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April 6, 2019

County of San Diego
Planning & Development Services
5510 Overland Ave, Ste. 310
San Diego, CA 92123
Attn: Ms. Bronwyn Brown

Subject: JVR Energy Park

Dear Ms. Brown,

I have owned a residence in Jacumba since 2012. My property overlooks the historic Ketchum Ranch which is the proposed site of the massive solar farm called JVR Energy Park. See April 2019 photo of the Jacumba Valley (below).

After receiving information about the proposed industrial-sized solar project via a notice of preparation dated March 7, 2019, I reviewed the Mountain Empire Sub-Regional Plan adopted by County Supervisors on August 3, 2011 and later amended in 2016 to see if such project was compatible. Surprise, surprise...this project clearly would not be an acceptable land use. The sub-regional plan which identifies elements important to the small rural town of Jacumba, reads in part:

> "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 language in the Mountain Empire Sub-Regional Plan clearly prohibits the placement of a 90 megawatt, industrial-size photo-voltaic (PV) farm on 691 acres of prime agricultural land in the heart of the Jacumba Valley, where it flanks private residences, our community park, and senior center on two sides.

Wanting to see firsthand the potential visual and noise impact of a large solar facility, I recently visited the massive solar farm located in the desert near Calexico. See April 2019 photos of the Calexico facility (below).

The proposed JVR Energy Park which consists of 300,000 PV modules, 26 battery storage units, an on-site collector sub-station, other associated infrastructure surrounded by a seven-foot high chain link/barbed wire fence and a large SDG&E switch-station immediately adjacent to the project would negatively impact the future economic vitality and quality of life for Jacumba residents in many ways. Specifically the JVR Energy Park would:

-Restrict the potential for population growth/residential expansion of Jacumba.

-Eliminate future agricultural land use as the project will scrape the top 12 inches of soil and compact it. Electro-magnetic radiation flowing through the solar panels for 35-years, will essentially sterilized the soil of all nutrients.

-Eliminate natural wildlife corridors, potentially impact important habitat of the endangered Quino Checkerspot butterfly, and drastically reduce existing food sources for avian populations of golden eagles, red-tailed hawks, owls, and tricolored blackbirds. It would also negatively impact habit and food sources for amphibians and reptiles: the spotted frog, geckos, coachwhip snakes, rosy boas, garter snakes, and small scavengers such as bobcats and antelope ground squirrels.

-Increase wildfire danger to the community associated with the solar farm's electrical infrastructure: battery storage, overhead transmission lines, and a SDG&E switch-station.

The insertion of another massive electrical facility into the wildfire-prone backcountry without properly trained local first responders equipped with electrical firefighting suppression equipment is a recipe for a community disaster. The placement of a 10,000 gallon water tank at both of the solar facility entrances as described in the major use permit does not provide any real protection. (A single family dwelling in the backcountry is required to have a 10,000 gallon water tank available for fire department use.)

-Lower already depressed property values of local residences due to effect of mechanical noise pollution: solar panel motors tracking the sun, low frequency humming of transformers, etc. that would disrupt the quiet, natural environment. Solar panel glare from 300,000 solar cells will also eliminate scenic vistas of Jacumba Valley. See April 2019 photo of Jacumba Valley (below).

-Remove landmark structures associated with the historic Mountain Meadow Dairy that have been a part of Jacumba's landscape since the late 1920s, and replace them with solar panels visible for several miles. (This dairy, which later became the Ketchum ranch/farm, was operated through the 1980s and it was Jacumba's largest employer.) Some of historic buildings deserve preservation and must be further evaluated.

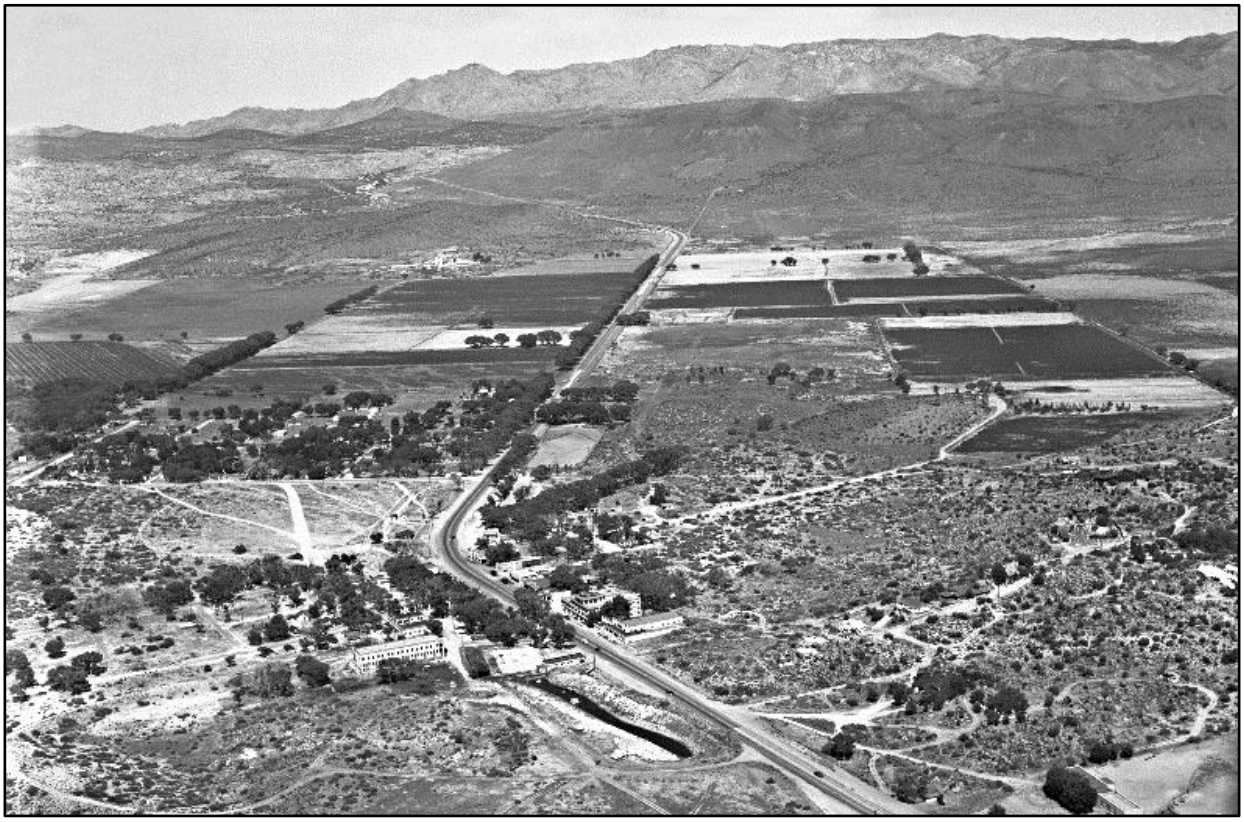
-Most certainly draw down local aquifers with the enormous amount of water (several millions of gallons) that will be needed during the construction phase of the solar park and over the life of the project to periodically wash the dust off hundreds of acres of solar panels. Water quality in local creeks may also be adversely affected by potential contamination from leaking transformers and runoff that contains chemical agents used to control vegetation near solar panels.

-Damage recently resurfaced roads such as Old Highway 80 and Carriso Gorge Road. (Thousands of heavy trucks trips will be required during the construction phase.)

-Likely interfere with future glider operations at Jacumba's small 2,508-foot airstrip/glider port. The Jacumba airport is used primarily by glider pilots who rely on thermal

air currents to soar over the scenic Jacumba area. Radiant heat absorbed (and reflected) by thousands of nearby solar panels may adversely impact those thermals. The solar panels will introduce visual glare and add physical obstructions next to the runway which may pose problems for glider pilots and the pilots of small planes landing under emergency conditions.

-Significantly reduce visitor traffic to the Jacumba Hot Springs area due to visual blight created by an industrial facility that virtually obliterates the natural landscape. Cross-country and local cyclists, motorcycle and auto groups may chose alternative scenic highways instead of travelling on Old Highway 80. Any reduction in visitor traffic will negatively affect businesses already having a tough time. See April 2019 photo which shows historic dairy buildings located on the north side of Old Highway 80 (right). The JVR landscape plan as described on the Major Use Permit will not effectively screen the massive JVR solar farm. That plan proposes the planting of three non-native species of slow-growing oak trees, and shrubs like the Toyon, which are unlikely to be successful in the high desert clime of Jacumba. (Junipers, pines, cedars, spruce, desert willows, and even the fast-growing cottonwood trees that historically lined Old Highway 80 and woody shrubs like the elderberry would be better choices.) See 1952 aerial photo of Jacumba (below).



Based on the project's Major Use Permit and CEQA Initial Study documents, it will significantly impact the natural landscape by eliminating large swaths of wildlife habitat and reducing ground water resources. It will likely elevate ambient temperatures in the Jacumba area and help to dry out vegetation when warm Santa Ana winds blow across the acres of solar panels. This project will insert increased fire risks into the village core, and lower property values in the already economically disadvantaged community of Jacumba. The associated visual blight of an enormous solar park will certainly discourage visitors seeking the potential health benefits of Jacumba's natural mineral waters, or pursuing recreational activities such as hiking, bird watching, etc. It will also discourage new businesses from moving into town. In March 2019, a prospective buyer of the Jacumba Spa and Motel abandoned the idea when they learned that an industrial solar park may be built adjacent to the village of Jacumba. This massive solar farm would squander important land that could be used for more homes or that would support a return to Jacumba's agricultural roots.

From a local prospective, the placement of this large-scale energy park would be yet another "nail in the coffin" of our small community that continues to be California's dumping ground for "released" sexually violent predators. **If the project is approved, it will also set a county precedent that it is okay to construct industrial-sized, renewable energy projects immediately adjacent to senior centers, parks, and village centers.**

In February 2019, San Bernardino County Supervisors adopted a policy that has banned the construction of large solar and wind farms on private land, bending to the will of their constituents who say they don't want renewable energy projects industrializing their rural communities.

> "…The policy approved by the supervisors prohibits utility-orientated renewable energy projects-defined as projects that would mostly serve out-of-town utility customers, rather than local power needs-within the boundaries of Community Plans adopted by more than a dozen unincorporated towns. Construction of utility-oriented solar and wind farms would also be banned in so-called Rural Living zones…"
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> *www.latimes.com/business/la-fi-san-bernardino-solar-renewable-energy-story*

San Diego County officials should follow San Bernardino's lead and consider the cumulative impacts of numerous industrial renewable energy projects on their constituents who live in Boulevard and Jacumba. These are people who moved to the backcountry in order to raise families or retire in a natural environment with clean air and scenic vistas.

While I am not against solar farms, or other forms of renewable energy, they do create huge and unnecessary footprints in our rural landscapes. A much more efficient approach to renewable energy generation is the creation of energy at its point of use. This can realistically be achieved by the placement of solar panels on new/existing rooftops and parking structures. If industrial-size facilities are needed, they are more appropriately located near the urban region where the energy is to be used or well away from residences in desert areas.

A solar park of this magnitude will engulf the small village of Jacumba and impose irreparable harm to the quality of life for its occupants. This project would never be considered as a compatible land use in the Del Mar Valley or even be placed adjacent to any other village center within the county. **Planners and county supervisors must there reject the JVR Energy Park project in its entirety. The energy that it would create can be easily generated by rooftop solar installments.**

Cherry Diefenbach

CC: Supervisor Dianne Jacob