

**From:** [Slovick, Mark](#)  
**To:** [Flannery, Kathleen](#); [Smith, Ashley](#)  
**Cc:** [Brown, Bronwyn](#); [Koutoufidis, Nicholas](#)  
**Subject:** RE: [External] Comment letter on Jacumba Solar Project for August 18 Board meeting from SD Audubon Society  
**Date:** Tuesday, August 17, 2021 1:55:53 PM

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Thanks Ashley, I'll send this response to Emily and cc you and LUEG.

Thanks,

Mark Slovick, Deputy Director  
County of San Diego | Planning & Development Services  
T. [619.517.8067](tel:619.517.8067)

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**From:** Flannery, Kathleen <[Kathleen.Flannery@sdcounty.ca.gov](mailto:Kathleen.Flannery@sdcounty.ca.gov)>  
**Sent:** Tuesday, August 17, 2021 1:46 PM  
**To:** Smith, Ashley <[Ashley.Smith2@sdcounty.ca.gov](mailto:Ashley.Smith2@sdcounty.ca.gov)>; Slovick, Mark <[Mark.Slovick@sdcounty.ca.gov](mailto:Mark.Slovick@sdcounty.ca.gov)>  
**Cc:** Brown, Bronwyn <[Bronwyn.Brown@sdcounty.ca.gov](mailto:Bronwyn.Brown@sdcounty.ca.gov)>; Koutoufidis, Nicholas <[Nicholas.Koutoufidis@sdcounty.ca.gov](mailto:Nicholas.Koutoufidis@sdcounty.ca.gov)>  
**Subject:** RE: [External] Comment letter on Jacumba Solar Project for August 18 Board meeting from SD Audubon Society

Looks good...just suggested three minor edits (in red/strikeout).

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**From:** Smith, Ashley <[Ashley.Smith2@sdcounty.ca.gov](mailto:Ashley.Smith2@sdcounty.ca.gov)>  
**Sent:** Tuesday, August 17, 2021 1:32 PM  
**To:** Slovick, Mark <[Mark.Slovick@sdcounty.ca.gov](mailto:Mark.Slovick@sdcounty.ca.gov)>  
**Cc:** Flannery, Kathleen <[Kathleen.Flannery@sdcounty.ca.gov](mailto:Kathleen.Flannery@sdcounty.ca.gov)>; Brown, Bronwyn <[Bronwyn.Brown@sdcounty.ca.gov](mailto:Bronwyn.Brown@sdcounty.ca.gov)>; Koutoufidis, Nicholas <[Nicholas.Koutoufidis@sdcounty.ca.gov](mailto:Nicholas.Koutoufidis@sdcounty.ca.gov)>  
**Subject:** RE: [External] Comment letter on Jacumba Solar Project for August 18 Board meeting from SD Audubon Society

Hey Mark,

Sorry for the delay. Here is some info in response the the Audobon letter that we can share with Emily. If they would like to add the additional years of monitoring to the RMP for the open space I included a brief statement thy could add to a motion at the bottom.

Thanks,

Ashley

- The comment letter states that the RMP should be expanded to include the solar panel and buffer areas and that it should include invasive weed control and prevent vegetation from being removed in its entirety in these areas.

RMPs are for perpetual management and monitoring of open space areas so, **since this is an interim facility**, it would not be appropriate to add the solar panel and buffer areas to the RMP. However, the Major Use Permit (MUP) does include conditions [here](#) (pages B-21 and B-106 and B-123) that require that the project use non-invasive plant species adjacent to open space. In addition, the MUP also includes an ongoing condition throughout the term of the permit that requires that at least 70% vegetation cover be maintained during project operation on the portions of the solar facility development footprint within the perimeter fencing not overlain by vehicle access driveways and internal access, inverter/transformer platforms, battery storage containers, the substation, and the switchyard facilities to provide dust control and minimize erosion during project operation. These areas are to be reseeded with a native hydroseed mix and will be reviewed by the County biologist for compatibility with native habitats in the project area. The vegetation is required to be kept at 6 inches for fire control purposes.

- The comment letter also states that ongoing monitoring for the tri-colored blackbird should be completed before construction, during construction and after construction for a period of 16 years to collect scientific data on the interactions between tri-colored blackbird and solar panels.

A survey of the site was completed and observations of all plant and wildlife species were recorded on Figure 4-3 of the [Biological Resources Report](#) (page 181 of 480 of the pdf).

The RMP condition [here](#) (pages B-18 and B-19) does include a provision that tri-colored blackbird monitoring be included as part of the RMP. The conceptual RMP currently specifies that monitoring will occur four times (2 per year during nesting season for 2 years). This monitoring would occur in the proposed open space. The board would have the discretion to require that the RMP condition be updated to require a longer period of monitoring for the tri-colored blackbird. The Board would also have the discretion to increase the buffer in the southeastern portion of the site where the commenter notes tri-colored blackbirds have been recorded foraging.

If the Board wishes to add additional monitoring for the tri-colored blackbird we would suggest adding the following to the motion:

In condition 15 (Resource Management Plan) in the Major Use Permit Form of Decision, add that ongoing monitoring of tri-colored blackbird shall occur one out of every four years for a period of 16 years during the operation of the project, in addition to the two surveys each year for the first two years of operation.

**From:** Slovic, Mark <[Mark.Slovick@sdcounty.ca.gov](mailto:Mark.Slovick@sdcounty.ca.gov)>  
**Sent:** Monday, August 16, 2021 2:31 PM  
**To:** Smith, Ashley <[Ashley.Smith2@sdcounty.ca.gov](mailto:Ashley.Smith2@sdcounty.ca.gov)>  
**Cc:** Flannery, Kathleen <[Kathleen.Flannery@sdcounty.ca.gov](mailto:Kathleen.Flannery@sdcounty.ca.gov)>; Brown, Bronwyn <[Bronwyn.Brown@sdcounty.ca.gov](mailto:Bronwyn.Brown@sdcounty.ca.gov)>; Koutoufidis, Nicholas <[Nicholas.Koutoufidis@sdcounty.ca.gov](mailto:Nicholas.Koutoufidis@sdcounty.ca.gov)>  
**Subject:** FW: [External] Comment letter on Jacumba Solar Project for August 18 Board meeting from SD Audubon Society

Ashley, please see the attached and comment below from Emily. Can you review and let me know if we can add this like she references below?

Thanks,

Mark Slovic, Deputy Director  
County of San Diego | Planning & Development Services  
T. [619.517.8067](tel:619.517.8067)

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**From:** Wier, Emily <[Emily.Wier@sdcounty.ca.gov](mailto:Emily.Wier@sdcounty.ca.gov)>  
**Sent:** Monday, August 16, 2021 1:28 PM  
**To:** Slovic, Mark <[Mark.Slovick@sdcounty.ca.gov](mailto:Mark.Slovick@sdcounty.ca.gov)>  
**Subject:** FW: [External] Comment letter on Jacumba Solar Project for August 18 Board meeting from SD Audubon Society

Mark, can we chat about some of the comments brought up by Audubon? Curious about whether we could make some of these changes to the RMP. I presume Tricolored Blackbirds would not be in this area anymore, but perhaps we could add in a specific study for them prior to construction?

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**From:** Jim Peugh <[peugh@cox.net](mailto:peugh@cox.net)>  
**Sent:** Monday, August 16, 2021 12:35 PM  
**To:** [publiccomment@sdcounty.ca.gov](mailto:publiccomment@sdcounty.ca.gov).  
**Cc:** Wier, Emily <[Emily.Wier@sdcounty.ca.gov](mailto:Emily.Wier@sdcounty.ca.gov)>; Megan Flaherty <[flaherty@sandiegoaudubon.org](mailto:flaherty@sandiegoaudubon.org)>; Lesley Handa <[lesley.handa@gmail.com](mailto:lesley.handa@gmail.com)>; 'Muriel Spooner' <[m Spooner@san.rr.com](mailto:m Spooner@san.rr.com)>  
**Subject:** [External] Comment letter on Jacumba Solar Project for August 18 Board meeting from SD Audubon Society

Hello SD County,  
Please distribute the attached letter to each Supervisors for the agenda item on the Jacumba Solar Project for the August 18 Board of Supervisors meeting.  
Thanks,  
Jim Peugh  
Conservation Chair  
San Diego Audubon Society

Fostering the protection and appreciation



of birds, other wildlife, and their habitats...

San Diego County Board of Supervisors  
1600 Pacific Highway, Fourth Floor, Room 402  
San Diego, California 92101  
Via email: [publiccomment@sdcounty.ca.gov](mailto:publiccomment@sdcounty.ca.gov)

August 15, 2021

**Re: Jacumba Valley Ranch Solar Project comments for August 18, 2021 Board of Supervisor's meeting**

Dear San Diego County Supervisors,

San Diego Audubon Society recognizes that climate change is an existential threat to people, birds, other wildlife and their habitats worldwide. In San Diego County, human development fragments and impacts habitats every day. This project could certainly help to reduce our regions contribution to climate change. Our comments are directed at allowing it do that while not significantly diminishing this area's important wildlife movement value and wildlife habitat value especially for some at-risk species.

**Resource Management Plan**

The Conceptual Resource Management Plan is useful, but should be expanded to include more items that are essential. There should be an RMP for the solar panel area, as well as for the buffer area. Changes to the lands in the buffer area and in the solar panel area could be very detrimental to local wildlife if not also managed well. This includes invasive weed control (which will also reduce the likelihood of wildfires), and ensuring that vegetation is not removed entirely, which could contribute to higher rates of erosion and would remove important resources for wildlife. The implementation of the RMP and the subsequent management of the buffer and solar areas would be the responsibility of the solar array operators.

Figure 5 in the Conceptual Resource Management Plan doesn't record any birds on the proposed solar project site, only in the easement area. Please provide a map of the species that were found in the area proposed for solar panels?

Burrowing Owls were observed overwintering in the Study Area. We urge that they be added to the RMP as a species that is monitored and managed. Burrowing Owls are ground nesting bird. Managing for them will help minimize the impact of losing the solar panel area as nesting or overwintering sites. They are on the decline in the County. Efforts should be made to encourage their occupation in the solar area as well as in the buffer area.

The RMP should be expanded to specify fencing and vegetation cover that would allow wildlife to move through and/or occupy the solar area as well as the buffer area.

The RMP should identify a lighting system that will allow nocturnal wildlife movement through both the solar and the buffer areas and that will not provide an unnatural advantage to nocturnal predators. To provide adequate security the lighting might need to be augmented by infrared, radar, or ground vibration sensor systems.

### **Tricolored Blackbirds**

San Diego Audubon urges that the environmental benefits of this project be improved by conducting a research project to better understand the effects of solar projects on Tricolored Blackbirds (*Agelaius tricolor*). Tricolored blackbirds are a listed species in the San Diego Management and Monitoring Plan. They are especially sensitive to loss of their breeding areas, which are characterized as areas that include open accessible water, a protected nesting substrate with flooded or thorny/spiny vegetation, and suitable foraging space within a few kilometers. It appears as though this area must meet these requirements, as they have used this area for over 50 years.

Little is known about the interactions between Tricolored Blackbirds and photovoltaic solar installations throughout the state. With the expansion of clean energy, we will see more installations of solar projects like this. This project can act as an important and informative source of information for future similar projects. This would be done by documenting the use by Tricolored Blackbirds before construction, vs. the use by Tricolored Blackbirds during construction, over the first two years of operation, and for one out of every four years after that for the first sixteen years of operation. It would require a monitoring protocol to be worked out by a research team, and would dovetail with the ongoing monitoring as well as that described in the existing RMP. We strongly encourage the applicant to set aside funding and time to support the collection of needed scientific information to help build, design and permit better photovoltaic projects in the future.

We also encourage the applicant to double the buffer width in the southeastern portion of the parcel, because this is where tricolored blackbirds have been recorded foraging and might be an important location for their continued existence in the Jacumba area.

### **Community Impacts**

We urge that the design, construction, and operation of this facility take all reasonable measures to not degrade the economic, quality of life, and health of the community and residents of Jacumba Hot Springs. If projects like this get a reputation of being more intrusive

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of birds, other wildlife, and their habitats...

than necessary, that reputation could make it more difficult for our region and our nation to take the measures needed to reduce our discharge of Green House Gases.

### **Community Solar**

The JVR project does not benefit the local community directly. The project should sponsor a grant and/or installation program to bring rooftop solar panels to the residents and businesses of Jacumba, if they are interested. Adding this environmental justice component to the project would improve it with very little downside. This would provide a tangible community benefit from the project and would provide more renewable energy and lower our carbon footprint.

### **Backup power for the surrounding community**

Power to our backcountry areas is occasionally shut-off because of power-line failures or to reduce fire risk. We urge that this solar installation include the capability to provide twenty-four hour power directly to the Jacumba Hot Springs area in situations where this community is not getting power from the rest of the grid.

### **Urban Siting for Solar Energy**

We urge that much greater effort and investment be put toward urban solar energy such as rooftop and parking lot solar facilities for a large number of environmental reasons. These urban sources do not require long transmission lines with their fire risks, environmental impacts from installation and maintenance, and Green House Gas emissions from installation, maintenance, and associated vehicle mileage. They do not take land that is important for wildlife habitat, recreation, and scenic value. They do not a labyrinth of service roads and staging areas, which degrade our watersheds. They do not require wind turbines, which also kill our declining populations of birds and bats in huge numbers. We urge that the County put a lot more pressure on the energy companies to address our green energy needs through urban roof-top and parking lot solar facilities.

Please notify San Diego Audubon about further updates, or major milestones on this issue. Thank you for your time and consideration.

Sincerely,

James A. Peugh  
Conservation Chair  
San Diego Audubon Society  
[peugh@cox.net](mailto:peugh@cox.net)

