

BOULEVARD PLANNING GROUP

PO Box 1272, BOULEVARD, CA 91905

DATE: 7-7-21

TO: San Diego County Planning Commissioners via: Ann.Jimenez@sdcounty.ca.gov ; cc: Nicholas.Koutoufidis@sdcounty.ca.gov

FROM: Donna Tisdale, Chair, Boulevard Planning Group; 619-766-4170; tisdale.donna@gmail.com

RE: July 9th Agenda Item #3: JVR Solar Energy Park Major Use Permit; PDS2018-MUP-18-022; PDS2018-ER-18-22-001

After a public discussion and review of project related documents at our regular meeting, held in person on July 1, 2021, our Boulevard Planning Group (BPG) voted unanimously 6-0-0 with Seat 1 vacant, to: “Authorize the Chair to submit a comment letter in opposition to the JVR Energy Park planned for Jacumba Hot Springs”.

These comments are brief due to the fact that there seems to be little to no respect or regard for public comments when it comes to sacrificing low-income rural communities for the benefit of so-called renewable energy developers and distant urban / suburban communities whose leaders sign Power Purchase Agreements prior to final environmental review or making site visits to see the real damage being done to our beloved Backcountry and those who live here.

1. Where is the Environmental Justice in this project? The so-called community benefits DO NOT justify the long-term harm the project represents for ground zero.
2. Please vote to deny approval of the FEIR, Statement of Overriding Considerations, CEQA Findings, and Staff Recommendations A & C.
3. Carefully manipulated wording in those documents cannot mitigate the vastly inadequate analysis of real world impacts that JVR Solar will inflict on the area.
4. Significant impacts remain despite alleged mitigation and will haunt this small community, a designated Colonia, now and for decades to come. It is a travesty.
5. Project Labor Agreements will not benefit Jacumba residents. The broader San Diego Community is 70 miles away and should not be credited as providing ‘local’ job benefits.
6. If you can’t find enough empathy or rationale to deny the project outright, please vote for the Jacumba Sponsor Group’s Equity for Jacumba Alternative.
7. At a minimum, vote for the Staff recommended Community Buffer. Both safety and compassion require a much bigger setback than originally proposed!
8. The Fire Protection Plan does not appear to include special foam or other similar equipment needed to suppress fires in Li-on Battery containers that produce clouds of toxic smoke that can roll over Jacumba, due to proximity to residents and businesses.

9. Recipients of JVR energy will not suffer through SDG&E's Public Safety Power Shutoff events while thousands of solar panels and battery storage containers and adjacent wind turbines hum noisily away next door, sending energy 70 miles west, while Jacumba residents sit in the dark.
10. Staff used almost 40 pages to respond to the BPG's previous well-documented comments /concerns (Response to Comment Letter 06) with the overall response being: *The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore no further response is required.*
11. For the Record, we strongly disagree and stand by our previous comments and concerns submitted on this project, which are incorporated here by reference.
12. **Failure to disclose:** It is our understanding from Jacumba Sponsor Group members that Christopher M. Brown is the consultant for project developer BayWa r.e. However, Mr. Brown (#782) is not listed / disclosed as such in the County of San Diego - Registered Lobbyists and Firms Represented list posted on the County website, dated Thursday, June 3, 2021¹
13. Nor is Mr. Brown listed in County of San Diego - Registered Lobbyists Sorted by Firms Represented as representing BayWa r.e Solar Project, LLC, or the JVR Energy Park, also dated June 3, 2021²
14. Mr. Brown has been lobbying for a long time. He should know the rules by now, and be held accountable for failure to do so.

Thank you for any review and consideration of these comments...

¹ <https://www.sandiegocounty.gov/cob/docs/lobbyists/firmsrepresented.pdf>

² <https://www.sandiegocounty.gov/content/dam/sdc/cob/docs/lobbyists/firmsrepresented-sorted.pdf>