

Response to Comment Letter I119

Beatrice Bachmeier

- I119-1** The commenter states, “We are a small, poor community here in Jacumba with most residents on SSI, SSDI or very limited income.” The commenter also states that the town has less than 600 residents who love the beautiful back country even though they have been dumped on for years with power lines, electrical grids, windmills and sexual predators to name a few of the inconsiderate industrial trash that they must now live. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I119-2** The commenter states that the JVR Energy Park can be placed anywhere and asks, “Why destroy our last slice of beauty in Jacumba and force us to live with increase heat in the summer from the ‘heat island effect.’” The commenter believes the Santa Ana winds will propel this heat and could increase the town’s heat by 39 degrees Fahrenheit. The commenter expresses concern that it was blistering hot last summer without this effect and requests to not increase the heat as global warming is already doing this. The commenter further states that this is the high desert not the low desert and it is hot day and night. In response, please refer to Global Response GR-2 Photovoltaic Heat Island Effects.
- I119-3** The commenter expresses concern that pesticides will be sprayed in the pristine air to maintain shrubs around the solar panels. The commenter states that we do not want this to occur. In response, mitigation measure **M-BI-8** in the Final EIR has been revised to clarify that no pesticides will be used by the Proposed Project.
- I119-4** The commenter states that the JVR Energy Park will hum and take away the peace and quiet. In response, the Acoustical Assessment for the JVR Energy Park Project (Appendix M) and Section 2.9 Noise of the Draft EIR analyzed the Proposed Project’s construction and operational impacts to sensitive land uses located within the vicinity of the Project site. The Draft EIR includes mitigation measures **M-NOI-1 through M-NOI-3** to mitigate noise impacts below a level of significance.
- I119-5** The commenter states that the JVR Energy Park will disrupt wildlife and cause irreparable environmental damage. In response, Section 2.3, Biological Resources analyzes the Project’s impacts to wildlife and habitat. The Draft EIR concludes that the placement of fencing and the solar facility within the Project site could disrupt the visual continuity of the Project site as a wildlife movement corridor. This impact is identified as potentially significant (**Impact BI-WLC-2**.)” Mitigation measure **M-BI-3** would reduce this impact to less than significant. Further, as discussed under in the

Draft EIR certain types of solar panels may create a “pseudo-lake effect,” and birds may collide with solar panels that appear like a body of water due to the sky’s reflection. However, there is little scientific information available regarding the pseudo-lake effect, and a detailed discussion of the impacts would be speculative. Further, the following factors would minimize the risk of collision due to sky reflection: (1) the project is not located near bodies of water that would attract wetland-associated birds; (2) the locale is not considered to be a major contributor to the Pacific Flyway; and (3) the solar units would be uniformly dark in color, coated to be non-reflective, and designed to be highly absorptive of all light that strikes their glass surfaces, and may not appear like water from above, as water displays different properties by both reflecting and absorbing light waves. Therefore, glare and pseudo-lake effect are deemed to be a low risk due to a number of factors, including the Proposed Project solar facility design and the Project site location.

With regard to habitat loss and fragmentation, the Draft EIR assessed both of these issues and determined that these impacts would be potentially significant (Impacts **BI-WLC-2** and **BI-W-6**). Implementation of mitigation measures would reduce this impact to less than significant: **M-BI-3** (habitat preservation), **M-BI-4** (RMP), **M-BI-8** (prevention of chemical pollutants), **M-BI-9** (prevention of invasive plant species), and **M-BI-10** (O&M signage).

- I119-6** The commenter states that the glare from JVR Energy Park will cause more heat and cause problems for the gliders who have come to Jacumba for a long time to enjoy the natural beauty. In response, please refer to Global Response GR-2 which discusses photovoltaic heat island effects. In regard to gliders, the Draft EIR considered first whether the Project proposes a development intensity, flight obstruction, or other land use that conflicts with the Jacumba Airport Land Use Compatibility Plan (ALUCP). As discussed in Section 2.6.2 of the Draft EIR, the County adopted the ALUCP specifically for the Jacumba Airport in December 2006 and amended the plan in 2011. Among other things, the ALUCP was adopted to protect the Jacumba Airport from encroachment by new incompatible land uses that could restrict their operations. Accordingly, the Draft EIR did not fail to consider usage of the Jacumba Airport by gliders because the Draft EIR relied on analysis in the ALUCP, which is specific to the Jacumba Airport and thus takes into accounts its glider uses. Further, the Glare Study for the Proposed Project prepared by POWER Engineers in 2018 (See Appendix A to Appendix B, Visual Resources Report in the Draft EIR) analyzed potential glare impacts for each potential approach to the only runway located at the Jacumba Airport in accordance with FAA guidelines. To ensure that analysis adequately encompassed glider operations, the Proposed Project applicant and POWER Engineers discussed glider operations at the Jacumba Airport with Alasdair Mullarney, Director of

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Operations, Associated Glider Club of Southern California, and prepared an updated technical analysis of the Proposed Project’s glare impacts using the information gathered. The 2021 Glare Study replaces the 2018 study in full in the Final EIR. As discussed in the 2021 Glare Study (Appendix A to the Visual Resources Report in the Final EIR) and Global Response GR-5, Airport Impacts, the Proposed Project is not expected to have a glare impact to glider operations at the Jacumba Airport.

I119-7 The commenter states these are only a few of the reasons why residents do not want the JVR Energy Park and invites readers to come to Jacumba and spend the day to see how the project will destroy all that is unique and special about the area. The commenter again invites the reader to spend the day in the hot springs and take a hike anywhere around town. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.

I119-8 The commenter states that Jacumba does not benefit from this project. The commenter then requests a response and explanation as to how this project affects the environment and why the applicant can justify putting this project so close to 600 residents who will not benefit and will only suffer from this project. In response, please refer to Chapters 2 and 3 of the EIR for an analysis of Proposed Project’s potential impacts to the environment. In addition, Section 4.2.4 of Chapter 4, Project Alternatives, of the Draft EIR discusses alternative locations for the Project that were considered but rejected. The Draft EIR rejected the Alternative Locations Alternative because there “are no other known readily available parcels of undeveloped land of similar size in the eastern portion of the County that could accommodate development of the Proposed Project that have not already been considered and rejected for development of a similar solar project, provide adequate site accessibility, and/or could be acquired by the Applicant within a reasonable period of time.” Also, please see Global Response GR-6 Alternatives in the Final EIR.

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