

## Valle de Oro Community Planning Group

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Oday Yousif, *Chair*

Meeting Date:  
September 10, 2025  
Agenda Item: 6  
Distribution Date:  
September 8, 2025  
Batch No.: 05

August 13, 2025

**Via Email:** PublicComment@sdcounty.ca.gov

San Diego County Board of Supervisors  
c/o Clerk of the Board  
1600 Pacific Highway, Room 402  
San Diego, California 92101

**Subject: Cottonwood Sand Mine Project (PDS2018-MUP-18-023; PDS2018-RP-001)**

Dear Chair Lawson-Remer and Members of the Board of Supervisors,

I write to urge you to uphold the Planning Commission's disapproval of the Cottonwood Sand Mine Project (PDS2018-MUP-18-023; PDS2018-RP-001) and deny the Applicant's appeal in its entirety. As you are aware, this proposed project has generated overwhelming public opposition and poses substantial, long-term environmental, public health, and community harms—many of which are irreversible and fundamentally incompatible with the surrounding residential character of Rancho San Diego. Under San Diego County Zoning Ordinance §7358(a), (b), and (c), a Major Use Permit may only be granted if the following findings can be made based on substantial evidence:

1. Harmony in scale, bulk, coverage and density;
2. The availability of public facilities, services and utilities;
3. The harmful effect, if any, upon desirable neighborhood character;
4. The generation of traffic and the capacity and physical character of surrounding streets;
5. The suitability of the site for the type and intensity of use or development which is proposed;
6. Any other relevant impacts;
7. Consistency with the San Diego County General Plan; and
8. That the requirements of the California Environmental Quality Act have been complied with.

Even a cursory review of this list reveals that this invasive, industrial-scale project fails each of these findings on its face. The plain language of the code—when read honestly and without distortion—confirms that the Cottonwood Sand Mine is not a project that can lawfully or reasonably be approved.

While the County concluded that two of the required findings under §7358 could not be made, a straightforward application of the law reveals that none of the findings can be met. There is nothing harmonious about placing an industrial-scale sand mine in the heart of a residential community. The site is far from adequate public facilities and services. There is a clear and harmful effect on neighborhood character, evidenced not only by the content of the Final EIR but also by the overwhelming public opposition throughout this process.

The Applicant's own offer to improve nearby roadways is a tacit admission that the project will generate traffic impacts incompatible with the physical character and capacity of surrounding streets. The site is fundamentally unsuitable for this use—situated adjacent to homes, schools, and parks, in a neighborhood never intended to accommodate this level of disruption.

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The project is also clearly inconsistent with the County General Plan, including the Valle de Oro Community Plan and Rancho San Diego Specific Plan, which emphasize community character, environmental protection, and appropriate land use. The Applicant selectively cites pro-mining policies while ignoring those that safeguard residential neighborhoods and open space. Even the Final EIR—on which the Applicant heavily relies—identifies significant and unavoidable impacts, particularly to aesthetics and visual resources. These impacts go beyond paperwork—they affect real people, real neighborhoods, and public health. CEQA disclosure does not eliminate harm; it simply acknowledges it.

The Applicant’s appeal also raises several specific claims and justifications that warrant direct response. We address each of those points in the sections that follow.

## **1. Lack of Majority Vote Does Not Equate to Support**

The Applicant argues that the Planning Commission’s 3-3 split vote justifies the Board’s “independent” reconsideration and approval. However, under County Policy PC-2, a failure to secure four affirmative votes results in a disapproval—an outcome that is not a mere procedural technicality but a reflection of serious concerns and a lack of support on the merits. The Applicant now attempts to downplay that result, claiming it “lacks merit,” but this framing ignores the reality: if the project truly had merit, it would have secured the necessary votes. Instead, the Applicant failed to persuade a majority of the Commission, failed to address the hundreds of public comments in opposition, and failed to overcome the extensive debate and hesitation expressed by Commissioners. Now, they ask the Board to disregard all of that—community input, environmental concerns, and planning group recommendations—simply because they didn’t get their way. The appeal should not serve as a second bite at the apple to bypass the clearly demonstrated lack of consensus.

## **2. Alleged “Critical Need” for the Project is Overstated and Unsubstantiated**

While the Applicant emphasizes San Diego County’s aggregate needs, this argument fails to outweigh the project’s localized environmental and community impacts. The County’s demand for PCC-grade sand must be balanced against the imperative to protect sensitive residential neighborhoods, ecological resources, and recreational assets. The General Plan does not mandate mineral extraction at the expense of community well-being, nor does it support extractive uses that conflict with the surrounding context. The appeal fails to present or consider more sustainable, less disruptive alternatives—because doing so would expose that there is no genuine necessity for such aggressive and invasive land use within a residential area.

The Applicant’s economic argument is a thin veneer meant to distract from the project’s real consequences. They suggest that approval of this project will somehow solve San Diego’s housing crisis and infrastructure needs. But that is simply not true. Nothing in the proposed project requires that the extracted materials be sold locally, nor is there any condition that ensures the sand will be used for affordable housing or other community-benefiting projects. There is no mechanism to ensure that the supposed public benefits will ever materialize for the residents bearing the burdens. In reality, the only guaranteed outcome is a decade of industrial disruption imposed on a suburban community.

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## 3. Mischaracterization of Land Use and Zoning Context

The Applicant insists that the project is not “heavy industrial” and therefore compatible with nearby residential communities, but this is a distinction without a meaningful difference. Regardless of whether the Zoning Code technically classifies the use as “extractive” rather than “industrial,” the practical effect remains the same: a decade of excavation, screening, washing, hauling, and staging of materials—activities that will generate significant industrial-scale disruption. Just because the zoning code allows extractive use on paper does not mean that the Board is obligated to find the use appropriate in this specific location, especially when the surrounding context is overwhelmingly residential and suburban in nature. The Board retains full discretion to consider not just what is technically permissible, but what is actually compatible with the long-term character and health of the community.

Moreover, the Applicant’s claim that impacts will be limited because of a phased restoration process again glosses over the lived experience of residents. Even assuming that the Applicant meets every timeline and restoration milestone—a generous assumption—the community will endure the impacts of dust, noise, traffic, and visual degradation for the entire life of the project. The so-called “progressive” reclamation does not shield families from ten years of heavy equipment operations and altered landscapes. Until the very last phase is completed and the final inch of land is restored, the neighborhood will be in a constant state of disruption and detriment. The appeal fails to grapple with the reality that this is not a temporary inconvenience—it is a decade-long transformation of the area into an active extraction zone.

## 4. Claim of “Substantial Evidence” Supporting Approval Ignores Evidence to the Contrary

The Applicant claims that the Final Environmental Impact Report (EIR) supports approval of the project. However, CEQA findings of “less than significant” impacts in some areas do not override valid community planning concerns, nor do they limit the Board’s discretion to weigh broader policy, compatibility, and neighborhood character considerations. The Applicant also relies heavily on its own “Alternative Planning Commission Hearing Report”—a document written entirely to serve its own interests and to reframe the project in the most favorable light. In contrast, the report prepared by County staff is objective, rooted in the actual conditions on the ground, and informed by public testimony and expert analysis.

Importantly, the Final EIR itself acknowledges that the project would result in *significant and unavoidable* aesthetic and visual impacts—findings that alone support denial of the permit. Yet the Applicant continues to promote the myth that this project is a cure for San Diego’s housing and infrastructure needs, as if its approval would singlehandedly solve the region’s construction challenges. That narrative is speculative and unsubstantiated. The Planning Commission was entirely within its discretion to conclude that this project would be harmful to neighborhood character and incompatible with the site’s context. The Board should reach the same conclusion and deny the appeal.

## 5. No Substantial Evidence to Overturn Denial

The Applicant challenges the Planning Commission’s denial of the Major Use Permit—specifically the findings related to neighborhood character and site suitability—as lacking support. But this

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dismissal ignores the overwhelming public testimony, the consistent input from community planning groups, and the undeniable fact that the project site is surrounded by dense residential neighborhoods. These are not trivial concerns—they are exactly the kinds of factors the Board is entitled, and indeed obligated, to weigh. Zoning alone does not compel approval, particularly when broader General Plan goals—such as protection of neighborhood character, environmental stewardship, and land use compatibility—weigh heavily against the project.

One of the few constants throughout the Applicant's filings is their disregard for neighborhood compatibility. Their strategy appears to be: ignore what they cannot overcome and instead focus on technicalities. They know they cannot win the core argument that this project is compatible with the surrounding community, so they try to shift the focus to process, definitions, and economic rhetoric. But the core truth remains: this is the wrong project in the wrong place. The Commission recognized that. The Board should as well.

### **6. Claimed “Benefits” Do Not Outweigh the Project’s Harms**

The Applicant touts a series of supposed public benefits—such as open space dedication, water savings, and floodplain restoration—that are either incidental, overstated, or entirely contingent on first inflicting significant harm. These “benefits” do not meaningfully offset the loss of recreational land, the degradation of scenic viewsheds, the overwhelming public opposition, or the long-term disruption to nearby neighborhoods. More importantly, they are not true benefits—they are merely attempts to mitigate the impacts caused by the project itself, which is hardly justification for approval. For example:

1. The offer to dedicate reclaimed land as County open space only becomes relevant if the land is first degraded by mining.
2. The proposed improvements to Willow Glen Drive are made necessary only because of the heavy truck traffic the project would generate.
3. The claimed reduction in water use assumes both golf courses would continue operating indefinitely, which is speculative at best.

But perhaps the most egregious and offensive claims are the repeated assertions that the Applicant is generously donating hundreds of acres of land to the County for \$0, and that the County will benefit from increased tax revenue. These are not altruistic gestures—they read more like inducements. The idea that this donation constitutes an environmental legacy is disingenuous. The Applicant would only “preserve” the land after extracting all economic value from it and leaving the community to deal with the consequences. To call this a gift to the public is not only misleading—it is insulting.

Equally absurd is the Applicant's insistence that their “tiered” or “rolling” restoration plan is a favor to the community. What they fail to acknowledge is that the project allows for extensions to the 10-year mining timeline. And anyone familiar with similar extraction projects in the region knows that such timelines are routinely extended. History shows that operators regularly return to seek more time, more extraction, and fewer restrictions. There is no reason to believe this case will be any different. In reality, this community could be burdened not for ten years, but for decades. These so-called benefits are hollow, speculative, and conditional—and they do not come close to outweighing the long-term harm this project would cause.

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### Conclusion

The Board of Supervisors should unequivocally affirm the Planning Commission's disapproval. The Applicant's appeal is built on a foundation of technicalities, semantics, and speculative promises—while failing to reconcile the project's extensive, unavoidable, and deeply disruptive impacts. It disregards overwhelming community opposition, dismisses legitimate planning concerns, and attempts to repackage self-serving mitigation as public benefit.

This project is not just incompatible with the character, environment, and future of Rancho San Diego—it is a direct threat to it. No amount of polished appeals or cosmetic restoration plans can erase the fact that this is an industrial-scale mining operation proposed in the heart of a residential community. The Applicant's unwillingness to confront this basic reality speaks volumes.

The Valle de Oro Community Planning Group stands with the thousands of residents, stakeholders, and organizations who have raised their voices in opposition. We urge the Board not to be swayed by promises of tax revenue, open space "donations," or recycled economic narratives. Denying this appeal is not only consistent with County planning principles—it is necessary to preserve public trust in the land use process and to protect the integrity of our community.

We respectfully urge you to reject the appeal and deny the Major Use Permit and Reclamation Plan.

Respectfully,



**Oday Yousif, Chair**

Cc: Paloma.Aguirre@sdcountry.ca.gov, District 1 Supervisor  
Joel.Anderson@sdcountry.ca.gov, District 2 Supervisor  
Terra.Lawson-Remer@sdcountry.ca.gov, District 3 Supervisor  
Monica.MontgomerySteppe@sdcountry.ca.gov, District 4 Supervisor  
Jim.Desmond@sdcountry.ca.gov, District 5 Supervisor  
Christopher.Jacobs@sdcountry.ca.gov, Planning and Development Services





August 13, 2025

Via email: [PublicComment@sdcounty.ca.gov](mailto:PublicComment@sdcounty.ca.gov)

San Diego County Board of Supervisors  
c/o Clerk of the Board  
1600 Pacific Highway, Room 402  
San Diego, CA 92101

**Subject: Cottonwood Sand Mine Project (PDS2018-MUP-18-023; PDS2018-RP-001)**

Dear Chair Lawson-Remer and Members of the Board:

I am writing on behalf of the Grossmont-Mt. Helix Improvement Association (GMIA) to urge you to uphold the Planning Commission's disapproval of the Cottonwood Sand Mine Project and deny the Applicant's appeal in its entirety.

GMIA is a nonprofit volunteer 401 c (4) organization that has been serving the Mt. Helix-Casa de Oro community for almost 90 years. Our region, with more than 12,000 residences, includes the areas east of Bancroft Drive, south of El Cajon, north of SR 94 and Rancho San Diego, and west of SR54/Jamacha Road.

The proposed project lies less than a mile from our region and will significantly impact our semi-rural community. We object to the project on the following grounds:

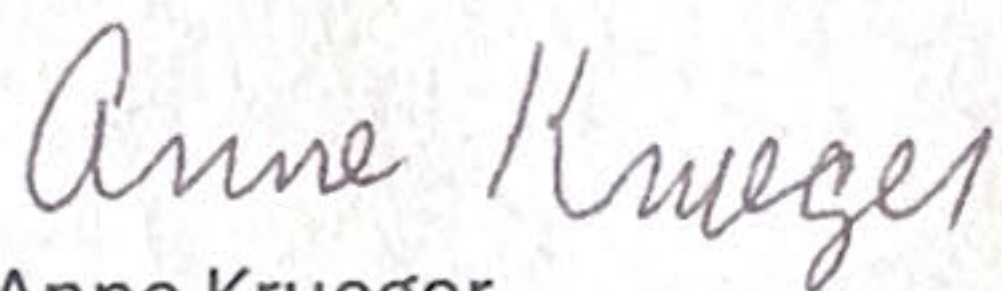
1. Non-conformance with the General Plan;
2. Non-conformance with the Community Plan;
3. Non-conformance with the Rancho San Diego Specific Plan;
4. Air quality and dust control;
5. Impact on air quality from almost 200 daily one-way truck traffic trips;
6. Traffic congestion on our surface streets and highways;
7. Traffic congestion on State Route 94;
8. Increased truck noise.



We echo the concerns expressed in the letter from the Valle de Oro Planning Group and urge you to reject this proposal that will negatively impact our beautiful community.

Thank you for considering our comments. Please contact me at [annekrueger@yahoo.com](mailto:annekrueger@yahoo.com) or (619) 252-2295 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Anne Krueger".

Anne Krueger

President, Grossmont-Mt. Helix Improvement Association.