

**From:** [Bri Fordem](#)  
**To:** [Harris, Susan](#)  
**Cc:** [Julie Gerson](#)  
**Subject:** ABF Comments: JVR Energy Project  
**Date:** Monday, December 07, 2020 3:33:00 PM  
**Attachments:** [image001.png](#)  
[2020 ABF-JVR Comment Letter.pdf](#)

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Dear Susan,

Please accept the attached letter for consideration by the County of San Diego and the JVR Energy Park project applicant as comments submitted on behalf of Anza-Borrego Foundation, the partner organization to Anza-Borrego Desert State Park, for inclusion in the project's environmental impact report.

Many thanks for the opportunity to comment.

Bri

Bri Fordem  
Executive Director  
theABF.org  
O. 760-465-2601





December 7, 2020

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

Via Electronic Mail: [Susan.Harris@sdcountry.ca.gov](mailto:Susan.Harris@sdcountry.ca.gov)

Project Name: JVR Energy Park  
PDS2018-MUP-18-022  
SCH No. 2019039044  
Log Number: PDS2018-ER-18-22-001

To County of San Diego Staff, Nicholas Koutoufidis, and Susan Harris,

Anza-Borrego Foundation, the cooperating partner with Anza-Borrego Desert State Park, appreciates the opportunity to comment on the proposed JVR Energy Park project in view of our mission to protect and preserve the natural landscapes, wildlife habitat, and cultural heritage of Anza-Borrego Desert State Park for the benefit and enjoyment of present and future generations.

O4-2

We support the recommendations put forward by our partners at the Colorado Desert District of California State Parks to help mitigate the significant negative environmental impacts to the Jacumba area, should this project move forward. Support for access and infrastructure in this area of the Park with long term funding for improved recreational facilities would be a wonderful opportunity to give back to this underserved community. The southern entrance to Anza-Borrego Desert State Park, off of Interstate 8 near Jacumba Hot Springs, lacks a formal entrance or visitor center. As part of mitigation efforts, JVR Energy Project could build an alternative energy interpretive center that would be donated to California State Parks, along with the adjacent land for incorporation into Anza-Borrego Desert State Park to be remodeled as a visitor center when the energy project is decommissioned. This would benefit the Park as well as the town of Jacumba Hot Springs by providing increased visitation to the area.

O4-3

O4-4

We would also like to provide information from our original comment letter, dated April 8, 2019 for inclusion in the final record of the JVR Energy Park Environmental Impact Report.

O4-5

In 2007, The Nature Conservancy purchased 1,080 acres near Jacumba Hot Springs 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.

O4-6

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:

O4-7

- 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

O4-8

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.

O4-9

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.

O4-10

Please keep us informed as the planning process continues.

O4-11

Sincerely,



Bri Fordem  
Executive Director  
Anza-Borrego Foundation