

From: [Jimenez, Ann](#)
To: [Koutoufidis, Nicholas](#)
Subject: FW: CLMPG advice for planning commissioners, Jacumba Valley Ranch industrial solar
Date: Thursday, July 08, 2021 3:36:18 PM
Attachments: [Jacumba solar, Billie Jo Jannen.pdf](#)

Thank you,

Ann Jimenez | She-Her-Hers
Planning Commission Secretary
County of San Diego, Planning & Development Services
5510 Overland Avenue, Suite 310 San Diego, CA 92123
C: (619) 517-4193

Please note: I will be teleworking M/Tu/Th and in-office on W/F.
I am accessible by e-mail, cell phone. In-person, and MS Teams.
My work hours are 7am-3:30pm M-F.

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-----Original Message-----

From: campoplanninggroup@nym.hush.com <campoplanninggroup@nym.hush.com>
Sent: Thursday, July 8, 2021 2:42 PM
To: Jimenez, Ann <Ann.Jimenez@sdcounty.ca.gov>
Subject: CLMPG advice for planning commissioners, Jacumba Valley Ranch industrial solar

Please ensure that all commissioners receive a copy of this letter before tomorrow.

Thanks

Billie Jo Jannen, Chairman
Campo Lake Morena CPG

From: Billie Jo Jannen, Chairman, Campo Lake Morena Community Planning Group

To: San Diego County Planning Commission Planning Commission: Ronald Ashman, Douglas Barnhart, Yolanda Calvo, Michael Edwards, Ginger Hitzke, Tommy Hough and David Pallinger

July 8, 2021

Re: The Equity for Jacumba Alternative; Jacumba Valley Ranch industrial solar array

Dear Commissioners:

I chair the Campo Lake Morena CPG. We have been unable to meet on our regular schedule due to medical absence by a member we need present to have a voting quorum. Therefore, the group has not met to vote specifically on the Jacumba solar project. We HAVE, however, voted on many past comments regarding industrial solar. Today, I am sharing excerpts from our already-adopted language that are germane to discussions of social justice and permanent harm to sequestration of greenhouse gases connected with all solar projects in general.

Justice and equity for a politically impotent minority

Both the Board of Supervisors and the Planning Commission have a duty to balance fairness and social justice of projects that are proposed only for the interests of the state. The potential for social and financial harm from renewables is very high. Small rural towns cannot defend themselves at the polls, so it is the responsibility of our representatives to stand up for us. This is the right thing to do.

From our January 1, 2021 comment on renewable streamlining and proposed energy overlay project: *“This project raises the issue of social justice for our small population vs the dense urban population who would receive all the benefits. Social justice is considered important enough by the state and county that it is currently being addressed as a general plan update. Our communities can neither fight back, nor access the power generated by this project. We are forced to take all the negatives and receive zero benefit from them. We are a politically defenseless minority, which has made us the target of a number of perfectly awful proposals by politicians who know we haven’t the power to vote them out of office. What’s more, according to the county’s own calculations in the social justice update, Campo and most of the backcountry is teetering on the brink of incomes and pollution levels that make them a social justice concern, even before vast fields of other people’s industrial energy production are thrust upon them.”*

Please don’t just shrug and take the attitude that “you have to break a few eggs” in order to move forward. These are people’s lives we’re talking about here, and there are far better ways for the state to promote the use of renewables than to spend billions in tax benefits

and easy permitting for giant foreign corporations who have no stake in the health and financial wellbeing of our community members. If you don't care, who will?

Inadequate calculations of greenhouse gas

Project developers have very little upon which to base their calculations without area-specific numbers on what is being sequestered in chaparral range and wildland, and SDC staff has done nothing to obtain analysis or suggest better sources for it. Using the boilerplate numbers provided by Natural Resources Defense Council and International Panel on Climate Change doesn't work because they have measured lands that are drastically different from our backcountry. In fact, **any EIR that relies on pasture or forest numbers to compute permanent GHG releases on chaparral lands should be rejected out of hand.** Computations should come from specific measurements on the types of land and vegetation we have here.

In a March 14, 2019 comment letter on the Boulder Brush NOP, CLMPG wrote: *“Wildland and agricultural scientists have been studying soil sequestration **for over 30 years**, and work has become intensive in recent years. Methods of physical measurement and quantification have been refined and there is not a single reason – other than simple disinclination -- for county staff to neglect consulting with these experts. Some of these researchers are located right here in San Diego County. At what point is the science “old” enough to be used for practical purposes?*

According to research on carbon sequestration in arid biomes, soil sequestration – and not surface vegetation – is the greater part of local greenhouse gas-holding capacity. The Food and Agriculture Organization of the United Nations writes: “In dryland environments, soil organic carbon in the first 100 cm soil amounts to about 4 tons/hectare.” <http://www.fao.org/3/y5738e/y5738e07.htm#TopOfPage>

Subsoil biological agents – mostly bacteria – sequester this carbon and are permanently destroyed when the soil is disturbed. <https://phys.org/news/2014-04-arid-areas-absorb-unexpected-amounts.html>.

According to the 2014 study “Spatial Distribution of Soil Organic Carbon and Its Influencing Factors in Desert Grasslands of the Hexi Corridor, Northwest China,” arid regions worldwide contain 40 times more carbon than what has been released due to human activity, adding, “soils in these regions are fragile and may experience degradation, desertification, wind erosion, and overgrazing. Small changes in soil conditions can modify the original balance of soil carbon cycle, increase the C loss from soil, and release more greenhouse gases into the atmosphere. Therefore, SOC storage in the desert-grassland ecosystem is a critical component of global C cycle and has a considerable effect on reducing the rate of enrichment of atmospheric CO₂.” <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3986398/>

Unimpaired natural systems will not only hold the carbon they have, but will hold even more as atmospheric CO₂ increases, making them an irreplaceable GHG-buffering resource. www.currentscience.ac.in/Volumes/106/10/1357.pdf”

From the January 1, 2021 CLMPG comment on the county's streamlining and energy overlay project: *"There is no going back, once sequestration is destroyed. Also permanent are the massive releases of GHGs and other pollutants to build wind turbines and solar panels. In China, the mining of rare earths alone has permanently destroyed vast tracts of farmland and sickened thousands of people. Fabrication pollution is as ignored as lost sequestration while we pat ourselves on the back for being so wonderfully "green."*

Without proper quantification of ALL impacts, we do not honestly know if these technologies are solving the problem of climate or making it even worse. The fact that these impacts take place in other states and countries is no reason to look the other way. Pollution doesn't recognize borders."

Please stop allowing solar and wind developers to get away with sloppy, minimal evaluations of these important considerations. Please stop approving these developments just to measure up to arbitrarily set goals or partisan ideas about climate change and the environment. Satisfying some standard set by the state is not more important than looking out for the people and wildlife that you help to govern. Please exercise the duty of care you owe to the people who live in our rural communities.

Sincerely



Billie Jo Jannen
619-415-6298