ATTACHMENT F – Planning Commission Report and Action Sheet



The County of San Diego

Planning Commission Hearing Report

Date: July 9, 2025

Case/File

Cottonwood Sand Mine;

No.:

PDS2018-MUP-18-023, PDS2018-RP-18-001, PDS2018-ER-18-19-007

Place: County Operations Center

(COC) Hearing Room 5520 Overland Avenue San Diego, CA 92123 **Project:**

Mining and Reclamation

Time:

9:00 a.m.

Location:

3121 Willow Glen Drive, El

Cajon, CA 92019

Agenda Item: #3

General Plan:

Open Space-Recreation (OS-R)

Appeal Status: Appealable to the Board of

Supervisors

Zoning:

Open Space (S80), Specific

Plan (S88) and Holding Area

(S90)

Applicant/Owner: Cottonwood Cajon ES LLC

Community:

Valle De Oro Community Plan

Area

Environmental: Environmental Impact Report

APN:

APNs: 506-021-19; 506-020-52; 518-012-13, 14; 518-030-05, 06, 07, 08, 10, 12; 518-030-13, 15, 21, 22; 519-010-15, 17, 20, 21; 519-010-33, 34, 37; 519-011-07

A. OVERVIEW

The purpose of this report is to provide the Planning Commission with the information necessary to consider the proposed Major Use Permit (MUP) and Reclamation Plan. The Project is a request to conduct mining activities by converting most of the Cottonwood Golf Course site for sand extraction purposes. A maximum total of 570,000 tons would be produced each year for sale over a ten-year period with an additional two years for reclamation. Once mining is completed, each phase of the site must be reclaimed in accordance with the California Surface Mining and Reclamation Act of 1975 (SMARA). The project site is located at 3121 Willow Glen Drive in the Valle De Oro Community Plan Area and is zoned Open Space (S80), Specific Plan (S88) and Holding Area (S90). The Land Use Designation is Open Space-Recreation (OS-R).

The sections contained in this report describe the following: requested actions, project background, regional setting, development proposal, analysis and discussion, California Environmental Quality Act

(CEQA) information, community planning group and public input, and the Planning & Development Services (PDS) recommendation.

PDS analyzed the Project for consistency with the General Plan, Valle De Oro Community Plan, Zoning Ordinance, and other applicable regulations, policies and ordinances including CEQA. The Project includes a Final Environmental Impact Report (FEIR) with Findings of Overriding Considerations prepared by the project applicant. The view of the proposed sand mine operation would create significant adverse aesthetic impacts requiring the adoption of Overriding Considerations if the EIR were to be certified.

Additionally, when processing a MUP, Section 7358 of the County Zoning Ordinance requires that Findings be made for a project's compatibility with surrounding land uses. Findings must be made as follows:

- a. That the location, size, design, and operating characteristics of the proposed use will be compatible with adjacent uses, residents, buildings, or structures with consideration given to:
 - 1. harmony in scale, bulk and coverage
 - 2. the availability of adequate public facilities, services and utilities,
 - 3. harmful effect on the desired neighborhood character,
 - 4. the generation of traffic and the capacity and physical character of surrounding streets, and
 - 5. the suitability of the site for the type and intensity of use or development which is proposed, and to
 - 6. any other relevant impact of the proposed use.

With regard to MUP Findings a. 3 and a. 5, PDS found the Project to have a harmful effect on desirable neighborhood character and that the site would not be suitable for the proposed type of development, as detailed in the Analysis section of this report. Therefore, PDS recommends denial of the Project.

B. REQUESTED ACTIONS

This is a request for the Planning Commission to evaluate the Cottonwood Sand Mine Major Use Permit and determine if required findings can be made and, if not, take the following actions:

- 1. Deny Major Use Permit PDS2018-MUP-18-023.
- 2. Deny Reclamation Plan PDS2018-RP-18-001.
- 3. Find that this action is not subject to environmental review under Section 21080(b)(5) of the California Environmental Quality Act (CEQA) and CEQA Guidelines Section 15270 because CEQA does not apply to projects which a public agency rejects or disapproves.

The Applicant has submitted separate materials supporting that the required findings can be made. The Planning Commission may approve the Major Use Permit and the Reclamation Plan based on the Applicant's materials.

C. PROJECT BACKGROUND

Prior to the 1940s, the Project site and surrounding lands of the Jamacha Valley were predominately used for commercial ranching and agriculture, most of which had ended by the 1950s. A 1953 aerial photograph

of the Project site indicates that the floodplain of the Sweetwater River was primarily undeveloped with the presence of a small, wooden house/structure adjacent to Willow Glen Drive to the west of Steele Canyon Road. A portion of the site was also being mined for construction aggregates on the south side of the river and west of Steele Canyon Road. Mineral extraction uses in this area had expanded to the east side of Steele Canyon Road by the early 1960s.

The first permit on record for the site, Special Use Permit/MUP No. 61-090 W2M1, approved January 16, 1962, described a Commercial Sport and Recreational Enterprise, consisting of and including a golf course, driving range, restaurant, bar, putting green, pro shop, swimming pool, and other ancillary facilities. Grading plans have been approved over the years associated with golf course improvement. The most recent grading plan amendment was approved June 6, 2016. Several minor deviations were made to the original Special Use Permit between 1972 and 1989 and two modifications followed in 1992 and 1994.

A separate MUP (P83-55) for a Mining and Processing/Reclamation Plan was approved on May 30, 1984, to allow the periodic removal of sand, temporary stockpiling, preliminary screening of foreign matter, and transport of sand deposits from the Sweetwater River on the property as necessary to properly maintain free-flowing conditions. This permit was approved for a 15-year period with review periods every five years. The MUP limited the maximum number of weekly two-way truck trips to the subject property to 100.

Since 1963, the property has been used as two public golf courses. Facilities at the golf club consist of the active Ivanhoe Golf Course with a large parking lot, a clubhouse, and practice areas. Golf play on the Lakes Course was suspended indefinitely in 2017.

D. REGIONAL SETTING AND PROJECT LOCATION

The Project is proposed at the site of the privately-owned Cottonwood Golf Course at 3121 Willow Glen Drive within the floodplain of the Sweetwater River (see Figure 1, Vicinity Map). The property is within the Valle De Oro Community Planning Area of the unincorporated area of San Diego County. The subject property is surrounded by suburban development such as detached single-family homes and public facilities such as schools including the Jamacha Elementary School, located approximately one-quarter mile to the south, Steele Canyon High School approximately one-half mile to the south, Valhalla High School approximately three-quarters of a mile to the northwest, Hillsdale Middle School approximately onehalf mile to the west, and Cuyamaca College approximately two-thirds of a mile to the west. Other developments and facilities include a healthcare facility (now closed) less than a quarter mile to the south and three parks within a half mile from the project site. The site extends west to east from approximately 600 feet east of the intersection of Willow Glen Drive and Jamacha Road, to approximately a quarter mile west of the intersection of Willow Glen Drive and Hillsdale Drive. Willow Glen Drive parallels the north side of the Project site and Steele Canyon Road bisects the western portion of the site. The Project is near the McGinty Mountain Ecological Reserve and Steel Canyon Golf Course to the east and adjacent to the San Diego National Wildlife Refuge to the southwest and is located southwest of land governed by the Sycuan Band of the Kumeyaay Nation.

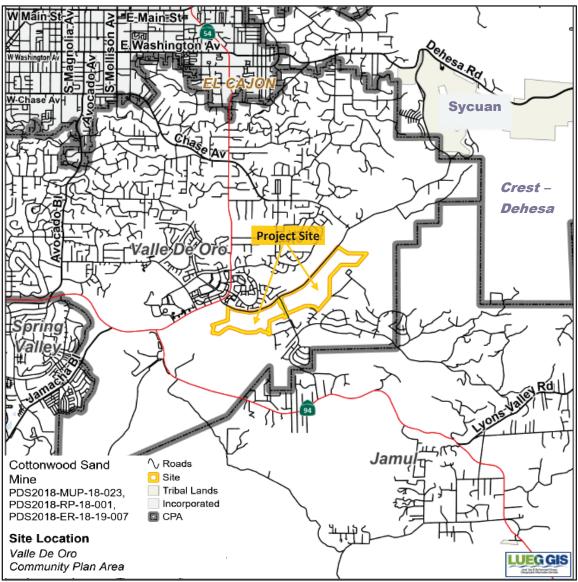


Figure 1: Vicinity map

The General Plan Regional Category is Semi-Rural, and the Land Use Designation is Open Space-Recreation (OS-R). This designation is applied to large, existing recreational areas. This designation allows for active and passive recreational uses such as parks, athletic fields and golf courses. The zoning regulations for this site are Open Space (S80), Specific Plan (S88) and Holding Area (S90). Extractive use can be permitted within the S80 and S90 zones with approval of a Major Use Permit. The S88 use regulation restricts extractive uses to site preparation, which allows the off-site removal of materials when it is secondary to the future use of the site. Although the zoning allows extractive uses in the S80 and S90 zones with a Major Use Permit, Staff could not make all the Findings required to recommend approval of an extractive use in this area.

In its current condition, the Cottonwood Golf Course consists of the Lakes Course in the western portion of the property and the Ivanhoe Course in the eastern portion of the property. In 2017, golf play at the

Lakes Course was suspended indefinitely to focus all operational efforts on the 18-hole Ivanhoe Course (See Figures 2, 3 and 4).



Figure 2: Aerial map



Figure 3: View of Golf Course, looking east from Steele Canyon Road bridge towards Project site



Figure 4: View to the Northeast, from the Upper Segment of the San Diego Wildlife Refuge Loop Trail

Please refer to **Attachment A** – Planning Documentation for maps of surrounding land uses and zoning designations.

Table 1: Surrounding Land Uses and Zoning

Location	General Plan	Zoning	Adjacent Streets	Description
North	Specific Plan Area; Village Residential (VR-4.3); Semi-Rural Residential (SR-0.5); Rural Lands (RL-20); Public Agency Lands	Open Space (S80); Specific Plan (S88); Rural Residential (RR); Single Family Residential (RS); General Commercial (C36)	Willow Glen Drive; Medinah Drive; (cross street); Muirfield Drive (cross street)	Residential neighborhoods served by SR-54 and schools (Hillsdale Middle, Vallhalla HS); Hester's Quarry
East	Semi-Rural Residential (SR-10, SR-2, SR-1); Specific Plan Area	Open Space (S80); Specific Plan (S88); Limited Agricultural Use (A70); Recreation Oriented Residential (RRO)	Cottonwood View Drive; Heatherwood Drive; Ivanhoe Ranch Road	Residential neighborhoods; Steele Canyon Golf Club; Enclave at Ivanhoe (pending GPA/TM); Jamul
South	Public Agency Lands; Semi-Rural Residential; (SR-1, SR-2, SR-10); Specific Plan Area	Specific Plan (S88); Limited Agricultural Use (A70); Recreation Oriented Residential (RRO); Rural Residential (RR); Single Family Residential (RS)	Cottonwood View Drive; Steele Canyon Road; Heatherwood Drive; Ivanhoe Ranch Road	Residential neighborhoods served by SR-94; Jamul Drive; Schools (Jamacha Elementary, Steele Canyon HS); Enclave at Ivanhoe (Pending GPA/TM); Valle De Oro
West	Public Agency Lands; Specific Plan Area; Village Residential (VR- 4.3); Semi-Rural Residential (SR-0.5)	Open Space (S80); Specific Plan (S88); General Commercial (C36); Rural Residential (RR); Single Family Residential (RS)	Willow Glen Drive	Vacant lands including Sweetwater River and San Diego National Wildlife Refuge; Cuyamaca College; Rancho San Diego Town Center

E. DEVELOPMENT PROPOSAL

The Project, submitted in 2018, is a request for Cottonwood Canyon ES LLC (Applicant) to construct and operate a sand mine. San Diego County currently has a high demand for construction aggregate, including sand. The Project includes mobile off-road equipment for excavation; raw material extraction, loading, and transport; conveyors for material transport; plant processing equipment; on-site haul trucks and associated loading equipment; and on-road haul trucks. SMARA requires that mining operations establish financial assurances prior to commencing operations.

Extraction Operations and Phasing

Approximately 214.4 acres of the approximately 280-acre site are proposed for extractive use and restoration. Sand excavation and processing plant operations would occur Monday through Friday, between the hours of 7:00 a.m. and 5:00 p.m. The maximum excavation depth is proposed to be 40 feet

below the existing land surface outside the river channel. The average depth of excavation is expected to be approximately 20 feet. The Project's mining operation would extract, process, and transport aggregate using conventional earth moving and processing equipment. The Project would extract approximately 4.3 million cubic yards of sand suitable for Portland cement concrete, with approximately 3.8 million cubic yards produced for market use over a 10-year period with an additional two-year reclamation period. The time limits prescribed for the Major Use Permit decision may be extended by the Planning Commission with the approval of a Major Use Permit Modification.

The Project would be developed in three continuous phases, with three to four subphases of less than 30 acres each, and a fourth phase for clean-up, equipment removal, and final reclamation. Topsoil removal and vegetation clearing would occur in each sub-phase prior to excavation. Project operations would involve excavation area grading (including stockpile creation), material extraction, and reclamation for each individual sub-phase. Excavation in each sub-phase would be completed before moving conveyor and excavation equipment to the next sub-phase.

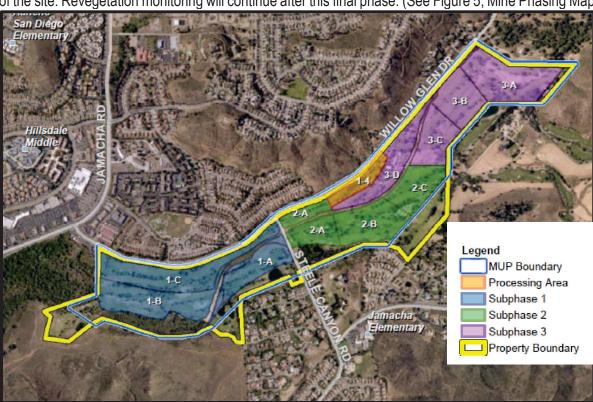
Raw materials would be excavated throughout the site using a total of two front-end loaders and a tracked excavator, which would then load material onto the conveyor belt for transport to the processing area. A dump truck may also be used if additional material transport to the start of the conveyor belt is required. Operations would commence west of the Steel Canyon Road bridge, and then generally proceed in a southwest-to-northeast direction across the Project site. There is an existing utility corridor that bisects the Project area and is located just east of Steele Canyon Road. This corridor currently provides access for overhead San Diego Gas and Electric high voltage power lines to remain. The existing Sweetwater River low-flow channel would be maintained throughout the life of the Project, preserving the on-site water resource.

Phase 1

Pre-mining activities proposed prior to the initiation of Phase 1 would include the improvement of Willow Glen Drive to four lanes from Steele Canyon Road to the Project egress driveway, improvements to the access point from Willow Glen Drive to the Phase 1 excavation area, and installation of screening landscaping. Operations would begin with the placement of the processing plant and the conveyor line from the plant to the western portion of the property where Phase 1 would commence. Aggregate extraction during Phase 1 would be located within the area currently occupied by the closed 18-hole "Lakes" golf course at the western portion of the Project. Phase 1 will begin by clearing existing vegetation, stock piling turf and topsoil for later use in site reclamation and removing the sand and aggregate underlining the 1st and 18th fairways of the Lakes course.

Phases 2 through 4

Phase 2 would be in the center of the site, east of Steele Canyon Road, on the currently operating Ivanhoe course. Public use of the Ivanhoe golf course would cease upon approval of the Project. The existing golf clubhouse would be demolished near the end of Phase 2 mining. Phase 3 mining operations would encompass the remaining acreage of the Project site located to the east of Phase 2. Phase 4 would consist of removal of the processing plant, grading to final contours, final reclamation and revegetation efforts, cleanup, and equipment removal. The final landform is proposed to be a relatively



flat plain that gently slopes downward from east to west, with a widened river channel bisecting the length of the site. Revegetation monitoring will continue after this final phase. (See Figure 5, Mine Phasing Map)

Figure 5: Mine Phasing Map

Processing Plant Site, Settling Ponds, Movable Conveyor Belt, and Stockpiles

Material processing would occur at a constant location at the processing plant for the duration of Project operations. At the processing plant, a screening machine would be used to separate granulated ore into multiple grades by particle size. The screening machine would consist of a wet blade mill fed by the incoming materials belt to break up material clumps, a drive to induce vibration, a wet screen media to induce particle separation, and a deck to hold the screen media and drive. The screen would feed into a wet screw to finish washing and remove fine materials. Aggregate material extracted from the site would consist primarily of washed sand suitable for Portland cement concrete (PCC), but may also include fill sand, gravel, and rock.

Byproducts (wash fines) produced from the processing plant would be gathered in three settling ponds located near the plant that would be 300 feet-long, 50 feet wide, and 10 feet deep. When ponds are cleaned, wash fines (silt, clay, and organic material) would either be sold as a soil amendment or returned to excavation areas that have been completed to be used as backfill or incorporated into the surface.

A conveyor belt would be used to transport mined raw material from the excavation area to the processing plant area. In Phase 1, the conveyor line would initially run parallel to Willow Glen Drive and cross beneath Steele Canyon Road near the northern edge of the bridge that crosses Sweetwater River. The conveyor line would be relocated eastward in Phase 2 and, subsequently further eastward in Phase 3 as mining operations proceed into these phases.

Aggregate material would be processed, sized and stored in stockpiles up to 25 feet in height near the plant. Several topsoil stockpiles are also proposed. These would be placed in a linear fashion in perimeter areas north - near the Willow Glen Drive corridor - or south of the excavation areas. One of the stockpiles to the southeast of the SDG&E tower pad is near existing homes sited near the south property boundary. The first six inches of topsoil at the beginning of excavation activities would be cut, hydroseeded and retained on site for reuse as each subphase is reclaimed and revegetated.

On-site Haul Truck Loading

Upon completion of processing, the construction grade aggregate would be loaded onto haul trucks for transport off site for market sale. Haul trucks are heavy duty dump trucks used in mining to carry material like crushed rock. The project proposes eighty-eight (88) trucks for export of saleable material and 58 additional truck trips for import of backfill material. There would be 146 truckloads per day, or approximately 23 truckloads per hour, between the hours of 9:00 a.m. and 3:30 p.m. Haul trucks would arrive at the site's processing plant via Willow Glen Drive, turn off onto a looped on-site driveway, be loaded with aggregate product by loader, and depart the site back onto Willow Glen Drive.

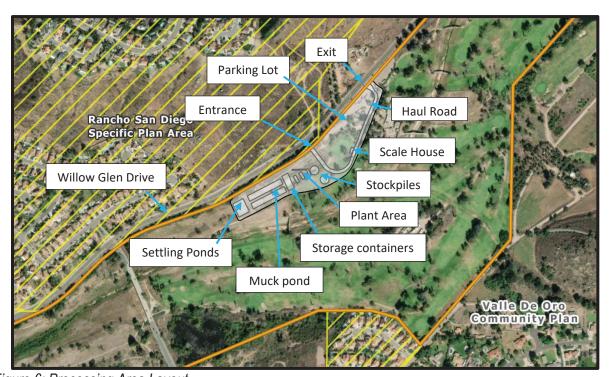


Figure 6: Processing Area Layout.

Willow Glen Drive, Muirfield Drive and Steele Canyon Road Improvements

As part of the Willow Glen Drive improvements, a new, paved access ramp off Willow Glen Drive would be provided to the west of the existing parking lot driveways. This would serve as the primary access for mining operations, material sales, employees, and vendors. This road would continue to a new egress point in the existing parking lot. A second access road would be installed on the western edge of the Project at the intersection of Muirfield Drive and Willow Glen Drive. The new driveway would be restricted to servicing the

mining operations. A new access point to the property from Willow Glen Drive west of Steele Canyon Road (Phase 1 area) would be necessary, as the clearance height of the bridge that crosses the Sweetwater River on Steele Canyon Road would not allow most large trucks or heavy equipment used for mining operations to pass beneath the bridge. This access would be used primarily for mobilization/demobilization, servicing heavy equipment and reclamation for the Phase 1 area west of Steele Canyon Road.

Existing traffic signs along Willow Glen Drive will remain, with signs added to the site entrance and exit as required. Small safety signs will be placed on fences around the Project area as required by the Mine Safety and Health Administration.

The Project would include three types of fencing:

- i) Proposed decorative lodgepole fencing will remain along the Willow Glen Drive frontage, with proposed meandering sidewalk and landscaping near the processing plant.
- ii) Existing six-foot tall chain link perimeter fencing to secure the site; and
- iii) Four-foot-tall fencing designed to allow wildlife movement is proposed adjacent to the San Diego National Wildlife Refuge (SDNWR) to the southwest.

In addition, noise barriers would be installed with each subphase, required to reduce noise impacts when mining occurs within 400 feet of a noise sensitive land use.

Reclamation Plan

Areas disturbed by resource extraction would be progressively reclaimed as operations within a given subphase are completed. Reclamation of the site would include the removal of all manmade structures, grading to achieve final slopes and landforms, incorporation of accumulated wash fines and salvaged topsoil and revegetation including installation of irrigation lines, revegetation of the channel and slopes using appropriate native species, weed control, and monitoring. Although portions of the property will not be mined, such areas may be disturbed as part of the reclamation effort for the property. Conceptual trail and pathway alignments, to be finalized in collaboration with the Parks and Recreation Department, are also part of the Reclamation Plan.

SMARA requires mining operators to provide financial assurances to guarantee the reclamation of mined lands, including bonds, letters of credit, or trust funds. The financial assurance amount is based on the cost to reclaim the site. SMARA mandates that mining operators provide financial guarantees to cover the costs of reclaiming mined lands, ensuring they are returned to a safe and usable condition after mining operations cease.

Trails

A pedestrian pathway would be provided along the northern Project frontage/Willow Glen Drive east of Steele Canyon Road to provide pedestrian access within the Project vicinity where there are no existing sidewalks. A publicly accessible community trail is also proposed to be constructed within the Project site after reclamation. The multi-use trail is intended to connect to the pedestrian pathway. Specifically, trail construction would be completed in segments and would begin in a phase area when mining activities have been completed in the phase area and reclamation has begun in the final subphase of that area.

Revegetation

At the completion of each subphase, consisting of 30 acres or less, the subphase area would be reclaimed. In phase four, expected to last approximately 8 to 10 months after the end of extraction activities in Phase 3, the processing plant and related structures used for mining purposes would be removed. The last portions of the site to be reclaimed would be graded to final contours, and revegetation would occur in accordance with a revegetation plan and wetland mitigation plan. All final reclamation activities will be completed by year twelve. Revegetation monitoring would continue after this final phase for five years or until revegetation standards are met after this final phase. The on-site open space areas would connect to the San Diego National Wildlife Refuge to the southwest.

Open Space Easement

Should the Project be approved, the Applicant is required to preserve approximately 150 acres of permanent open space through the recordation of a biological open space easement. The open space easement would apply to the land in perpetuity and restrict future uses to protect the biological value of the site. Once mining operations are completed, the revegetation and restoration would include coastal sage scrub and wetland and riparian-associated habitat. Two acres within the easement site area would consist of other uses such as riprap areas and the SDG&E transmission tower.

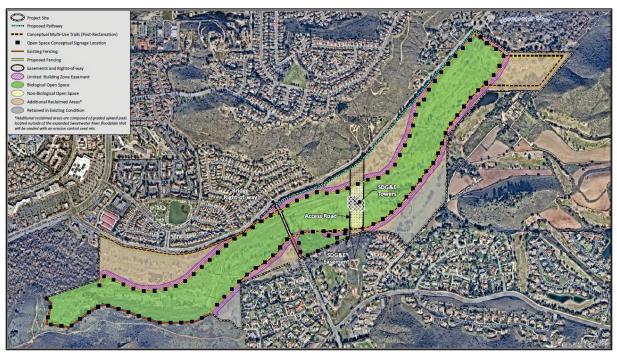


Figure 7: Open Space Exhibit

Design Exception Requests

The first DER relates to improvements along Willow Glen Drive. The Public Road Standards require a half-width minimum improvement of 39 feet. The Department of Public Works approved the DER to allow a reduction in half-width improvements to vary from 25 to 35 feet along the project frontage, east of Steel Canyon Road. The approval is based on the mining operation not being the ultimate condition of the project site, and that full-width improvements will be required once the ultimate use of the project site is determined.

The second DER is to waive undergrounding of utilities along the project frontage. Board Policy I-92, "Undergrounding of Utilities – Waiver Requests," provides three criteria for reviewing waivers to underground existing and new utilities. The waiver of undergrounding criteria are shown below in italics, along with the staff response:

- a. All other properties in the immediate area are completely "built out" to planned densities and uses and the established utility system for that area is overhead, OR
 - Staff Response: Not all the properties in the immediate area are completely built out. There are other discretionary permits in process, such as the Ivanhoe Tentative Map, that are directly adjacent to the project boundary.
- Undergrounding would result in no reduction in the number of poles on or adjacent to the project, OR
 - Staff Response: There are currently 32 utility poles that are along Willow Glen Drive. The number of poles would be reduced with undergrounding utilities.

c. The cost of undergrounding is prohibitively high based on utility company estimates.

Staff Response: The cost provided by the applicant in the undergrounding utility waiver request was \$83,044. This rather low estimate may be due to the applicant's expectation that only five poles would be removed at the project entrance in keeping with their plans. However, staff believes that the true cost of undergrounding all poles along the frontage would be substantially more.

Each request of a waiver is considered on its own merit, evaluated on site-specific circumstances. Since the majority of the site will be designated as open space once the extraction of sand has been completed, no future private development project will be processed to underground the utility poles along the project frontage.

Prior to granting a waiver of undergrounding, any request is sent to the local planning/sponsor group for review and recommendation On March 18, 2025, the Valle de Oro Community Planning Group voted to unanimously deny the waiver request for the following reasons: lack of cost analysis or viable alternatives; the proposal does not align with the Community Plan; and visual resource and public safety concerns.

Based on the findings of Board Policy I-92, the Department of Public Works and Planning and Development Services recommend the project enter into a Lien Agreement to underground the existing and new utilities prior to the completion of the use permit. The applicant is requesting the Planning Commission not approve staff's recommendation and to waive the requirement to underground utilities along the project frontage.

F. ANALYSIS AND DISCUSSION

The Project has been reviewed for conformance with all relevant ordinances and guidelines, including the San Diego County General Plan, the Valle de Oro Community Plan, Rancho San Diego Specific Plan, the County Zoning Ordinance, and CEQA Guidelines. A discussion of the Project's consistency with applicable codes, policies, and ordinances is described on the following pages. A discussion with the project's conformance with CEQA can be found in the CEQA section of the report.

1. Analysis

The public has had significant concerns with the project since the application was submitted in November of 2018. Their concerns ranged from air quality to wildfire evacuation. Concerns have been raised not just by residents in the vicinity of the Project, but by individuals of the surrounding communities of Spring Valley and Jamul. In addition, commentators include agencies, tribes, and organizations. The majority of comments address traffic, fire safety and evacuation, biological resources, noise, air quality and greenhouse gas emissions. These comments are addressed in the "California Environmental Quality Act (CEQA) Compliance" section of this report.

The analysis below addresses some of these topics as they relate to the required Major Use Permit Findings. The MUP findings discussed in the following section are distinct from CEQA and are contained in the Zoning Ordinance, while the findings that are required to certify an EIR are established in CEQA and the CEQA Guidelines. The purpose of CEQA is to assess a Project's impact on the environment.

By contrast, the purpose of the County's Zoning Ordinance, in which the Major Use Permit findings are enumerated, is intended to ensure orderly growth and protect the public health, safety and welfare of the communities of San Diego County.

Major Use Permit Findings

County Staff reviewed the Project considering the Major Use Permit Findings required to be made pursuant to the County's Zoning Ordinance. Staff has determined that some of these findings cannot be made for the Project. Specifically, staff has concluded that Finding 3, regarding the harmful effect on the neighborhood character, and Finding 5, regarding the suitability of the site for this type of development, cannot be made. The findings that cannot be made are discussed below.

Finding 3: The harmful effect, if any, upon desirable neighborhood character. The proposed mining Project will have a harmful effect upon desirable neighborhood character because it will add haul trucks on the roads, increase potential sources of noise, change the way the site looks for residents and visitors, and create a nuisance from dust. The Sweetwater River Valley is home to residents, locally serving commercial uses, and recreational areas including trails used daily by hikers and equestrians. The nature of sand mining, involving heavy machinery and truck hauling, is incompatible with nearby uses. Truck traffic would undermine the rural character and introduce noise and a more industrial effect on the nearby roads.

The Project is a major extraction operation that includes a central processing plant and large haulage trucks to transport materials. The trucks are proposed to operate five days each week for a minimum of ten years. The Project proposes eighty-eight (88) trucks for export of saleable material and 58 additional truck trips for import of backfill material. There would be 146 truckloads per day, or approximately 23 truckloads per hour, between the hours of 9:00 a.m. and 3:30 p.m.

The existing noise on the site consists of noise associated with a golf course. Although the Project was found to be less than significant with respect to noise per the CEQA thresholds by implementing noise attenuation measures, the types of sound coming from the Project will be different from the current sounds in the neighborhood. While residents of the homes south of the site currently hear noises such as leaf blowers, helicopters, traffic, Golf Couse carts, chatter, and ambient noise from nature, if the mining project were to be approved, they would be hearing noise from a processing plant, material extraction and grading, and haul trucks. Haul trucks would create on-going noise from the Project operations with designated haul routes from 9:00 a.m. to 3:30 p.m. every weekday. Also, because equipment that has an obstructed view to the rear must be provided with a back-up alarm, the alarms will be a source of intermittent noise. The Project would generate noise during operations from mobile off-road equipment for excavation area grading; raw material extraction, loading, and transport; material transport; processing plant equipment; and associated loading equipment. This would change the neighborhood character which currently does not contain these noise sources. In addition, the noise would be present for the residents of this neighborhood during the life of the Project—five days a week for a minimum of ten years.

The Project further results in a harmful effect upon desirable neighborhood character because it will change the way the site looks to residents and visitors who are driving by or who live near the site. Currently, the neighborhood is suburban in nature and primarily comprised of residential neighborhoods and the golf course with natural features of the river corridor and surrounding hillsides and mountainous

landforms. The Project would convert this existing state into an extractive use in an otherwise suburban setting. The Project will be required to install 8-foot and 12-foot noise barriers, which would be relocated with each phase. Also, six-foot high chain link fencing with screening mesh will be installed along Willow Glen Drive, a County scenic highway, and 3-foot-high fencing with screening mesh will be installed on the northbound Steele Canyon Road Bridge railing to help screen the processing plant and exposed soils and mining activities in Phases 1 and 2 from motorists and cyclists. These screens may be installed and removed sequentially during the adjacent actively mined subphase areas and will limit the existing views from the scenic highway (see Figures 8 and 9). Also, if a resident were to stand on Wind River Road today looking out to the valley, they would see a valley with a golf course and trees. During the mining operation, they would see acres of disturbed land(see Figures 10 and 11).

The Project will introduce new sources of dust to the site and immediate vicinity. The Project will create dust during the daily operations. While mitigation measures will be implemented to reduce air quality impacts to less than significant under CEQA, there will still be a new source of dust from Project operations and odor from diesel emissions that currently does not exist with the current golf course use. Whereas the current golf course use generates few emissions, the Project will add heavy trucks and equipment.



Figure 8: Existing View from Willow Glen Drive, Looking Toward the Project Site



Figure 9: View from Willow Glen Drive, During Operations



Figure 10: Existing View to the Southeast, from the Wind River Road Lookout



Figure 11: View to the Southeast, from the Wind River Road Lookout (Project Operations, Subphase 3B)

<u>Finding 5: The suitability of the site for the type and intensity of use or development which is proposed.</u> The site is not suitable for the proposed mining operation due to its location within a suburban setting. The site is situated in a river valley near a variety of existing residences, schools, a health care facility (now closed), and open space. Therefore, although the site contains a useful resource (sand), the nature of sand mining involves heavy machinery and truck hauling which is incompatible with these nearby uses.

Residential development in the area includes over 150 homes. The valley is home to several subdivisions consisting of single-family dwellings. These include homes on the north side of Willow Glen Drive and homes located to the south of the golf course. To the north are homes such as those along and around Emerald Point Court and Sawgrass Street near Hilton Head County Park. To the south are homes located off Ivanhoe Ranch Road and Steele Canyon Road, some of which abut the golf course. Many of these homes were built around a golf course, and residents assumed that they would be living near a quiet golf course. However, proposed mining operation will introduce trucks, noise, dust pollution and heavy machinery into an established neighborhood.

2. Zoning Ordinance Consistency

The Project site is zoned Holding Area (S90), Specific Plan (S88) and Open Space (S80). These zones are further described in the following table:

Table 2: Site Zoning Regulation

S80 zone	The S80 (Open Space) zone is used to provide appropriate controls for areas considered
	unsuitable for intensive development, including hazard or resource areas, public lands,
(4.01 acres)	recreation sites, or lands subject to open space easements or similar restrictions.

S88 Zone	The S88 (Specific Planning Area) zone applies to 32 acres in the southwestern portion of the Project site that are not used for golf course operations. <i>This area will not be mined.</i>
(32 acres)	However, it will be used for site preparation which is allowed per the zone.
S90 Zone	The S90 (Holding Area) designation is intended to prevent isolated or premature land
	uses from occurring on lands for which adequate public services and facilities are
(243.78	unavailable, or for which the determination of the appropriate zoning regulations is
acres)	precluded by contemplated or adopted planning proposals or by a lack of economic,
	demographic, geographic, or other data. Extractive use can be permitted within the S80
	and S90 classifications with approval of a Major Use Permit.

The County Zoning Ordinance also identifies a Special Area Designator that applies to the Project site, Special Area Designator F (Flood Plain). Special Area Designators are applied to areas with special interest or unusual value; the Special Area Designator F (Flood Plain) is intended to protect the public health, safety, and welfare from flooding.

3. California Environmental Quality Act (CEQA)

The Project has been reviewed for compliance with the CEQA, and an Environmental Impact Report (EIR) has been prepared for the processing of the Project.

The Notice of Preparation (NOP) of the Draft EIR was circulated for public review from October 24, 2019, to November 22, 2019. During this time, input on the scope and content of the environmental information to be contained in the Draft EIR was received from the public and agencies. A Public Scoping Meeting was held at Hillsdale Middle School on November 4, 2019. Public comments made during the notice of EIR preparation (NOP) and NOP scoping meeting provided information on topics that the EIR should address.

The Draft EIR for the Cottonwood Sand Mining Project was circulated for public review from December 16, 2021, to February 28, 2022. An online/phone-in public meeting/teleconference was held on Wednesday, January 19, 2022, from 7:00 p.m. until 9:30 p.m. During the EIR notice of availability process (NOA), formal written comments were submitted specific to the draft EIR and spurred revisions included in the recirculation of the draft EIR. Specifically, new information regarding the need for additional soil import to achieve final reclamation elevations and the number of truck haul trips generated by the Project to accommodate this import was added to the Project description. New information regarding the potential for significant impacts to biological resources, the findings of additional biological surveys, and additional mitigation measures were added to the biological resources analysis. An in-person public meeting was held on the Recirculated Draft EIR on July 25, 2023, from 6:30 p.m. to 8:30 p.m. at Hillsdale Middle School in El Cajon. The Recirculated Draft EIR for the Cottonwood Sand Mining Project was available for public review from June 29, 2023, to August 21, 2023.

Comments were received from individuals, organizations, and agencies and tribal interests during the public review period of the Draft REIR. Most comments addressed traffic and trails, air and water quality, health effects related to Valley Fever, fire safety and evacuation, cultural and tribal cultural resources, noise, biological resource concerns, visual character and land use compatibility. These comments are addressed in response to comments included within the Final EIR.

On May, 20, 2025, the Final EIR (FEIR) was made available on the Planning & Development Services website for public access

Environmental Effects and Significant Impacts

The Draft EIR and Recirculated Draft EIR identify significant environmental impacts to the following environmental factors: Aesthetics; Biological Resources; Cultural Resources; Noise, Paleontological Resources, and Tribal Cultural Resources. Impacts to Aesthetics, even with mitigation measures, would remain significant and unavoidable. All other potential significant impacts would be reduced to less than significant with implementation of mitigation measures. The following discussion includes some of the CEQA subject areas that generated the most interest and concern from the community.

Aesthetics

The CEQA analysis contained in Chapter 2.1 of the FEIR discusses existing viewsheds and key vantage points, County thresholds of significance, and impacts. The Project site is visible from nearby open space areas, public roadways and residential subdivisions. Motorists have views onto the Project site traveling along Willow Glen Drive and along the bridge span over Sweetwater River on Steele Canyon Road. Project site areas are visible from certain homes in the area, including residential development located north of Willow Glen Drive, further east and at higher elevations above the valley, and south of the Project site.

Several Project design features, such as installation of new landscaping (i.e., the landscape screening and entrances plan), fencing, mesh screening, box trees along the western and southern boundary of the processing plant, painting of mining equipment to blend with the color of the exposed soil, and limiting the height of stockpiles to 25 feet (see Chapter 7.0 for all design considerations), would help to reduce the visual impacts and enhance screening of Project components during active mining of the site. However, due to the anticipated strong contrasts associated with Project effects to terrain and vegetation; visibility of effects from roads, trails, and residences; and the duration of mining and reclamation activities (i.e., up to 12 years), impacts would be significant and unmitigable.

While impacts to sensitive vegetation communities would be limited, the riparian corridor of the Sweetwater River including the golf course is a major scenic resource of the community and is considered visually notable at the local level. Therefore, implementation of the Project would result in the loss of these features during mining, which would be considered a significant and unmitigable impact relative to the loss of on-site sensitive vegetation and trees within the Sweetwater River corridor.

The Valle de Oro Community Plan identifies Willow Glen Drive as a scenic highway corridor. The visual quality of the scenic landscape visible from Willow Glen Drive would be degraded as mining activities would impact existing intactness, unity, and memorability. Thus, scenic vista impacts from Willow Glen Drive would be significant and unmitigable. The anticipated impacts to existing views from elevated portions of the Wildlife Refuge Loop Trail would be significant and unmitigable. and potential impacts to views across the Project site from the Sweetwater Regional Trail would be significant and unmitigable.

Noise

The EIR discusses noise, County thresholds of significance, and impacts. The current dominant noise source in the vicinity of the Project site is the traffic along Willow Glen Drive and Steele Canyon Road. To determine the existing daytime noise environment, short-term ambient daytime noise measurements were conducted on Thursday, January 3, 2019, at locations adjacent to or near the Project site. Additional long-term (24-hour) ambient noise measurements were conducted at locations adjacent to the Project site to determine the existing noise levels at Noise Sensitive Land Use (NSLU) locations near the Project site. NSLUs include any residence, hospital, school, hotel, resort, library, or other facilities where lower noise levels are an important attribute of the environment. Potential NSLUs immediately surrounding the Project site that would be subject to noise from the Project's mining operations include single-family residences, Hilton Head County Park and the now closed Adeona Healthcare facility.

Due to the large number of residential properties adjacent to the Project site, surrounding residences were categorized into eleven "Residential Groups" based on general location and anticipated proximity to the Project's various mining operations. Based upon the noise analysis, it was determined that noise levels could exceed the 60 dB CNEL maximum allowable noise level for eight of the eleven Residential Groups surrounding the Project site.

To decrease noise impacts associated with the Proposed Project, mitigation is required. The mitigation is to construct noise barriers and excavate to the lowest feasible elevation within the Project's excavation areas such that the topography provides noise attenuation to off-site properties. For certain residential locations an 8-foot-high or 12-foot-high solid noise barrier is required when excavation is occurring within 400 feet. When mining activities are occurring at distances greater than 400 feet from a given location, a barrier would not be required. The EIR concluded that implementation of these mitigation measures will ensure the Project has a less than significant impact for noise.

Traffic

For compliance with CEQA, a Transportation Impact Analysis was conducted for the project and concluded that there is a less than significant transportation impact. The project is subject to Senate Bill (SB) 743 which led to Vehicle Miles Traveled (VMT) being the metric required for determining transportation impacts for CEQA. The Governor's Office of Planning and Research (OPR) in their Technical Advisory for VMT implementation stated that local agencies may develop project specific thresholds for unique land-use projects.

The Project-Specific VMT threshold proposed for the project is a 15% net reduction in Annual VMT. This is appropriate as CEQA requires that lead agencies must estimate the net change in total VMT with and without the project. This is accomplished by looking at the miles traveled to and from the project site in the context of how the project is likely to divert existing trips, and what the impact of those diversions will be on total VMT.

The analysis demonstrated that the project would result in a 35.8% reduction in VMT as it would provide a local supply of sand, reducing the need for imported sand from more distant sources resulting in a less than significant impact for transportation.

A Local Mobility Analysis was conducted for the project that analyzed roadway operations near the project site. As stated in the FEIR, the Project would meet the County's standards set forth for roadway design and avoidance of traffic hazards. This is because the Project includes improvements to Willow Glen Drive, including:

- Restriping Willow Glen Drive between Steele Canyon Road and the Project ingress driveway to provide Class II buffered bike lanes on both sides of the roadway per County Roadway Standards.
- To facilitate deceleration of right-turning vehicles into the Project ingress driveway, a dedicated right-turn lane would be constructed, which would serve as the primary access for mining operations, material sales, employees, and vendors. A new egress point would be established in the approximate center of the existing parking lot. Construction of a two-way left-turn lane between the ingress and egress driveways, which would serve as a refuge lane for trucks to complete their outbound maneuver.

Two sets of traffic counts were taken for the Project, one pre-dating the pandemic and one post-dating the pandemic. The counts were taken during peak hours (i.e. 7:00 to 9:00 AM and 4:00 to 6:00 PM) which is the "worst case" traffic condition when the most vehicles would be on the road. The proposed mining project would generate 766 average daily trips (ADT). To calculate average daily traffic, a passenger car equivalence factor is applied to these trucks, for a total of 730 ADT from truck traffic. In addition to the heavy vehicle trips, 14 employee and visitor light vehicles and four vendors (e.g., fuel, supplies, service companies, etc.) were assumed to access the Project site on a typical day making two trips per vehicle, for an overall total of 766 ADT. i

Air Quality and GHG

As part of the EIR, an Air Quality Technical Report, and subsequent addendum, were completed for the project. As described in EIR, the Project would incorporate Best Management Practices (BMPs) to reduce fugitive dust consistent with SDAPCD Rule 55 — Fugitive Dust Control during construction and mine operation and reclamation. This includes actions to stabilize storage piles, enforcement of 15-mph speeds on unpaved surfaces, twice daily watering of exposed areas and termination of activities if winds exceed 25 mph. On- and off-road equipment would be required to comply with Best Available Control Technology (BACT) for reduction of exhaust particulate matter, involving replacement of older equipment with equipment meeting the U.S. Environmental Protection Agency (USEPA) Tier-4 specifications or retrofitting equipment with diesel particulate filters, in accordance with California Air Resources Board (CARB) regulations and implementation schedules. All of these actions would reduce air quality impacts to a less than significant impact.

Construction of the Project would generate GHG emissions from the use of off-road equipment and from vehicles traveling to and from the site on public roads (sand delivery trucks, work vehicles, and vendor vehicles). The majority of the Project's operational GHG emissions would be associated with truck trips for hauling sand and backfill material. Aggregate material (including sand) produced by San Diego County mines and quarries are typically used by construction projects. Because of the high weight and bulk of aggregate materials, a significant portion the cost of aggregate material is associated with delivery to the end use site. Therefore, construction project managers will typically purchase necessary aggregate products from the closest available source with acceptable quality. It is reasonable to assume that production of PCC-grade sand on the Project site would result in a reduction in regional mobile-source

GHG emissions. The results of the VMT analysis contained within the Traffic Impact Analysis also confirmed this. By reducing regional truck VMT, the Project would result in an overall net reduction in mobile source GHG emissions. The Project would result in a peak annual net increase of 3,707 MT CO2e per year, which is below the screening level for industrial sources of 10,000 MT CO2e per year. Therefore, the Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and the impact would be less than significant.

Fire Severity

The project site is served by the San Miguel Consolidated Fire Protection District. The closest fire station to the project site, Station 22, is located approximately 0.3 mile to the north near the intersection of Brabham Street and Via Rancho San Diego. According to the Fire Protection Plan (FPP) prepared for the Project, the Project site is within an area designated as a Moderate Fire Hazard Severity Zone and is bordered to the south by an area designated as a Very High Fire Hazard Severity Zone. Based on the past and current use of the Project site as golf courses, the site does not contain a substantial amount of vegetation that could serve as fire fuel. In addition, as the Project's mining operations progress over the 10-year mining period, flammable vegetation would be removed and the potential for onsite fire would diminish.

The Project would also adhere to the recommendations outlined in the Fire Protection Plan, which include skirting temporary portable buildings to prevent the accumulation of windblown leaf litter and other combustible debris; maintaining a 100-foot fuel management zone around structures; ensuring that plants within the fuel modification zone are fire resistant; appropriately maintaining existing trees until they are removed as part of the site reclamation activities; ceasing extraction and conveyor operations when wind speed instantaneously exceeds 25 mph or when the wind speed average for 15 minutes is greater than 15 mph; and maintaining and equipping construction equipment with spark arrestors.

Through complying with the applicable recommendations, the Project would minimize hazards related to fires and would not generate increased demand for fire protection or place a significant strain on the existing fire protection facilities. Further, through complying with applicable regulations related to workplace safety, such as those governed by the Mine Safety and Health Administration (MSHA) and Occupational Safety and Health Administration (OSHA), the anticipated number of events requiring emergency response is anticipated to be very low. The construction of new fire facilities and expansion of existing facilities would not be required to serve the Project. Therefore, the Project would not affect fire protection response times or substantially increase demand and impacts would be less than significant.

G. COMMUNITY PLANNING GROUP

On March 18, 2025, the Valle de Oro Community Planning Group (CPG) reviewed the Project. The CPG recommended denial of the Major Use Permit and Reclamation Plan by a vote of 11-0-0-4 (11-Yes, 0-No, 0-Abstain, 4-Vacant/Absent).

In the same meeting, the Valle de Oro Community Planning Group voted to recommend denial of the applicant's request for a Design Exception Review involving the waiver of the requirement to underground an AT&T overhead line along Willow Glen Drive by a vote of 10-0-1-4 (10-Yes, 0-No, 1-Abstain, 4-Vacant/Absent).

The Valle de Oro Community Planning Group Recommendation Forms and correspondence can be found in **Attachment C** – Public Documentation.

In addition to Valle de Oro, the Spring Valley and Jamul Community Planning Groups expressed opposition to the Project in written comments provided during the public comment periods of the draft EIR and draft Recirculated EIR.

H. PUBLIC INPUT

There is extensive public input on this Project. The public input includes written correspondence in the form of letters and e-mail from agencies, organizations, tribal interests and individuals, as well as signed citizen petitions. Community meetings were held in Valle De Oro that also involved extensive public commentary. Most comments addressed CEQA topics including: Air quality and fugitive dust, biological resource concerns and impacts on wildlife, cultural / tribal cultural resource impacts, Emergency response, fire safety and evacuation, health effects related to Valley Fever, noise, traffic including road damage, visual character and land use compatibility and water quality impacts including contamination of groundwater and drinking water in the Sweetwater reservoir.

The FEIR contains Appendices A through Z prepared not only to address the requirements of CEQA but also to address topics of concern by the community. In addition to responses to agencies, organizations, tribal interests and individuals, the FEIR includes responses to comments covering 12 topics listed as follows:

Table 3: Topical Response to Comments

Table J.	ropical Nesponse to Comments
1	Reason for the Recirculation of the DEIR and the Recirculated DEIR Process
2	CEQA Requirements for Responding to Comments
3	EIR Errata and Updated Technical Reports
4	Reclamation Process, Timing, and Final Use
5	Imported Material and Backfilling Process
6	Public Health Effects
7	Noise Impacts
8	Traffic Impacts
9	Wildlife Corridors and Species Connectivity Impacts
10	Cumulative Impacts
11	Consistence with Plans and Policies
12	Flood Control and Bridge Design

Each public comment was responded to in the FEIR which is available on the County website at this link: https://www.sandiegocounty.gov/pds/ceqa/MUP-18-023.html

I. RECOMMENDATIONS

Staff recommends that the Planning Commission take the following actions:

- a. Find that this action is not subject to environmental review under Section 21080(b)(5) of the California Environmental Quality Act (CEQA) and CEQA Guidelines Section 15270 because CEQA does not apply to projects which a public agency rejects or disapproves.
- b. Deny Major Use Permit PDS2018-MUP-18-023 due to the inability to make Major Use Permit Findings 3 and 5, as discussed above.
- c. Deny Reclamation Plan PDS2018-RP-18-001.

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ATTACHMENTS:

Attachment A – Planning Documentation

Attachment B – Environmental Documentation (EIR under separate cover)

Attachment C – Public Documentation (other than comments in FEIR)

Attachment D- Environmental Findings

Attachment E - Ownership Disclosure

Hearing Date: July 9th, 2025

PLANNING COMMISSION ACTIONS

Compiled by: Georgina Gaines. Commission Secretary Telephone: (619) 517-4193

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Agenda Item	Agenda Item Agenda Item		esoddO	Neutral	Арр	Deny	Cont' d	Planning Commission Motion(s)	Y N A R A B	YNARAB	YNARAB	YNARAB	Y N A R A B	Y N A R A B		
Α	Statement of Proceedings							The Statement of Proceedings is read by the Commission Secretary before the start of hearing.		-1		-1				Α
В	Roll Call	1				1		6 Commissioners were present. None are absent.	Υ	Υ	Υ	Υ	Υ	Y		В
С	Statement Just Cause							None at this time								С
D	Public Communication	-				1-		Commission Secretary that 4 callers were on hold to speak.		1		1				D
E	Handouts							N/A								E
F	Continuances							None at this time.		1		1				F
G	Consent Calendar							Commission Secretary noted that item 1, was available for approval on today consent calendar.	Y	Υ	Υ	Υ	Υ	Y		G
1	Alpine Carwash Major Use Permit					1		This item was approved for consent. Commissioner Pallinger motioned to approve item 1. Commissioner Edwards seconded the motion. Motion Passed: 6-0-0-0-0	Y	Y	Y	Y	Y	Y	AP	

Planning Commission Actions December 06 2024

Dec	cember 06, 2024	1	 1					1					
2	Namoo Residence Variance Permit		 	 	Commissioner Edwards motioned to approve item 2. Commissioner Weber seconded the motion. Motion passed:6-0-0-0	Y	Y	Y	Y	Y	Y	ES	
3	Cottonwood San Mine Project		 	 	Commissioner Weber motioned to approve staff recommendation. Commissioner Calvo seconded the motion. Motion failed:3-3-0-0-0 Commissioner Edwards motioned refusal of staff recommendation and endorse the Applicant Alternative Planning Commission Hearing Report Commissioner Sudberry seconded the motion. Motion failed:3-3-0-0-0	Y	Y	Y	Y	Y	Y	CJ	
Н	Administrative Agenda Items				N/A							GG	Н
1	Department Report		 -	 1	 No Department Report provided				1			VN	I
J	Scheduled Meetings		 	 	 August 22 , 2025								J
K	Adjournment		 	 					-		1		Κ

RA= Ronald Ashman; YC = Yolanda Calvo; ME = Michael Edwards; DP = David Pallinger; MW= Molly Weber; CS= Colton Sudberry

⁻⁻ Y = Yes Vote; N = No Vote; A = Absent; R = Recused; AB = Abstain