Jacumba Hot Springs falls within our area of concern.

We believe that an opportunity is being missed by not letting the community of Jacumba Hot Springs gain some benefit from the proposed 1356-acre solar project and at the same time allow the applicant a scaled-down solar facility that would still be one of the largest in the County. To this end, the Jacumba Hot Springs Sponsor Group has proposed a scaled-down project called the "Equity for Jacumba Alternative."

A scaled-down project would benefit the community by:

1. Providing a larger buffer between the solar panel part of the project and the edge of town,
2. Providing a better buffer around the Jacumba airport,
3. Providing more area for the town to expand within its Rural Village Boundary,
4. Protecting and preserving selected important resources in the project area such as some of the former Mountain Meadow Dairy structures all connected by a trail system.

The MEHS has reviewed a large part of the CEQA findings for this proposed project and wants to stress the following important statements and facts:

1. The County of San Diego has a very good "Community Trails Master Plan" managed by the Parks and Recreation Department. The Plan notes; *"These trails and pathways are intended to address an established public need for recreation and transportation, but will also provide health and quality of life benefits associated with hiking, mountain biking and horseback riding throughout the County's biologically diverse environments."*
2. The Master Plan contains plans for twenty-two (22) towns and communities in San Diego County.
3. There is NO plan for Jacumba Hot Springs!



4. A new set of Trails in Jacumba Hot Springs and on the proposed 1356-acre project could tie together many existing off-site significant points of interest along with many cultural and biological sites already known to exist on the proposed project site.
5. One of the key on-site points of historical interest is the Mountain Meadow Dairy with structures dating back to the late 1920's.
6. The CEQA findings went to great lengths to disqualify the Mountain Meadow Dairy from the National Register of Historic Places (a high standard), The California Register of Historic Resources, the CEQA rules themselves and even the County of San Diego Local Register of Historic Resources.
7. The dairy most certainly meets the majority of the County of San Diego Local Register of Historic Resource requirements! It also seems to meet the requirements of the San Diego County General Plan Goal COS-8 dealing with the "Preservation and Adaptive Reuse" ... of historic sites, structures and landscapes ...
8. This opinion is also supported by the Save Our Heritage Organization (SOHO) which firmly supports the idea that portions of the Mountain Meadows Dairy are historically significant and are a part of the history of Jacumba Hot Springs and San Diego County. A copy of the SOHO letter is attached.
9. A reference book entitled "Renegades, Rock Houses and Resorts...Stories of Jacumba Hot Springs and Surrounds" covers the long and eventful history of Jacumba Hot Springs and the surrounding area.

So where does that leave us? The MEHS requests the Board of Supervisors require the JVR project developer to do the following:

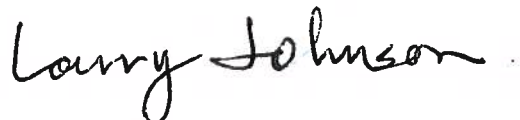
1. Work with the community of Jacumba to compromise on a smaller JVR project footprint based on the Equity for Jacumba Alternative framework which would be a win-win for both the town and the County renewable energy goals.
2. Work with the Parks and Recreation Department to generate a Draft "Community Trails and Pathway Plan" for Jacumba Hot Springs that ties the community and the project together into an integrated system. The Applicant should pay the necessary fees for the trail system,
3. Create trail access via a dedicated and signed north/south public trail next to the community that would connect the international border to the southern part of Anza Borrego Desert State park (ABDSP). This would boost local eco-tourism and provide a potential revenue stream for the town.
4. Create a wider 1,000-foot restored wildlife corridor (buffer) along the eastern edge of Jacumba that would protect the upper Carrizo Gorge watershed, which provides a water source for the federally endangered and state-threatened Peninsular Bighorn Sheep.
5. Dedicate a public trail that leads to the site of the former Mountain Meadow Dairy where the solar facility owner would preserve/maintain a few selected historical structures for the life of the solar facility. This educational site would tell the history of the former dairy using a large kiosk with information and photos. (The developer to work with the MEHS on historical context for public benefit.)



**The County of San Diego should be the defenders and protectors of the community of Jacumba Hot Springs, and as such, County leaders must require a smaller solar project that would ensure the future viability of the town.** Should be project developer refuse to work in good faith toward a reasonable compromise, then, the Board of Supervisors should deny this project in total.

Thank you in advance for choosing to support an appropriately-sized solar facility, one that will not destroy the future sustainability of Jacumba Hot Springs, and one which includes an integrated trail system which preserves important historical resources like the former Mountain Meadow Dairy farm.

Sincerely,

A handwritten signature in black ink that reads "Larry Johnson". The signature is written in a cursive, flowing style.

Larry Johnson  
President, MEHS

Clerk of the BOS, please include this correspondence in each of the Supervisors' packages for the August 18, 2021 BOS hearing.

Attachment: SOHO letter dated July 8, 2021



## 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 structures 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 during 1918-1945 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