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April 8, 2019

Bronwyn Brown,  
Land Use and Environmental Planning Manager  
County of San Diego  
Planning and Development Services  
5510 Overland Ave, Suite 310  
San Diego, CA 92123

Project Name: JVR Energy Park  
Project Numbers: PDS2018-GPA-18-010; PDS2018-REZ-18-007; PDS2018-MUP-18-022  
Environmental Review Number: PDS2018-ER-18-22-001

Dear Ms. Brown,

This letter is being submitted on behalf of the Anza-Borrego Foundation in response to the Notice of Preparation document for the proposed JVR Energy Park. We ask that the following information be considered as the County of San Diego begins to draft the Environmental Impact Report.

The proposed project site is adjacent to 1,080 acres owned in fee title by the Anza-Borrego Foundation and managed by the California Department of Parks and Recreation under a 2016 lease agreement as part of Anza-Borrego Desert State Park. The property is in the process of being transferred to Anza-Borrego Desert State Park and the transfer will likely be complete by the end of 2019.

In 2007, The Nature Conservancy purchased the 1,080 acres 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 title 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 in the San Diego border region fragments habitat and threatens wildlife corridors between these communities.

In a report released in June of 2007 by The Conservation Biology Institute, they 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 candensis nelson*);
- 3) Build a connection between the Carrizo Gorge in Anza-Borrego Desert State Park (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, a project of this size as proposed, would have severe negative impacts to the biological resources of the area.

The CEQA Initial Study does not list recreation as being impacted by this project, however we believe that this project would have significant impacts on the recreation potential to the adjacent park land as well as having negative impacts to the scenic vista.

We respectfully ask that Anza-Borrego Foundation be kept informed as the environmental review and planning process moves forward.

Sincerely,

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

Brianna Fordem  
Interim Executive Director  
Anza-Borrego Foundation