

Response to Comment Letter O4

Anza-Borrego Foundation

- O4-1** The comment is a cover email to the attached letter submitted on behalf of the Anza-Borrego Foundation, the partner organization to Anza-Borrego Desert State Park. In response, the comment is an introduction and does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O4-2** The commenter states the Anza-Borrego Foundation, the cooperating partner with Anza-Borrego Desert State Park, appreciates the opportunity to comment on the Proposed Project in view of the Foundation’s 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. In response, the comment is an introduction and does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O4-3** The commenter states the Anza-Borrego Foundation supports 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. The commenter further states that 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. In response, the commenter is referencing recommendations presented in the comment letter submitted by the California Department of Parks and Recreation (CDPR) regarding the Draft EIR; please refer to Agency comment letter A3. Please refer to Response to Comments A3-6 through A3-10 regarding CDPR’s recommendations.
- O4-4** The commenter states that the southern entrance to Anza-Borrego Desert State Park, off of Interstate 8 near Jacumba Hot Springs, lacks a formal entrance or visitor center. The commenter further states as part of mitigation efforts, the Proposed 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. In response, the County does not consider a visitor center as mitigation for impacts to natural and/or cultural resources under CEQA. Please also refer to Response to Comment A3-10.

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- O4-5** The commenter states the Anza-Borrego Foundation would like to provide information from their comment letter dated April 8, 2019 for inclusion in the final record of the JVR Energy Park EIR. In response, the Anza-Borrego Foundation comment letter dated April 8, 2019 regarding the Notice of Preparation (NOP) for the EIR is included in its entirety in Appendix A of the EIR. Also, please refer to Responses to Comments A4-6 thru A4-10.
- O4-6** The commenter provides background information regarding the purchase of 1,080 acres by the Nature Conservancy adjacent to the project area and the subsequent transfer of title to the Anza-Borrego Foundation. In response, the comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O4-7** The commenter states development in the San Diego border region fragments habitat and threatens wildlife corridors between these communities. In response, the comment refers generally to development in the border region and does not raise a specific issue regarding the analysis of the Proposed Project in the EIR. Nonetheless, Section 2.3 Biological Resources of the Draft EIR analyzes the Proposed Project’s impacts to plant and animal communities, wildlife movement and corridors. Please also refer to Global Response GR-3 Biological Resources.
- O4-8** The commenter states in a 2007 report the Conservation Biology Institute identified three objectives of the 2007 acquisition by the Nature Conservancy, which include conserve habitat for the Quino checkerspot butterfly, buffer the entrance to Carrizo Gorge which provides a water source for Peninsular big horn sheep, and build a connection between the Carrizo Gorge in ADBSP and the international border to maintain landscape-scale connectivity functions. In response, the comment addresses objectives for the acquisition of land to the west of the Project area. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- O4-9** The commenter states in light of the objectives for the 2007 acquisition, 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. In response, the Proposed Project’s impacts to biological resources are thoroughly analyzed in Section 2.3 Biological Resources and the Biological Resources Technical Report (Appendix D) of the EIR. All potentially significant impacts to biological resources would be mitigated to less than significant with implementation of mitigation measures.
- O4-10** The commenter states the CEQA Initial Study does not list recreation as being impacted by this Project. The commenter further states 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. In response, Section 3.1.5 Parks and Recreation of the Draft EIR presents an analysis of the Proposed Project's impacts based on the significance criteria set forth in Appendix G of the CEQA Guidelines. The criteria states a significant impact would occur if the Proposed Project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. As discussed in Section 3.1.5, construction workers would be working in the area temporarily and the Proposed Project would be an unstaffed facility. Thus, the Proposed Project would not contribute to an increase in demand for parks and recreation services resulting in substantial physical deterioration of facilities. The criteria also states a significant impact would occur if the Proposed Project would include recreational facilities or require the construction or expansion of recreational facilities which would have an adverse effect on the environment. The Proposed Project would not include or require construction or expansion of any recreation facilities; thus, no impacts would occur. Therefore, based on the criteria set forth in Appendix G for Parks and Recreation, the Proposed Project would not result in significant impacts.

Regarding the Proposed Project's impacts to recreation potential on adjacent State Park land, the development footprint would not be located immediately adjacent to State Park land. As shown on Figure 2.3-8 Potential Mitigation Areas in the Draft EIR, biological mitigation areas are proposed along the western boundary of the Project site. A biological open space easement would be required for the mitigation areas.

Regarding impacts to scenic vistas, Section 2.1 Aesthetics and the Visual Resources Report (Appendix B) of the EIR include an analysis of impacts to scenic vistas, including views from Anza-Borrego Desert State Park. Figure 2.1-15 of the Draft EIR includes a photo of the existing view from State Park land (Key View 7) and a visual simulation of the Proposed Project. As discussed in Section 2.1.3.3 Focal or Panoramic Vistas, impacts to panoramic vistas available from State Park lands west of the Project site would be potentially significant (**Impact AE-6**). The EIR includes mitigation measures to reduce visual impacts; however, **Impact AE-6** would not be reduced to less than significant. Thus, the Proposed Project's impacts to panoramic vistas from State Park lands west of the Project site would remain significant and unavoidable.

- O4-11** The commenter requests the Anza-Borrego Foundation be kept informed as the planning process continues. In response, the Anza-Borrego Foundation has been included on the notification list for future public meetings before the Planning Commission and the County Board of Supervisors regarding the Proposed Project.

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