

From: [Jimenez, Ann](#)
To: [Koutoufidis, Nicholas](#)
Subject: Fwd: [External] August 18, 2021 Agenda Item #1: Comment Letter re Jacumba Solar Project / JVR Solar - PDS2018-MUP-18-022
Date: Saturday, August 14, 2021 2:56:55 PM
Attachments: [Jacumba Comment Letter.pdf](#)

FYI.

Thank you,

Ann Jimenez
(619) 517- 4193

From: David Garmon <jdgarmon@me.com>
Sent: Saturday, August 14, 2021 4:48:05 PM
To: Fletcher, Nathan (BOS) <Nathan.Fletcher@sdcounty.ca.gov>; Lawson-Remer, Terra <Terra.Lawson-Remer@sdcounty.ca.gov>; Vargas, Nora <Nora.Vargas@sdcounty.ca.gov>; Desmond, Jim <Jim.Desmond@sdcounty.ca.gov>; Anderson, Joel <Joel.Anderson@sdcounty.ca.gov>; FGG, Public Comment <PublicComment@sdcounty.ca.gov>
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Subject: [External] August 18, 2021 Agenda Item #1: Comment Letter re Jacumba Solar Project / JVR Solar - PDS2018-MUP-18-022

Dear Supervisors,

Please accept the attached comment letter on behalf of the Tubb Canyon Desert Conservancy regarding the JVR Energy Park Major Use Permit that you will be considering on August 18th.

Thank you,

David Garmon, M.D.
President and Founding Director
Tubb Canyon Desert Conservancy
(619) 787-9121
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To: **County of San Diego, Board of Supervisors**
1600 Pacific Highway, #335
San Diego, CA 92101

Date: 10 August 2021

Re: Opposition to the Jacumba Solar Project / JVR Solar - PDS2018-MUP-18-022

Dear Supervisor Jim Desmond and the San Diego County Board of Supervisors,

The Tubb Canyon Desert Conservancy (TCDC) was established to preserve desert habitat and biodiversity, to protect native plants and wildlife, and to promote understanding of these special places. TCDC focuses on the importance of natural desert ecosystems existing in harmony with established desert communities. We believe this balance is in the long-term best interest of residents and businesses in San Diego County. The proposed **Jacumba Solar Project (JVR Solar – PDS2018-MUP-18-022)** seriously threatens this balance for the unincorporated community of Jacumba and the surrounding Sonoran Desert habitat.

We stand with the many residents of the small town of Jacumba who oppose the proposed Jacumba Solar Project at any scale because of the damage it would inflict on this small community's economic future. The industrial-scale solar facility as currently planned would be a visual blight located in too close proximity to rural homes. This adverse impact *cannot be mitigated*. The heat island effect the proposed project would generate, along with the massive and ongoing water required to maintain the output of photovoltaic panels, would threaten Jacumba's future ability to draw economically on seasonal tourism once construction begins and for the lifetime of the proposed project -- followed by any renewals of the project -- into the indeterminate future. Jacumba is an economically disadvantaged community whose residents have few resources to effectively oppose such an intrusive development that would jeopardize their well-being. Based on discussions with an organization representing Jacumba residents, **we believe that imposing the Jacumba Solar Project on their community would constitute economic and environmental injustice.**

Tubb Canyon Desert Conservancy

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TCDC enthusiastically supports development of new solar generating capacity when installed on existing structures at, or close to, the point of use. Like thousands of San Diego County residents, and millions of tourists from around the world, we view any natural desert viewshed, watershed and ecosystem as valuable. Viewsheds, ecosystems, aquifers, and associated natural flora and fauna are all valuable resources that should not be sacrificed for some other “higher purpose.” Such a “higher purpose” is often in the eyes and pocketbook of a clever, typically non-resident “investor” who hopes to make a handsome profit without considering the devastating cost to nearby long-term residents. The economic term for impacts on others is “externalities,” that is, impacts that cost the investor nothing, but which costs are born by those external to the funding for, and revenue from, a particular endeavor. It is particularly easy for a shrewd out-of-town developer to “roll over” the interests of long-term, low-income local residents, especially Native peoples and other peoples of color, veterans, and seniors. Developers know the decision-makers, and sometimes make handsome campaign contributions. All these advantages are typically out of reach for rural townspeople who depend on the local natural beauty for their livelihood and their rural location for their physical and mental health.

At first glance, massive solar panel arrays in the desert seem to make a lot of sense. However, the factors of temperature, transmission distance, and the water resources needed to keep panels clean, all need to be accounted for in order to calculate the true economic and societal benefit of any particular installation. Electrical generation near the point of use—on residential, warehouse, parking lot, and other developed land and structures—is typically the best choice in Southern California. The biggest benefit of a desert location for solar panels is the high percentage of direct sunshine while the sun is up, compared to communities under coastal influence having greater fog and cloud cover. This advantage is offset by the fact that solar cells lose efficiency as ambient and surface temperatures increase. In the desert, surface temperatures on the ground and on solar panels of more than 150°F can be experienced daily during summer and autumn months. **Because solar panel efficiencies begin to fall when surface temperatures exceed 60 – 70°F, more than a quarter of a solar panel’s efficiency can be sapped during the high desert temperatures** that frequently exist between ~10:00AM to ~5:00PM when the sun is providing the most illumination onto solar panels. Averaged over a year, this effect can eliminate some, if not all, of the advantage provided by the fact there are more cloud-free days in the desert versus coastal regions in Southern California.

Solar panel farms also create local heat islands when winds are relatively calm. While solar panels generate electricity from the sunlight they absorb, only a fraction of this energy is exported off-site through wires as electricity; **the majority of the energy remains on-site because solar panels at best convert to electricity only about one-third of the solar energy they absorb.** Solar panels are darker than most desert terrain (except for lava fields in a few locations), thus they absorb more energy than typical natural desert surfaces in Southern California. So, the problem of heat is two-fold. First, the heat effect reduces solar panel efficiency as noted above. Second, to the extent the proposed industrial-scale solar farm creates a heat island in a community where ambient summer temperatures ordinarily exceed 110°F, this heat island effect could pose a serious danger for those residents living near the proposed facility. No solar energy generating project should increase health risks and decrease property values for those living and working around it.

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Finally, the dry desert presents two more problems for solar panels. First, there are **frequent wind-borne dust events that leave deposits on solar panels that reduce their efficiency by as much as 40%**. Frequent cleaning can reduce these losses, but that cleaning requires *water*, which, by definition, is in short supply in the desert. **An industrial-scale solar panel farm can require as much water for cleaning panels to maintain efficiency (insofar as that is possible when panels are hot) as all the water used by a small community.** Depending on the local hydrology, the water draw for cleaning solar panels could hasten the decline of the local water table, requiring local residents to drill deeper wells, if they can afford to, in order to maintain access to water they have had for decades. The alternative of “trucking in water” adds cost, damages roads, increases air pollution, and adds tanker truck traffic and noise to an otherwise quiet and peaceful small town.

Lastly, siting the proposed Jacumba Solar Project in the middle of a desert floodplain and riparian habitat susceptible to both flash floods and strong seismic events, and located adjacent to Anza-Borrego Desert State Park and BLM lands, both of which harbor several endangered and declining species, is a patently bad idea for all the obvious reasons that have been elaborated by others.

Thank you for consideration of this request to *deny* approval of the proposed Jacumba Solar Project, for the sake of the small community of Jacumba and the larger issues raised here, including that of grid reliability and security, reduction in wildfire risk, and to protect desert lands, wildlife and scenic vistas.

Sincerely,



J. David Garmon, MD
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CC:

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San Diego Union Tribune

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