



DEPARTMENT OF PARKS AND RECREATION
COLORADO DESERT DISTRICT
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April 22, 2019

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PROJECT NAME: JVR ENERGY PARK
PROJECT NUMBER(S): PDS2018-GPA-18-010, PDS2018-REZ-18-007,
PDS2018-MUP-18-022
ENV. REVIEW NUMBER: PDS2018-ER-18-22-001

To Bronwyn Brown and Relevant County of San Diego Staff:

Thank you for the opportunity to comment on the proposed JVR Energy Project as the County of San Diego begins to draft the project's Environmental Impact Report (EIR). The California Department of Parks and Recreation (CDPR) manages the Colorado Desert District and Anza-Borrego Desert State Park® (ABDSP), the largest state park in California. We think it is vital that the following elements be studied in the environmental review process and included in the EIR.

Adjacent Land Ownership: At the time of this comment letter submission, there are 1,080 acres of land directly adjacent to the project that are owned in fee title by the Anza-Borrego Foundation (ABF) that are managed by the California Department of Parks and Recreation under a 2016 lease agreement as part of ABDSP. It is very likely that by the time the project EIR is drafted, a land transfer currently in process will be complete and all ABF lands will be owned in fee title by the State of California and be part of ABDSP.

"The Project Issues Discussed in the Document" section of the Notice of Preparation is incomplete. The project is directly adjacent to lands managed by CDPR as part of ABDSP. ABDSP lands also continue north of the project area and the proposed project will be visible from various locations in the State Wilderness north of Interstate 8. We think it important that Recreation/Parks be included in issues evaluated in the EIR.

The following are topic areas examined in the environmental review process and included in the EIR because of potential impacts that may affect State Parks lands, resources, mission, and operations:

BIOLOGICAL AND NATURAL RESOURCES:

Habitat, Biodiversity, and Wildlife Connectivity: In 2007, The Nature Conservancy purchased the 1,080 acres adjacent the proposed project area as an interim step in transferring ownership to California Department of Parks and Recreation. In 2012, title was transferred to the Anza-Borrego Foundation to hold until the State of California was ready to accept the transfer. The Nature Conservancy recognized this area as internationally significant in terms of biodiversity and as an important linkage between biologically rich Mediterranean habitat in Southern California and Northern Baja California plant and animal communities. Development such as this project in the San Diego border region fragments habitat and threatens wildlife corridors between these communities.

In a report released in June of 2007, The Conservation Biology Institute identified three objectives of the 2007 acquisition by the Nature Conservancy:

- 1) Conserve habitat designated as the Southeast San Diego recovery unit (Jacumba habitat complex) for the federally endangered Quino checkerspot butterfly (*Euphydryas editha quino*) (USFWS 2000):
- 2) Buffer the entrance to the Carrizo Gorge which provides a water source for the federally endangered and state threatened Peninsular bighorn sheep (*Ovis canadensis nelsoni*);
- 3) Build a connection between the Carrizo Gorge in ABDSP and the international border to maintain landscape-scale connectivity functions in this region of San Diego County and cross border connectivity with habitat in Baja California.

In light of these objectives identified when the property was first acquired for preservation, the proposed could negatively affect the biological resources of the area.

The environmental review of this project must include the wildlife connectivity through the Peninsular Ranges between Mexico and the United States.

Temperature: *The Photovoltaic Heat Island Effect: Larger solar power plants increase local temperatures*, a 2016 article from the journal *Nature* describes effects of +3-4°C over wildlands temperature due to changing vegetative structure, reflective value, and may ultimately become a “heat island” in arid ecosystems.

<https://www.nature.com/articles/srep35070#article-info>

Precipitation: Another 2016 article from the journal *Nature*, *Impact of solar panels on global climate*, indicated that in one study simulation, solar panels resulted in a 20 percent decrease in precipitation in the desert and arid environments.

<https://www.nature.com/articles/nclimate2843>.

Water and Hydrology: Potential for reduced precipitation by the project and groundwater depletion by the project’s construction and ongoing maintenance should be evaluated in the larger context of potential watershed impacts to Carrizo Creek, Carrizo Canyon, and Carrizo Marsh in ABDSP. Analysis and restoration efforts in the Carrizo watershed and biologically important riparian areas may be significantly impacted by

groundwater depletion. The project could potentially alter existing drainage patterns and absorption rates. The project could potentially degrade water quality in the basin.

Riparian areas: The area looks to be within natural southern drainage of the Jacumba and In-ko-pah Mountains, and Carrizo Gorge. The riparian drainage route could potentially affect both San Diego and Imperial counties, including the communities of Jacumba Hot Springs and Ocotillo. This project area could also potentially interrupt natural drainage flow lines through the area. The project could affect the amount of surface water or natural bajada areas, often used by wildlife and rare plant communities.

Storm water runoff: The proposed project appears to be in a flood zone. Project area may create, increase, or contribute to runoff greater than the surface runoff, causing increased flooding on or off site. Evaluation of related impacts and drainage issues are of concern to ABDSP as they may impact park access points.

Soil: Vegetative removal, project construction and road building during the project, to include ongoing infrastructure and road maintenance will create dust and potential erosion of already fragile soil types. Soil degradation including increased wind or water erosion, salinity, loss of organic matters, fertility decline, pH level, compaction, surface sealing, and mass movement or contamination, should all be evaluated for impact.

Air Quality: This area is located within the San Diego Air Basin. The area is subject to frequent hazy conditions at sunrise, followed by rapid daytime dissipation as winds pick up and the temperature warms. Natural air flows could be interrupted by the proposed project. Dust potential throughout the life of the project needs to be evaluated for impact on air quality, ABDSP, its visitors, wildlife, and plant communities.

Light: Impacts resulting from the vast area of reflective panels on ambient light levels should be evaluated for impacts to wildlife visitors, including birds and insects. Wildlife may mistake the large solar array as water, thereby diverting migrating birds and insects in search of water and rest.

Biologic Resources – Although the area is fallowed agricultural fields, the area provides suitable habitat and nesting for approximately 60 migratory birds and other year round dwelling plant and animal residents or habitat types.

Source: <https://apps.wildlife.ca.gov/bios/?tool=cnddbQuick>; List CNDBB Species for Jacumba Quad. April 2019).

ARCHAEOLOGICAL AND CULTURAL RESOURCES TOPICS:

Prehistoric Cultural Resources: Four recorded archaeological sites, including one rock art site, may overlook the project and could have their native setting impacted by the project.

Setting is used to evaluate site integrity when determining eligibility for the National Register of Historic Places and is defined by National Parks Service as “the physical

environment of a historic property that illustrates the character of the place. Integrity of setting remains when the surroundings of an aid to navigation have not been subjected to radical change. Integrity of setting of an isolated lighthouse would be compromised, for example, if it were now completely surrounded by modern development.”

These four sites have not been evaluated for the National Register of Historic Places, but if they are eligible this project could affect the setting and therefore their integrity.

It is important that a qualified archaeological survey team visit all the sites and see if they overlook the valley and proposed solar installation. If so, it is very important that these sites be evaluated for eligibility for the National Register of Historic Places to determine how the solar installation may affect that eligibility. Colorado Desert District archaeologists can assist a team of qualified archaeologists in this effort.

RECREATION AND PARK TOPICS:

CDPR is tasked with expanding access to parks and making parks relevant to all Californians. CDPR is concerned that visual impacts to the view shed, sense of place, and setting of the ABDSP land adjacent to the project will negatively impact potential visitor use of that park land. The sheer magnitude of this large solar project may permanently negatively impact the visitor experience because the project will be so visible and present, even while in the park. Careful consideration and evaluation of those impacts on park land and park visitors is very important.

Since the project is directly adjacent to the park, access issues need to be evaluated. The question as to whether the change in land use and the necessary general plan amendment is in the best interest of the citizens of Jacumba Hot Springs, San Diego County, and California needs to be fully addressed.

Wilderness: The California Wilderness Act begins with the following language: “In order to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas on state-owned lands within California, leaving no areas designated for preservation and protection in their natural condition, it is hereby declared to be the policy of the State of California to secure for present and future generations the benefits of an enduring resource of wilderness.” The proposed project area sits directly adjacent to California State Parks designated Anza-Borrego Desert State Park Wilderness.

HEALTH AND UNDERSERVED COMMUNITY TOPICS:

Access to parks, nature, and the outdoors is documented as necessary for the health of children and adults. In the February 2015 publication, *A New Vision for California State Parks, Recommendations of the Parks Forward Initiative*, recommended actions include expanding access to parks in underserved areas. The proposed project may negatively impact that access for the underserved in the community of Jacumba Hot Springs and should be evaluated.

PROJECT INFRASTRUCTURE:

The proposed project size and proximity may negatively affect State Park land aesthetics, view shed, dark sky designation, and recreation potential. The infrastructure impact of a project this size in a rural setting should be carefully considered. How will people be impacted by the project and does it warrant the change in land use and general planning that the County of San Diego has already in place?

Please keep me informed as the environmental review and planning processes continue. If you have any questions, please contact Terry Gerson.

Sincerely,



Gina Moran
District Superintendent
Colorado Desert District