

To: Bronwyn Brown, Planning and Development Services

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The following are comments and concerns of mine in regards to the JVR Solar Park (PDS2018-GPA-18-010, PDS2018-REZ-18-007, PDS2018-MUP-18-022)

Aesthetics:

Large concentrated photo voltaic arrays will diminish view shed quality and are in view along Historic Old Highway 80. This could diminish property values that were purchased and appraised for their views. In addition, this could diminish recreation and tourism to the area.

Air Quality:

Dust could be an issue due to winds. Dust control abatements need to be available 24/7 as once the ground is disturbed dust will be an issue as experienced on other projects, example when construction workers are off work, often no one is available to mitigate the problem of dust during off hours.

Biological:

The project area is home to Peninsular Big Horn sheep, Quino Checker Spot butterfly, Golden Eagle, Red Tail Hawk, Harris Hawk, Tri Colored Black Bird, Mountain Lions (cougars), and Turkey Vultures. Black Panthers are also native to California and Mexico. We currently have bobcats in close proximity of residences due to the incursion of their habitats of previous projects. The project area also could create. Barrier effects to these species and could diminish foraging and hunting areas. The project area is also within the Sonoran Desert region which is a diverse and fragile ecosystem. The region incorporates southern Arizona North to the Mogollon Rim, the southeastern corner of California drawing a line south From Needles to Palm Springs to San Diego, the state of Sonora, Mexico, the Baja California Peninsula of Mexico, and the Gulf of California. The projects need to be studied for cumulative impacts as there are many projects that have completed or are in construction and planning stages. The cumulative effects need to be evaluated from Imperial County and San Diego County.

Greenhouse Gas Emissions:

Construction phase will contribute to short term contribution of greenhouse gases from equipment working on the project. Long-term contribution is likely from loss of vegetation which is valuable in carbon sequestration during its lifecycle. The cumulative impacts need to be studied for this area.

Hazards and Hazardous Materials:

The project is next to the County Regional Airport and can pose a hazard to pilots of gliders that use the facility also the project is next to residential structures and could pose potential health and safety hazards to those residing next to project. Introducing electrical lines and other infrastructure could increase potential for wildfires. Studies for the area usually, state there is a low fire activity in the area; however, they do not take into account that these areas have little or no improvements or infrastructure and limited public access. The introduction of electrical lines, infrastructure, and people would increase the probability of a fire starts within this area. Overhead power lines and infrastructure would reduce the effectiveness of aerial firefighting resources, causing fire commanders to alter strategy and tactics. Fires could potentially become larger. The project area is within a Wick area which during a Santa Anna event could be catastrophic and devastating to San Diego as experienced in 2003 and 2007 conflagrations. Concentrated photo voltaics also pose a hazard to firefighters as the CPV arrays cannot be shut down only the inverters are shut down. The CPV array, array wiring, combiners, and home runs to inverters are fully energized at high voltages. Even at night when work lights and even moonlight can generate enough energy that could potentially be dangerous or lethal to firefighters. Another concern is lightning strike and attraction that the infrastructure may impose to the area and another potential ignition source for wildland fire. The cumulative impacts need to be studied for the area.

Hydrology and Water Quality:

The projects could substantially alter the existing drainage pattern of the site or area through alteration of the course, in a manner which will result in substantial on or off-site erosion or siltation and could substantially increase the rate or amount of surface runoff in a manner which would result in off-site flooding which could degrade water quality to Wells and Springs within the area. Furthermore, this could result in inundation by mudflows from the project areas. The community of Jacumba is totally dependent on wells and springs for their water needs. The cumulative effect of the projects has to be

studied thoroughly as water is the lifeblood of the community. Jacumba has unique resources which are hot water springs which support a local business and many other surrounding businesses in the area.

Noise:

Noise would be an issue during construction, as has been experienced by residents during the border fence construction, which proceeded 24/7 during construction and have experienced during the construction of Sun Rise Power Link. SDG&E requested and received waivers for hours and days of work increasing residents to more noise. Tule wind also created noise from the numerous trips of water trucks and construction equipment and vehicles. Inverters and appliances could also introduce noise into the area that was not present in the rural setting. This could potentially raise the ambient nighttime noise levels.

Public Service:

The area is currently served by two fire stations, which are Jacumba and Boulevard. This would require the stations to have specially trained firefighters with specialized equipment at the stations full time to respond to possible emergencies at site. Boulevard and Jacumba stations have a large call volume already due to I 8 traversing its response area. The projects have the potential of adding more responses to the stations call volume. The projects and as well as other projects in the area, need to be studied for the cumulative impacts to the area.

Recreation:

The projects would impact recreation as people come to the area for the view, dark skies, quiet, wildlife, and hiking. The views will be tarnished by the big CPV arrays and hiking areas could be decreased due to the large amount of land used for these projects. This will also diminish the main attraction to Jacumba which is the Hot Springs. The Jacumba was in escrow and fell out after announcement of the project. The cumulative impacts of all the projects in the area will have a significant impact on recreation and tourism to the area. These cumulative impacts need to be studied extensively.

Transportation:

Construction traffic will have an impact on local roads residents and wildlife. The construction traffic experienced with Sun Rise Power Link. There have been 50 or more trucks a day continuously traveling Highway 80, tractor-trailers hauling heavy equipment, water trucks, and pickup trucks as well as the traffic experienced from the Tule wind project. The vehicles many of them speeding and using cell phones while driving. There has been A large number of wildlife killed along the roads from construction

traffic. Old Highway 80 is showing signs of disrepair because of this traffic as well as other residential roads. The roads in the project areas were not designed for this traffic use. This needs to be studied for the cumulative impacts on these roads.

EMF and Radio Frequency Emissions:

This area needs to be studied and the effects of EMF and RFE on residents and wildlife. The level of exposure needs to be addressed and not taken as a single project but as a whole of all projects proposed in the area. This would show an accurate exposure level to the residents and wildlife. This needs to be studied for the cumulative impacts.

Cumulative impacts as stated in PRC Division 13 Environmental Quality Article 20

15355 Cumulative Impacts

"Cumulative Impacts" refer to two or more individual effects which, when considered together are considerable, or which compound or increase other environmental impacts.

(a) The individual effects may be changes resulting from a single project or a number of separate projects.

(b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonable foreseeable probable future projects. Cumulative impacts can result from individually minor, but collectively significant projects taking place over a period of time.

We hope you take these comments and concerns and address them to the full extent possible. If you have questions or need further clarification feel free to contact me. Thank you for your time and allowing me to comment on this project.

Regards,

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