

**From:** [Jeffrey Osborne](#)  
**To:** [Harris, Susan](#)  
**Cc:** [Koutoufidis, Nicholas](#)  
**Subject:** JVR Park Comment Letter  
**Date:** Monday, December 07, 2020 3:10:25 PM  
**Attachments:** [Jeff Osborne - JVR Park.pdf](#)

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Comment letter attached.

December 7, 2020

Planning and Development Services  
County of San Diego  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123

RE: JVR ENERGY PARK

My name is Jeff Osborne and I am one of three partners, that are the new owners of Jacumba Hot Springs Resort and 150 acres of surrounding property including most of the commercial property in the town of Jacumba Hot Springs.

We are proponents of green energy and solar power. We hope for a future where we can balance our energy consumption with its environmental impacts. We think we can solve our problems with technology and developments like this one. This project unfortunately just chose the wrong place to be. This is an industrial energy project, that's larger than the town itself, that will surround a scenic, tourist destination. It just doesn't make any sense.

My partners and I purchased this property just this year, with the vision to bring back Jacumba Hot Springs to its former glory as a renowned destination resort town revolving around the healing natural hot springs, art, music the scenic desert landscape and sustainable architecture.

We are artists, we are designers and we are local San Diego proprietors that see Jacumba for what it really is and what it can so easily be once again. It is a truly beautiful valley, with an impossible to replace history. This is not just any place.

Since we have taken over the resort just 2 short months ago, we have increased the payroll by over 30%, we currently employ 20 residents of the region and plan on tripling that within the next 3 years as we expand our offerings in Jacumba for visitors to enjoy the rural, high desert landscape that Jacumba is lucky enough to offer. Mixed with art, live music offerings and other professionally produced special events. This valley will thrive once again.

We see a future with many new families, children playing in the park, and visitors enjoying the scenery and natural hot springs. A vibrant community for those seeking a refreshing change of pace from busy urban environments. Seeking an authentic, history rich town to enjoy with their families and friends.

Unfortunately this project is clearly proposed by a company that does not know much about, live in or care about this area. The company is not from San Diego, or California, or even the United States. I would venture to guess that the primary financially interested party in the project only knows Jacumba from a satellite map on their computer or an executive helicopter flyby, and is only focused on its financial value to themselves or their company. They have no

interest in the East County, the beauty of the high desert; the history of the Mountain Empire Region, of Jacumba, its historic significance, or its residents .

To get down to the specifics of the project in question:

What I want to understand is how this project is addressing its impacts on its clear conflicts with the Mountain Empire Regional Plan.

These are direct quotes from the mountain empire regional plan:

Mountain Empire Regional Plan

6. Minimize the visual impacts of hillside developments with buildings, retaining walls, and other improvements deferring to the natural landforms and kept to as low a profile as possible. [PP]
7. Preserve open space areas, such as steep slopes and canyons, floodplains, agricultural lands, meadows, and unique scenic views and vistas by clustering residential development away from such areas.
8. Buffer residential areas from incompatible activities that create heavy traffic, noise, lighting, odors, dust, and unsightly views. [PP]

I want to emphasize the working around the natural landscape, minimizing unsightly views, preserving open space areas such as agricultural lands and unique scenic views and vistas.

Why is this project allowed to do this? To be so against the land use policies in the County General Plan and Mountain Empire Regional Plan and not address that in this DEIR? A utility scale solar farm project like this can be built in MANY other places in the East County or Imperial County. So why does this project have to be built here? Where it will surround a town on 3 sides and take away its rural character? Why does the the DEIR not address this point? Why here? Why not somewhere else? Without this information, the DEIR is inadequate as written.

I also would like to know how this development has somehow withdrawn their application for a General Plan Amendment and Rezone. The land this project is proposed to be built on has a regional category of Village and is zoned for specific plan. How are they getting around applying for that? Why isn't an industrial energy project the definition of something that needs a general plan amendment as well as a rezone approval? This specific plan area is NOT for this.

Interim – I have heard this project is somehow being discussed using an unofficial and undefined term of "Interim" so that it does not require a rezone or general plan amendment. This project is not Interim, they plan on installing a switchyard, which gets conveyed to SDGE and will be out of the jurisdiction of any decommissioning plan. How can they define this as Interim? If this plan has a switchyard, it cannot be considered interim. Switch yards do not get decommissioned and the planners of this project can never promise a decommissioning of a switch yard.

Specific Plan Area – if they are somehow using the major use permit to get around zoning

Aesthetics - people move and live in the far reaches of the East County to enjoy the natural aesthetic. Old Highway 80 is a county designated scenic highway. This report completely blows past this point and barely mentions they will literally envelope, on both sides, Old Highway 80, a scenic highway.

I can tell how little the designers of this project have really been here or know the area, because they are proposing 6-foot tall chain link fences with a strip of little baby trees to be planted and solar panels that can be up to 12 feet tall. Please, come drive this road, tell me it is not absolutely, uniquely beautiful, and that this project will completely destroy its most valuable resource, its back country character that has brought its residents and visitors here for generations.

Is this chain link fence and sapling plants that will take 10+ years to mature properly addressing the aesthetic character of the area?

Outside of my comments on this project revolving around the community's character and county aesthetic designations that it is violating. I believe this EIR has wholly missed addressing MANY other very basic considerations.

Pesticides, Dust and Wind –

Can they guarantee they will not be using pesticides to keep certain plants/weeds down? They mention the use of pesticides but are not specific.

What kind of pesticides will they be using to prevent vegetation? Will they be allowing vegetation to hold the soil? How will this work? I assume pesticides are the only answer to prevent vegetation from interfering with the solar panels. This project would leave over 700 acres, just east of town, as bare, pesticide-saturated soil beneath the solar array. The prevailing wind in Jacumba runs from the East to West, you can see this by the way all wind turbines in the area are positioned. The Mountain Empire region, and Jacumba, are extremely windy areas. Hence all the wind farms. Wind gusts in Jacumba often reach 50 mph+. What happens when 50+ mph winds blow into dry, bare soil, that is saturated in pesticides. They will blow that toxic dust directly to the west, into the town itself and into the homes, and lungs of its population. Is this really a good idea? If we have ground cover and plants, they can hold the soil, but solar panel arrays, do not. Can they promise us in just 1 year after this project is completed that Jacumba will not be covered in a thick blanket of toxic dust after every wind event? (which is often in Jacumba). Can they please properly address this issue?

Economic –

Jacumba Hot Springs is a historic resort town built in the 20's by ex San Diego Mayor Bert Vaughn. Clark Gable and many other celebrities used to frequent the town. To this day international travelers and travelers from all of the country come to soak in its healing hot springs. What will happen to this business, the only business keeping this town alive, when the

town is permanently designated an industrial zone, as this project will do. What is there responsibility to address this economic impact? Its like putting a giant wind mill in Yosemite Valley. What will that do? Is that a good idea? People come here for the very thing this project will destroy – the solitude and healing properties of natural desert open space. It will reduce visitor traffic, it will reduce property values, it will reduce the amount of jobs available in Jacumba. How are they addressing that impact?

The need for this project in relation to the other projects in the area -

The need for a 90 MW project - this EIR does not explain at all why we need this project here. There are 5 other renewable energy developments proposed within 10 miles of this project, including Tule Wind Farm (176MW), Rugged Solar (74MW), Boulevard Solar (60MW), Cameron Solar (1.7 MW) and Torrey Wind (126MW). Do we really NEED to destroy a town in order to build one more? Can the please justify the need for this project and can the county just consider how this project will impact a community that has already had to take the burden of the Sunrise Valley Powerlink that scarred our landscape with large high voltage utility lines and towers.

Precedent and the future - this EIR does not address our concerns for the future. They seem to think it will only operate like this for only 30 years or so. Once this project is approved, this land and surrounding land will forever be designated as utility scale/industrial land, with potentially a large switch station ready for the next project. This is exactly what happened with the Sunrise Power Link. They say, oh don't worry, it will just be these few power lines. Now there are 6 renewable projects planned for this area, and more to come, in order to use that infrastructure. Each project brings more projects and sets a precedent. This project sets the precedent that the back country does not matter, even if there is a TOWN right there. You can just put them ANYWHERE. You can even surround a rural village with them. There is no need for a real buffer since there are only 500 residents living there. Really, you can do anything, who cares!? As long as its 'green'. This is a stereotypical greenwashing over the real impacts of destroying a local community. If you can put an industrial-scale utility project here, you can literally put one anywhere after this. I think this is one of the biggest issues with this project and its regional impact beyond the Mountain Empire Region.

Please help me understand how this project can conform with the long list of general plan policies as stated in the DEIR that focus on mitigating any impacts on rural communities or their character.

Please just slow down and think this one through. Please make sure these developers are doing what is right for the community of San Diego and the greater Southern California region. We need renewable energy, but lets just put it somewhere that makes sense for everyone, not just where some foreign corporation finds the best deal.

Please let us keep what we have left of this beautiful and peaceful town. Let this town remain a historical landmark, a destination, a place for the whole region to enjoy with their families and future generations to come.

Please have this company address in the DEIR the REAL environmental impacts I outlined above with this project. As currently written, the DEIR overlooks and avoids what will really happen to Jacumba.

Sincerely,  
Jeff Osborne