

ATTACHMENT D –
Public Documentation

Valle de Oro Community Planning Group

3755 Avocado Blvd #187, La Mesa, CA 91941

Oday Yousif, *Chair*

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.

Valle de Oro Community Planning Group

3755 Avocado Blvd #187, La Mesa, CA 91941

Oday Yousif, *Chair*

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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Oday Yousif, *Chair***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

Valle de Oro Community Planning Group

3755 Avocado Blvd #187, La Mesa, CA 91941

Oday Yousif, *Chair*

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.

Valle de Oro Community Planning Group

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Oday Yousif, *Chair***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@sdcounty.ca.gov, District 1 Supervisor
Joel.Anderson@sdcounty.ca.gov, District 2 Supervisor
Terra.Lawson-Remer@sdcounty.ca.gov, District 3 Supervisor
Monica.MontgomerySteppe@sdcounty.ca.gov, District 4 Supervisor
Jim.Desmond@sdcounty.ca.gov, District 5 Supervisor
Christopher.Jacobs@sdcounty.ca.gov, Planning and Development Services



County of San Diego, Planning & Development Services
COMMUNITY PLANNING OR SPONSOR
GROUP PROJECT REVIEW
ZONING DIVISION

ATTACHMENT D

Record ID(s): PDS2018-MUP-18-023 ;PDS2018-RP-18-001

Project Name: Cottonwood Sand Mine

Project Manager: Christopher Jacobs

Project Manager's Phone: christopher.jacobs@sdcounty.ca.gov

Scope of Review:

Board Policy I-1 states; "groups may advise the appropriate boards and commissions on discretionary projects as well as on planning and land use matters important to the community." Planning & Development Services (PDS) has received an application for the project referenced above. PDS requests that your Group evaluate and provide comment on the project in the following areas:

- The completeness and adequacy of the Project Description
- Compatibility of the project design with the character of the local community
- Consistency of the proposal with the Community Plan and applicable zoning regulations
- Specific concerns regarding the environmental effects of the project (e.g., traffic congestion, loss of biological resources, noise, water quality, depletion of groundwater resources)

Initial Review and Comment:

Shortly after an application submittal, a copy of the application materials will be forwarded to the Chair of the applicable Planning or Sponsor Group. The project should be scheduled for initial review and comment at the next Group meeting. The Group should provide comments on planning issues or informational needs to the PDS Project Manager.

Planning Group review and advisory vote:

- A. **Projects that do not require public review of a CEQA document:** The Group will be notified of the proposed hearing date by the PDS Project Manager. The project should be scheduled for review and advisory vote at the *next Group meeting*.
- B. **Projects that require public review of a CEQA document:** The Chair of the Planning Group will be noticed when an environmental document has been released for public review. The final review of the project by the Group, and any advisory vote taken, should occur *during the public review period*.

As part of its advisory role, the Group should provide comments on both the adequacy of any environmental document that is circulated and the planning issues associated with the proposed project. The comments provided by the Group will be forwarded to the decision-making body and considered by PDS in formulating its recommendation.

Notification of scheduled hearings:

In addition to the public notice and agenda requirements of the Brown Act, the Group Chair should notify the project applicant's point of contact and the PDS Project Manager at least two weeks in advance of the date and time of the scheduled meeting.

5510 OVERLAND AVE, SUITE 110, SAN DIEGO, CA 92123

Building: (858) 565-5920 | Zoning: (858) 694-8985 or PDSZoningPermitCounter@sdcounty.ca.gov

<http://www.sdcounty.ca.gov/pds>



County of San Diego, Planning & Development Services
**COMMUNITY PLANNING OR SPONSOR
GROUP PROJECT RECOMMENDATION**
ZONING DIVISION

ATTACHMENT D

Record ID(s): PDS2018-MUP-18-023 ;PDS2018-RP-18-001

Project Name: Cottonwood Sand Mine

Planning/Sponsor Group: Valle de Oro Community Planning Group

Results of Planning/Sponsor Group Review

Meeting Date: March 18, 2025

A. Comments made by the group on the proposed project.

Please find comments attached.

B. Advisory Vote: The Group ☒ **Did** ☐ **Did Not** make a formal recommendation, approval or denial on the project at this time.

If a formal recommendation was made, please check the appropriate box below:

- MOTION:**
- ☐ Approve without conditions
 - ☐ Approve with recommended conditions
 - ☒ Deny
 - ☐ Continue

VOTE: 11 Yes 0 No 0 Abstain 4 Vacant / Absent

C. Recommended conditions of approval:

Reported by: Oday Yousif Position: Chair Date: 3/18/25

Please email recommendations to **BOTH EMAILS**;

Project Manager listed in email (in this format): Firstname.Lastname@sdcounty.ca.gov and to CommunityGroups.LUEG@sdcounty.ca.gov

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Oday Yousif, *Chair*

March 18, 2025

Via U.S. Postal Mail & Email: christopher.jacobs@sdcounty.ca.gov

San Diego County
 Planning & Development Services
 Attn: Christopher Jacobs
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

Subject: Recommendation of the Valle de Oro Community Planning Group for Cottonwood Sand Mine Major Use Permit (PDS2018-MUP-18-023) and Reclamation Plan (PDS2018-RP-18-001)

Dear Mr. Jacobs:

At the March 18, 2025, meeting of the Valle de Oro Community Planning Group (VDO CPG), the group formally moved to recommend denial of the Cottonwood Sand Mine Major Use Permit (PDS2018-MUP-18-023) and Reclamation Plan (PDS2018-RP-18-001). This detailed evaluation, based on the Scope of Review outlined in San Diego County Board Policy I-1, references materials from the County's official project webpage, previous community group communications, zoning regulations, the Valle de Oro Community Plan, and the detailed Valle de Oro Community Planning Group Comment Letter dated August 1, 2023.

1. Completeness and Adequacy of the Project Description

The project description as currently provided on the County's official project webpage lacks essential details and comprehensive clarity regarding key elements of the project. The increase in truck trips to a daily total of 146 round trips significantly alters the impact profile of this project. However, detailed analyses of this increase's impact on local infrastructure, traffic safety, and environmental quality remain insufficiently articulated. Additionally, the use of potentially hazardous backfill materials—such as concrete and asphalt—is mentioned without adequate discussion regarding their long-term environmental implications, potential contamination risks, and how these materials will affect local water quality, particularly within the sensitive Sweetwater River watershed. An additional concern is the lack of clear liability during and after the reclamation period. With the real possibility that reclamation is not successful, the future of the site is compromised.

Further, the project description inadequately explains stormwater runoff management. Given the project's duration (at least 10 years), more robust planning and clear specifications are required for addressing potential pollution risks, soil erosion control, and overall impacts to the Sweetwater River watershed and the Sweetwater Reservoir downstream, which serves as a drinking water source for approximately 200,000 residents. The Stormwater Quality Management Plan must detail more specific protections to address runoff pollutants throughout the life of the project, rather than relying on generalized or future promises of mitigation.

Valle de Oro Community Planning Group

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Oday Yousif, *Chair***2. Compatibility of Project Design with the Local Community**

The Cottonwood Sand Mine project's proposed industrial activities starkly contrast with the semi-rural and suburban character of the Rancho San Diego area, severely impacting residents' quality of life. The Valle de Oro community prides itself on its harmonious blend of residential neighborhoods, natural open spaces, recreational amenities, and educational facilities. However, the project's proposed industrial operations—with minimal setbacks as close as 100 feet to residences—significantly threaten this community's harmony and character.

The area's visual and environmental aesthetic, marked by natural landforms, residential neighborhoods, and local wildlife habitats, would suffer irreversible disruption from the mine's industrial presence. Moreover, the proposed visual and structural intrusions—including the presence of industrial-scale equipment, noise barriers, conveyor systems, and heavy truck traffic—will create severe visual impacts, disrupting both the character and tranquility of the community.

The VDO CPG is particularly concerned about the project's potential to create cumulative impacts on noise pollution, airborne particulates, and aesthetic degradation, drastically altering the quality of life for local residents, students attending nearby schools, and seniors residing in local assisted living facilities.

3. Consistency with Community Plan and Zoning Regulations

The proposed Cottonwood Sand Mine Project is unequivocally inconsistent with both the Valle de Oro Community Plan and the San Diego County General Plan, particularly regarding land use and zoning designations. The site's zoning, designated explicitly as Open Space-Recreation, is meant to facilitate passive recreational uses, protect sensitive ecological areas, and conserve valuable open space resources. The introduction of industrial sand mining is fundamentally contrary to these zoning intentions, constituting inappropriate land use for this location.

Furthermore, the proposed project's proximity to critical Biological Resource Core Areas (BRCAs) significantly undermines key objectives of the San Diego County Multiple Species Conservation Program (MSCP). These BRCAs are designed to preserve vital wildlife corridors and habitats for numerous sensitive and endangered species. Introducing industrial activities that fragment these habitats jeopardizes years of dedicated conservation efforts aimed at preserving the region's ecological integrity and biodiversity.

The project also directly violates specific guidelines stated in the Valle de Oro Community Plan that prioritize conserving sensitive habitats, protecting open space resources, and preventing environmental degradation from industrial uses, particularly along designated scenic corridors such as Willow Glen Drive. This scenic route's character, central to community identity, would be irrevocably altered, negatively affecting both ecological integrity and community aesthetics.

4. Specific Concerns Regarding Environmental Effects

- **Traffic and Roadway Safety:** The project's proposed traffic volume of 146 daily round-trip truck movements along Willow Glen Drive would exacerbate existing congestion, create significant public safety hazards, and increase noise and air pollution. The community already faces heavy traffic from existing mining operations and commercial activities, and adding extensive truck traffic would significantly heighten the risk of accidents and negatively impact local infrastructure.

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- **Biological and Ecological Impacts:** The Cottonwood Sand Mine would directly harm sensitive habitats and disrupt critical wildlife corridors essential for numerous protected and endangered species. Proposed mitigation measures, primarily deferred until after the conclusion of mining operations, fail to protect biological resources from immediate, ongoing, and potentially irreversible harm. Continuous mining activities over ten years would fragment and severely degrade habitat connectivity, undermining regional conservation efforts.
- **Noise and Community Health:** Noise pollution generated by mining operations—including heavy trucks, conveyors, and equipment—would exceed acceptable levels, adversely impacting nearby residential communities, educational institutions, and senior living facilities. Proposed noise barriers are inadequate in scope and effectiveness. Additionally, airborne particulate matter generated by mining operations significantly increases community health risks, including respiratory illnesses like Valley Fever.
- **Hydrology, Stormwater, and Water Quality:** The Stormwater Quality Management Plan does not adequately detail comprehensive protections necessary to prevent water contamination from mining operations. The potential use of hazardous backfill materials such as asphalt and concrete significantly increases the risk of contamination to groundwater and the Sweetwater River watershed. Such contamination would have severe implications for local ecosystems and downstream communities reliant upon these water resources.

Conclusion

Given the extensive concerns outlined above, including insufficient project description, fundamental incompatibility with the local community, inconsistency with the Valle de Oro Community Plan and County zoning regulations, and severe environmental impacts, the Valle de Oro Community Planning Group strongly recommends denial of the Cottonwood Sand Mine Major Use Permit (PDS2018-MUP-18-023) and Reclamation Plan (PDS2018-RP-18-001). We urge Planning and Development Services, the San Diego County Planning Commission, and the San Diego County Board of Supervisors to uphold the community's integrity, public health, safety, and environmental sustainability by rejecting this inappropriate and potentially damaging project. Thank you for your thoughtful consideration of our recommendation.

If you have further questions, I can be reached at (619) 403-0889.

Respectfully,



Oday Yousif, Chair

Cc: Monica.MontgomerySteppe@sdcounty.ca.gov
Joel.Anderson@sdcounty.ca.gov
DaniellaT.Hofreiter@sdcounty.ca.gov

Valle de Oro Community Planning Group

Voluntary Sign In Sheet.

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Valle de Oro Community Planning Group

Voluntary Sign In Sheet.

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Valle de Oro Community Planning Group

Voluntary Sign In Sheet.

To Submit
your comment/
complaint

STEVE GASSOTTA	Roy Stamper	Today you sign @ gmail. com
Sharon Cox	Kathy Hayes	
John R Marsh	Laura Durick	
Frances Foster	Tracy Weekley	
Tom Oley	Everett Erleth	
Dave Roman	Cherie Christian-Martinez	
Stephen Reinstein	Danielle Martinez	
Dan & Susan Lutz	Cindy Terhune	
Philip F. Bailey	Kelly Mertes	
Jackie Bailey	Gerry McLean	
Jane + Todd Steen	Eric Sass	
Mark & Karan Lawless	Lisa Griffiths	
Stephen & Carolyn Kapp	Brenda Richmond	
Edith Botz	Linda Schrader	
Betula Ellyha	Jeff Schurr	
Susan Mathay	Sherrie Aldrich	
Gregg Rosner	Dona Aldrich	
Ruth Nelson	Hymie Schneider	
Sam Yl	E. A. S.	
Joanne Stamper	Lee Sherman	
	Henry Powell	

Valle de Oro Community Planning Group Voluntary Sign In Sheet.

Andrew Jeffery	MARK CRIZE
Robert Horton	
LEONARD PINSON	
Bert Bury	
Fordeya McKinney	
MIKE MCKINNEY	
Lute Masten	
Araceli Ruy Sanchez	
Karen Montalvo-Tedema	
Steve Mitchell Lt Cdr USN (Ret)	
Breanne Sickinger	
Preston Brown (JDCPG)	
Brittany Waddell	
Diane Wallace	
Gary Wallace	
RITA HENDRICKSON	
BARRY JANTZ	

ATTACHMENT D

SPEAKER CARD FOR PUBLIC COMMENTS

County of San Diego Valle de Oro Community Planning Group

Please complete and submit this card to the group Chair if you wish to speak on any agenda or non-agendized item. Please keep your comments brief while still communicating your concerns. The time allotted for public comment is two minutes per individual unless otherwise stated by the Chair during the meeting or arranged with the Chair prior to the meeting. Please provide the following information for the purpose of recognizing your comments:

Name: Lori Loiselle

Agenda Item No.: ~~42~~ F1

Comment Summary: reasons it is not in the
best interest of our community

The group Chair will recognize speakers in the order in which speaker cards were submitted. All comments shall be directed at the Chair. The Chair reserves the right to limit public comment. Alternatively, public comment via email or writing may be directed to the Chair, in writing.

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Name: Robert JACOBS

Agenda Item No.: F1

Comment Summary: CONCERN ON

ENVIRONMENT // AFFECT ON WEST SIDE

OF WILLOW GLEN AND AFFECT TO

SWEETWATER RESERVOIR AND COMMUNITIES TO SERVE

The group Chair will recognize speakers in the order in which speaker cards were submitted. All comments shall be directed at the Chair. The Chair reserves the right to limit public comment. Alternatively, public comment via email or writing may be directed to the Chair, in writing.

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Name: Stephen Bickley

Agenda Item No.: F1

Comment Summary: County

purchase for
park & ONE golf

course
The group Chair will recognize speakers in the order in which speaker cards were submitted. All comments shall be directed at the Chair. The Chair reserves the right to limit public comment. Alternatively, public comment via email or writing may be directed to the Chair, in writing.

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Name: BRAD MONROE

Agenda Item No.: F1

Comment Summary: STUDENT ACCESS

The group Chair will recognize speakers in the order in which speaker cards were submitted. All comments shall be directed at the Chair. The Chair reserves the right to limit public comment. Alternatively, public comment via email or writing may be directed to the Chair, in writing.

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SPEAKER CARD FOR PUBLIC COMMENTS

County of San Diego Valle de Oro Community Planning Group

Please complete and submit this card to the group Chair if you wish to speak on any agenda or non-agendized item. Please keep your comments brief while still communicating your concerns. The time allotted for public comment is two minutes per individual unless otherwise stated by the Chair during the meeting or arranged with the Chair prior to the meeting. Please provide the following information for the purpose of recognizing your comments:

Name: ROBERT FOSTER

Agenda Item No.: F1

Comment Summary: against the plan

The group Chair will recognize speakers in the order in which speaker cards were submitted. All comments shall be directed at the Chair. The Chair reserves the right to limit public comment. Alternatively, public comment via email or writing may be directed to the Chair, in writing.

ATTACHMENT D

SPEAKER CARD FOR PUBLIC COMMENTS

**County of San Diego
Valle de Oro Community Planning Group**

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Name: _____

Agenda Item No.: _____

Comment Summary: _____

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Name: Randall Wheeler

Agenda Item No.: F 1

Comment Summary: breathing sand
is harmful to health

The group Chair will recognize speakers in the order in which speaker cards were submitted. All comments shall be directed at the Chair. The Chair reserves the right to limit public comment. Alternatively, public comment via email or writing may be directed to the Chair, in writing.

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Name: Stephen Reinster

Agenda Item No.: F1

Comment Summary: Totally inconsistent
with our community

The group Chair will recognize speakers in the order in which speaker cards were submitted. All comments shall be directed at the Chair. The Chair reserves the right to limit public comment. Alternatively, public comment via email or writing may be directed to the Chair, in writing.

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Name: BARRY JANTZ

Agenda Item No.: F1

Comment Summary: NO ON

SAND MINE

The group Chair will recognize speakers in the order in which speaker cards were submitted. All comments shall be directed at the Chair. The Chair reserves the right to limit public comment. Alternatively, public comment via email or writing may be directed to the Chair, in writing.

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Name: Theresa McKenna

Agenda Item No.: 1

Comment Summary: Health + Safety Concerns

The group Chair will recognize speakers in the order in which speaker cards were submitted. All comments shall be directed at the Chair. The Chair reserves the right to limit public comment. Alternatively, public comment via email or writing may be directed to the Chair, in writing.

ATTACHMENT D

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County of San Diego Valle de Oro Community Planning Group

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Name: Stephen Kapp

Agenda Item No.: #1

Comment Summary: Deny comments -
since not zoning ordinance
conforming or compatible.

The group Chair will recognize speakers in the order in which speaker cards were submitted. All comments shall be directed at the Chair. The Chair reserves the right to limit public comment. Alternatively, public comment via email or writing may be directed to the Chair, in writing.

SPEAKER CARD FOR PUBLIC COMMENTS

**County of San Diego
Valle de Oro Community Planning Group**

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Name: Basil Zetouk

Agenda Item No.: F 1

Comment Summary: _____

The group Chair will recognize speakers in the order in which speaker cards were submitted. All comments shall be directed at the Chair. The Chair reserves the right to limit public comment. Alternatively, public comment via email or writing may be directed to the Chair, in writing.

SPEAKER CARD FOR PUBLIC COMMENTS**County of San Diego
Valle de Oro Community Planning Group**

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Name: Brittany Waddell

Agenda Item No.: F7

Comment Summary: Inadequacy of
environmental impact analysis.

The group Chair will recognize speakers in the order in which speaker cards were submitted. All comments shall be directed at the Chair. The Chair reserves the right to limit public comment. Alternatively, public comment via email or writing may be directed to the Chair, in writing.

SPEAKER CARD FOR PUBLIC COMMENTS

County of San Diego
Valle de Oro Community Planning Group

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Name: Dina Boerle B. Boerle

Agenda Item No.: _____

Comment Summary: The county
should think about the
community welfare before the project

The group Chair will recognize speakers in the order in which speaker cards were submitted. All comments shall be directed at the Chair. The Chair reserves the right to limit public comment. Alternatively, public comment via email or writing may be directed to the Chair, in writing.

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County of San Diego Valle de Oro Community Planning Group

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Name: Lisa Griffiths

Agenda Item No.: _____

Comment Summary: Not the right
thing for our community.

The group Chair will recognize speakers in the order in which speaker cards were submitted. All comments shall be directed at the Chair. The Chair reserves the right to limit public comment. Alternatively, public comment via email or writing may be directed to the Chair, in writing.

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County of San Diego Valle de Oro Community Planning Group

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Name: Joson Feathers

Agenda Item No.: F 1

Comment Summary: Oppose

The group Chair will recognize speakers in the order in which speaker cards were submitted. All comments shall be directed at the Chair. The Chair reserves the right to limit public comment. Alternatively, public comment via email or writing may be directed to the Chair, in writing.

roxana gores <roxsshuttles@yahoo.com>

I'm not able to make the Valley De Oro meeting on
Tuesday March 18th.

I would like to voice my strong disagreement against this proposed sand mine. I've lived and own my homes on Willow Glen Dr since 1977 and my husband since 1976. Over the years we have lived with 2 sand mines and the Robertsons Ready Mix 96/Hesters quarry, which we were told by Joel Cloud it would only be in operation for 15 years and it was going to be a mom & pop operation. Here we are 45 years later still going strong at our expense. After all these years of growth there is no place for another sand mine in the middle of all these houses and apartments! From living across the street from the quarry I've contracted Valley Fever! You NEVER recover from Valley Fever it's with you till death. It can spread throughout your body. My life since getting Valley Fever has drastically changed for the worst. I wouldn't wish this on anyone! It only takes one cocci spore to be inhaled to be infected. So yes Valley Fever is in the soil/sand on Willow Glen Dr. any digging can release the spores. I can't imagine anyone would even think to OK a project like this in the Sweetwater river bottom where the water flows from Loveland Lake down to Sweetwater Lake, thats the main drinking water supply. We know what it's like to live by mining operations. Endless dust, blasting, constantly dealing with truck traffic. Constant noise. Rumbling from conveyor belts. Diesel fumes. And a very large eye sore! Last but most important health issues! Please stop this crazy idea of a sand plant in the middle of our beautiful neighborhood!

Thanks,
Peter and Roxana Gores

Beckysue <rsneary1956@gmail.com>

Hi I live in East County and am concerned about The Cottonwood Sand Mine Project.

It is pretty near an elementary school and senior housing and requires. very large trucks on Willow Road and Jamacha Road, not a good combination.

Probable contamination of Sweetwater River would occur, not "Environmental Justice" for people or wildlife!

Other creative uses I could see, a municipal lower cost golf course, pickleball, baseball, basketball, soccer,, tennis courts., hiking trails, bike trails.

There are a lot of nature reserves in the area, but also as San Diego continues the need for more housing density (very apparent in new homes over off Jamacha) having open space and recreational spaces replaces the "back yard" for urban high density hones.

This area happens to be on bus lines too.

Also a potential vacation RV area like "Camp Land by the Bay" or Pio Pico maybe?

These are all uses likely more acceptable to nearby residents and useful to the County, or if the homeowners in the area want to buy it for a private green space, I would not mind that. I would not be using it but wouldn't be sharing the road with giant trucks with trailers!

Please dont approve the Cottonwood Sand Mine!

Rebecca Neary

Jamul CA 91935

Linda Wilks <paintedpony1889@cox.net>

COTTONWOOD SAND MINE PROJECT

MUP-18-023

MARCH 18, 2025

This project should be denied as the EIR really presents no evidence that anything that is objectionable in it can be mitigated. The acreage is designated Open Space and for recreational use, NOT a sand mine. The present use complies with the three community plans that govern this area. It is completely illogical to tear up the heart of a community that is already in existence to go backwards and allow a sand mine here. This is not progress. The traffic study should be thrown out as it was done during the pandemic. It is impossible to mitigate the environmental lose of endangered fauna and flora. Gone is gone. This also applies to the Native American artifacts. Sand mines are identified under Prop 65 as a health hazard.

99% of the community is against it.

Not the right TIME!

Not the right PLACE!

Not the right PROJECT!

Please stop it now!

Sincerely,

Linda L. Wilks

mikayla.mitchell@gmail.com

This is for tonight's meeting - I am in opposition of the sandmine.

The Environmental and Community Impact of the Proposed Cottonwood Sand Mine in Rancho San Diego

73% decline in wildlife populations since 1970.

The proposed **Cottonwood Sand Mine** threatens Rancho San Diego's air, water, biodiversity, public health, and economic stability. This project, which aims to extract millions of tons of sand from the former **Cottonwood Golf Club**, presents **severe and irreversible risks** to the local environment and residents.

This document outlines the **scientific and economic consequences** of the mine, detailing the long-term damage it will cause to the region's ecology, infrastructure, and public health. The evidence overwhelmingly supports **rejecting** this project.

1. Irreversible Biodiversity Loss

Key Fact: The UN reports that **up to 1 million species** are at risk of extinction due to habitat destruction.

The proposed mine site is a **critical ecological corridor**, home to federally protected wetlands and essential habitat for **endangered species**, including the **least Bell's vireo (Vireo bellii pusillus)** and the **Southwestern willow flycatcher (Empidonax traillii eximus)**. Sand mining operations would **destroy and fragment** this vital ecosystem, pushing already vulnerable species closer to extinction.

Supporting Data:

- The **Global Living Planet Index** has recorded a **69% average decline in wildlife populations** since 1970, primarily due to land degradation and habitat loss (WWF, 2022).
- **Sand mining** leads to an annual **10% decline in species populations** in affected ecosystems (UNEP, 2019).

Destroying this habitat is **permanent and non-reversible**. There is no way to "restore" an ecosystem that has been **entirely excavated**.

2. Air Pollution and Public Health Risks

Key Fact: Crystalline silica dust exposure is linked to lung cancer, COPD, and silicosis.

Sand mining releases **fine silica dust**, a **Group 1 Carcinogen** (World Health Organization), which is proven to cause **lung cancer, respiratory diseases, and premature deaths**.

Nearby communities experience significantly higher rates of **asthma, cardiovascular disease, and neurological disorders** due to prolonged exposure.

Supporting Data:

- A **2021 study by the American Lung Association** found that individuals exposed to silica dust have a **25% increased risk of lung cancer**.
- **Children and the elderly** are the most vulnerable, with long-term exposure causing **irreversible lung damage** and **neurodevelopmental disorders**.

Rancho San Diego residents would be forced to **breathe in these toxins daily**. The community should not become a **test site for industrial air pollution**.

3. Groundwater Depletion and Water Contamination

Key Fact: The U.S. Geological Survey states that **sand mining can permanently lower water tables** and reduce drinking water availability.

San Diego County already faces **severe water shortages**. The Cottonwood Sand Mine would **consume enormous amounts of groundwater**, worsening local drought conditions. Additionally, mining disrupts **natural filtration** processes, introducing **sediment, heavy metals, and contaminants** into aquifers that supply drinking water to humans and wildlife.

Supporting Data:

- A **2021 UNESCO report** found that sand mining is responsible for **up to 40% of groundwater depletion** in affected regions.
- San Diego **imports over 80% of its water**. Any local groundwater loss **further weakens water security** in an already drought-prone region.

Water is **San Diego's most valuable resource**. Allowing an industrial mining operation to **drain and pollute** it is reckless and irresponsible.

4. Economic Consequences and Property Value Decline

Key Fact: Studies show property values near industrial mining operations can drop by **20-40%**.

The presence of a **large-scale industrial sand mine** will cause **immediate property devaluation** in Rancho San Diego. Homes that were purchased in a **residential, green space environment** will suddenly be located next to an **active extraction site**.

Homeowners and businesses will **lose value and potential buyers** due to the **health risks, noise, dust, and environmental degradation**.

Supporting Data:

- A **2020 study from the Journal of Real Estate Finance and Economics** found that homes within **one mile of an active mine** experience a **25% decline in property value**.
- Analysis of similar mines in **Wisconsin, Texas, and California** showed that **local businesses struggle** due to increased dust, noise, and traffic congestion.

For many residents, their home is their **largest financial investment**. The Cottonwood Sand Mine puts that investment **directly at risk**.

5. Traffic Congestion and Infrastructure Strain

Key Fact: The project estimates **200 heavy trucks PER DAY**, worsening congestion and road deterioration.

The **constant flow of heavy mining trucks** along Campo Road and Willow Glen Drive will create:

- **Traffic bottlenecks** and long delays for local commuters.
- **Dangerous road conditions**, with a significant increase in **fatal truck accidents**.
- **Severe road damage**, requiring **millions in taxpayer-funded repairs**.

Supporting Data:

- According to the **U.S. Department of Transportation**, a **single heavy truck causes as much road damage as 9,600 cars**.
- **Fatal crashes involving heavy trucks** increase by **50% in areas with industrial mining operations** (National Highway Traffic Safety Administration, 2022).

This mine will turn **residential streets into a major industrial trucking route**, endangering drivers, pedestrians, and school zones.

6. Coastal Erosion and Increased Flood Risks

Key Fact: Sand mining destroys natural flood barriers, increasing vulnerability to storms.

By extracting millions of tons of sand, the Cottonwood Sand Mine would contribute to **regional erosion** and **disrupt natural water flows**, increasing the risk of **flooding and storm damage** in surrounding areas.

San Diego is already **experiencing climate change impacts**—allowing this mine to **exacerbate coastal erosion and flood risks** is short-sighted and destructive.

7. Threat to Endangered Species

Key Fact: Over 1,000 species on the IUCN Red List are impacted by mining.

This mine directly threatens **multiple endangered species**, including those dependent on riparian and wetland habitats.

Supporting Data:

- **40% decline in bird species** reliant on river ecosystems due to habitat destruction.

Once these species are gone, **they are gone forever**.

8. Climate Change Acceleration

Key Fact: Resource extraction, including sand mining, has tripled since 1970, fueling climate change.

Sand mining is a **major contributor to climate change** due to its destruction of ecosystems that **store carbon and regulate temperature**.

Supporting Data:

- **Dredging releases trapped carbon**, worsening greenhouse gas emissions.

Approving this mine is a step **backward** in the fight against climate change.

Conclusion

The **Cottonwood Sand Mine project is an environmental and public health disaster**. The overwhelming scientific evidence demonstrates that this mine will:

- **Destroy biodiversity**
- **Poison the air and water**
- **Lower property values**
- **Worsen traffic and infrastructure decay**
- **Accelerate climate change**

Given these **undeniable facts**, this project **must be rejected**. Strong regulatory action and sustainable alternatives are the only way forward.

References

- World Wildlife Fund (2022). Living Planet Index Report.
- UNEP (2019). Sand and Sustainability.
- WHO (2021). Crystalline Silica and Occupational Lung Disease.
- U.S. Geological Survey (2021). The Impact of Sand Mining on Groundwater.
- National Highway Traffic Safety Administration (2022). Heavy Truck Traffic and Road Safety Analysis.
- Yale E360. The Hidden Toll of Sand Mining.
- World Economic Forum (2023). The Role of Sand Mining in Flooding.

Hello, Mr. Yousif, I sent this yesterday because I think that at a time when there is a persistent homeless crisis, a carveout for a homeless camp not real close to the community and people in it is a far better use than poisoning the water and air and creating a huge scar on the landscape.

HOMELESS SHELTER BETTER USE THAN SAND MINE

From:<henkinp@earthlink.net>

To:Supervisor Jim Desmond <jim.desmond@sdcounty.ca.gov>, .Supervisor Joel Anderson <joel.anderson@sdcounty.ca.gov>, .Supervisor Terra LawsonRemer <terra.lawson-rem@sdcounty.ca.gov>, .Supervisor Monica Montgomery-Steppe <Monica.MontgomerySteppe@sdcounty.ca.gov>

Cc:FGG PublicComment <PublicComment@sdcounty.ca.gov>

Subject:HOMELESS SHELTER BETTER USE THAN SAND MINE

Date:Mar 19, 2025 11:18 AM

Hi Supervisors,

Apparently, 214 acres on a former Golf Course are coming available and they are proposed for a sand mine. Why do we need all that space for a sand mine? This may be a good opportunity to substitute for the twice rejected Lemon Grove shelter idea.

The residents do not want a sand mine there. Maybe there would be less opposition to a congregate homeless shelter. In addition to the potential health effects, increased traffic impacting emergency vehicle routes, a large scale industrial project will probably cause excessive noise levels. It is also not near a health facility, across fro a liquor store, or as close to a school.

It is worth a second (maybe even a third) look.

Regards,

Paul Henkin

Article:

Rancho San Diego residents rail against proposed project to turn defunct golf course into sand mine

Story by Richard Allyn, KFMB San Diego [3-18-2025]

Residents of Rancho San Diego voiced strong opposition to a proposed plan to convert the Cottonwood Golf Course into a sand mine during a packed community planning group meeting on Wednesday night.

The Valle de Oro Community Planning Group unanimously voted to recommend denying the project, citing concerns over health, traffic, and environmental impacts.

The controversial proposal aims to mine 4.7 million cubic yards of sand over a decade on 214 acres of the current golf course site. Dozens of community members attended the meeting to express their disapproval of the plan, which they believe does not align with the character of their neighborhood.

Opponents highlighted potential health effects, increased traffic impacting emergency vehicle routes, and environmental concerns as primary reasons for their opposition. The planning group's vote to recommend denying the project reflects these widespread community concerns.

In response to the opposition, the project's developer provided a statement to CBS 8, arguing that the proposal would "ultimately transform a defunct golf course property into 200 acres of permanent, preserved open space for the community to enjoy." The developer also emphasized the regional benefits of creating a local sand supply, stating it would

"reduce the increased costs and environmental damage caused by trucking sand in from outside the region and Mexico."

Despite the developer's claims, residents remain unconvinced about the project's merits and its compatibility with the surrounding area.

The proposal will next be reviewed by the San Diego County Planning Commission, which is expected to vote on whether to recommend the project move forward on April 18.



County of San Diego, Planning & Development Services
**COMMUNITY PLANNING OR SPONSOR
GROUP PROJECT REVIEW**
ZONING DIVISION

ATTACHMENT D

Record ID(s): PDS2018-MUP-18-023 ;PDS2018-RP-18-001

Project Name: Design Exception Related to Cottonwood Sand Mine

Project Manager: Christopher Jacobs

Project Manager's Phone: christopher.jacobs@sdcounty.ca.gov

Scope of Review:

Board Policy I-1 states; "groups may advise the appropriate boards and commissions on discretionary projects as well as on planning and land use matters important to the community." Planning & Development Services (PDS) has received an application for the project referenced above. PDS requests that your Group evaluate and provide comment on the project in the following areas:

- The completeness and adequacy of the Project Description
- Compatibility of the project design with the character of the local community
- Consistency of the proposal with the Community Plan and applicable zoning regulations
- Specific concerns regarding the environmental effects of the project (e.g., traffic congestion, loss of biological resources, noise, water quality, depletion of groundwater resources)

Initial Review and Comment:

Shortly after an application submittal, a copy of the application materials will be forwarded to the Chair of the applicable Planning or Sponsor Group. The project should be scheduled for initial review and comment at the next Group meeting. The Group should provide comments on planning issues or informational needs to the PDS Project Manager.

Planning Group review and advisory vote:

- A. **Projects that do not require public review of a CEQA document:** The Group will be notified of the proposed hearing date by the PDS Project Manager. The project should be scheduled for review and advisory vote at the *next Group meeting*.
- B. **Projects that require public review of a CEQA document:** The Chair of the Planning Group will be noticed when an environmental document has been released for public review. The final review of the project by the Group, and any advisory vote taken, should occur *during the public review period*.

As part of its advisory role, the Group should provide comments on both the adequacy of any environmental document that is circulated and the planning issues associated with the proposed project. The comments provided by the Group will be forwarded to the decision-making body and considered by PDS in formulating its recommendation.

Notification of scheduled hearings:

In addition to the public notice and agenda requirements of the Brown Act, the Group Chair should notify the project applicant's point of contact and the PDS Project Manager at least two weeks in advance of the date and time of the scheduled meeting.

5510 OVERLAND AVE, SUITE 110, SAN DIEGO, CA 92123

Building: (858) 565-5920 | Zoning: (858) 694-8985 or PDSZoningPermitCounter@sdcounty.ca.gov

<http://www.sdcounty.ca.gov/pds>



County of San Diego, Planning & Development Services
**COMMUNITY PLANNING OR SPONSOR
GROUP PROJECT RECOMMENDATION**
ZONING DIVISION

ATTACHMENT D

Record ID(s): PDS2018-MUP-18-023 ;PDS2018-RP-18-001

Project Name: Design Exception Related to Cottonwood Sand Mine

Planning/Sponsor Group: Valle de Oro Community Planning Group

Results of Planning/Sponsor Group Review

Meeting Date: March 18, 2025

A. Comments made by the group on the proposed project.

Please find comments attached.

B. Advisory Vote: The Group ☒ **Did** ☐ **Did Not** make a formal recommendation, approval or denial on the project at this time.

If a formal recommendation was made, please check the appropriate box below:

- MOTION:**
- ☐ Approve without conditions
 - ☐ Approve with recommended conditions
 - ☒ Deny
 - ☐ Continue

VOTE: 10 Yes 0 No 1 Abstain 4 Vacant / Absent

C. Recommended conditions of approval:

Reported by: Oday Yousif Position: Chair Date:

Please email recommendations to **BOTH EMAILS**;

Project Manager listed in email (in this format): Firstname.Lastname@sdcounty.ca.gov and to CommunityGroups.LUEG@sdcounty.ca.gov

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<http://www.sdcounty.ca.gov/pds>



Valle de Oro Community Planning Group

3755 Avocado Blvd #187, La Mesa, CA 91941

Oday Yousif, *Chair*

March 18, 2025

Via U.S. Postal Mail & Email: christopher.jacobs@sdcounty.ca.gov

San Diego County
Planning & Development Services
Attn: Christopher Jacobs
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Subject: Recommendation of the Valle de Oro Community Planning Group for the Design Exception Review Related to the Cottonwood Sand Mine Major Use Permit (PDS2018-MUP-18-023) and Reclamation Plan (PDS2018-RP-18-001)

Dear Mr. Jacobs:

On March 18, 2025, the Valle de Oro Community Planning Group (CPG) convened to review the above-referenced Design Exception Review (DER) request pertaining to the proposed Cottonwood Sand Mine Project and Reclamation Plan. Specifically, this DER seeks to waive the requirement to underground overhead utilities along Willow Glen Drive. After consideration of the project materials, discussion with stakeholders, and review of the project based on the criteria in Board Policy I-1 s, the Valle de Oro CPG recommends denial of the Design Exception Review. Outlined below are our detailed comments, organized under the four key criteria we were asked to evaluate.

1. Completeness and Adequacy of the Project Description

The application materials provide a partial explanation regarding the relocation of existing AT&T lines to the SDGE poles on the opposite side of Willow Glen Drive. However, the Valle de Oro CPG finds that the documentation did not provide sufficient justification or supporting studies to demonstrate why undergrounding is infeasible or should be exempted. Our group requires a more robust engineering and cost analysis to confirm that no viable alternatives exist that would preserve community character while minimizing disruption. As currently presented, the request to waive undergrounding lacks sufficient evidence of hardship or infeasibility.

2. Compatibility of the Project Design with the Character of the Local Community

Valle de Oro has consistently emphasized the importance of maintaining a visually cohesive and safe roadway environment. While the applicant posits that using overhead utility lines on existing SDG&E poles is simpler, overhead utility lines often detract from scenic vistas and undermine efforts to reduce visual clutter along Willow Glen Drive. Undergrounding utilities is a long-standing practice that enhances roadside aesthetics and aligns with community goals to preserve and improve neighborhood appearance. Granting an exception to continue overhead lines may undermine these goals and set a concerning precedent for future projects.

3. Consistency with the Community Plan and Applicable Zoning Regulations

Our Community Plan prioritizes infrastructure improvements that promote orderly development, safe travel corridors, and harmonious integration of utilities into the surrounding environment. The applicant's request to waive undergrounding does not demonstrate consistency with these principles,

Valle de Oro Community Planning Group

3755 Avocado Blvd #187, La Mesa, CA 91941

Oday Yousif, *Chair*

which call for utilities to be placed underground where feasible. Additionally, we were not presented with any compelling evidence to indicate that zoning or relevant planning documents would support an exception for overhead utility lines in lieu of underground infrastructure. On the contrary, current policies trend toward undergrounding for aesthetic, safety, and environmental considerations whenever possible.

4. Specific Concerns Regarding Environmental Effects

The request to waive undergrounding also raises several environmental and community-impact concerns: **Traffic Disruption:** Although the applicant claims that overhead line work will lessen construction impacts, an incomplete analysis was provided for how project construction would be managed if undergrounding proceeded. Without a thorough traffic control plan for either scenario, it is difficult to weigh short-term disruptions against the long-term benefits of underground utilities.

Visual Resources: Preserving open viewsheds and reducing visual blight is a stated priority within our community. Overhead lines are at odds with these objectives. **Public Safety:** Underground utilities may reduce the risk posed by downed lines during storms or high winds. The project materials did not fully address how overhead lines would be protected, nor did they address potential long-term maintenance concerns. The request also poses a possible greater fire risk considering the current and future vegetative state of the site, which is largely overgrown, unmaintained, and often at greater risk due to unhoused populations. This risk is especially heightened considering the Draft EIR presents a fire protection plan from 2021.

Conclusion and Recommendation

Based on our analysis of the project using the four criteria outlined by Board Policy I-1, the Valle de Oro Community Planning Group recommends denial of the Design Exception Review request to waive the requirement for undergrounding overhead utilities along Willow Glen Drive. We strongly encourage the applicant to provide a more thorough feasibility analysis of undergrounding the lines, including robust cost, engineering, and environmental data, and to pursue design solutions that align with both County requirements and community expectations. We appreciate the opportunity to provide input, and we look forward to continued collaboration to ensure that future development within Valle de Oro remains consistent with our community's vision and standards.

If you have further questions, I can be reached at (619) 403-0889.

Respectfully,



Oday Yousif, Chair

Cc: Monica.MontgomerySteppe@sdcounty.ca.gov

Kdmf@sdcounty.ca.gov

DaniellaT.Hofreiter@sdcounty.ca.gov

SPRING VALLEY COMMUNITY PLANNING GROUP

P.O. Box 1637, Spring Valley, CA 91979-1637



Date: March 25, 2025

From: Spring Valley Community Planning Group
Christopher Pierce, Chair (svcpg4@gmail.com)

To: Christopher Jacobs (Christopher.Jacobs@sdcounty.ca.gov)
Land Use/Environmental Planner III – Project Planning
County of San Diego - Planning & Development Services (PDS)
5510 Overland Avenue, Second Floor
San Diego, California 92123

CC: StopCottonwoodSandMine.org (info@stopcottonwoodsandmine.com)

Subject: Cottonwood Sand Mining Project Major Use Permit (PDS2018-MUP-18-023);
Reclamation Plan (PDS2018-RP-18-001); and Design Exception Request (DER) to waive
the undergrounding of overhead utilities

At the March 25, 2025 meeting of The Spring Valley Community Planning Group SVCPG), the group formally adopted the position that the Cottonwood Sand Mine Major Use Permit application should be denied. The vote to send this letter was 12 Yes, 0 No, 2 Absent, and 1 Vacant.

The SVCPG agrees that the Cottonwood Sand Mining Project Environmental Impact Report (EIR) is a flawed and incomplete document that does not adequately analyze the significant environmental impacts of the potential Project to the people, wildlife, water, air, and roads of multiple communities.

Additionally, the Sand Mine Project does not propose adequate mitigation measures or alternatives to address those impacts. The EIR does not comply with applicable goals, policies or requirements of the San Diego County General Plan as well as the Valle De Oro Community Plan.

Upon review, the SVCPG believes the EIR is incomplete and not in compliance with CEQA and therefore must be revised and reissued to the public for review.

The most significant issues of concern to residents regarding the Cottonwood Sand Mining Project EIR include:

1. Transportation / Traffic is a significant environmental impact with incomplete analysis.
2. The health risk associated with Valley Fever is drastically minimized in the EIR.
3. The EIR appears to gloss over the impact on air quality as not being significant. Even a moderate impact could be catastrophic and should be considered and studied.

SPRING VALLEY COMMUNITY PLANNING GROUP

P.O. Box 1637, Spring Valley, CA 91979-1637



4. The proposed Project is inconsistent with the Land Use Element of the County of San Diego General Plan. The designation for the entire project site is Open Space-Recreation which applies to large, existing recreational areas and allows for active and passive recreational uses.
5. The proposed project is inconsistent with the Valle de Oro Community Plan.
6. The EIR did not adequately address how its proposed sand mining activities will conserve rather than destroy wildlife habitats.
7. Biological Resources are significant environmental impacts with incomplete analysis.
8. The EIR states that “the Project would result in significant impacts” to Federally and State Endangered or Threatened Species. Proposed mitigation plans are not sufficient to protect endangered and threatened species in the area.
9. Noise is a significant environmental Impact with incomplete analysis.
10. The EIR does not properly address that the Project may have a significant impact to property water wells near the property site.
11. Aesthetics is a significant unmitigable environmental impact.
12. The EIR did not address Emergency Access adequately. The report indicates that a “Traffic Control Plan would establish procedures” however these procedures are not described.

The Spring Valley Community Planning Group stands with thousands of community members who are seriously concerned about the significant impacts the Cottonwood Sand Mining Project’s twelve-year sand mining operation would have on surrounding communities including Spring Valley and La Presa, and to the San Diego National Wildlife Refuge. As much as the sand, for concrete, is a needed commodity, the location proposed by the Applicant seems highly inappropriate. Industrial sand mines do not exist in developed, residential areas – nor should this one at the expense of our community and the environment.

Respectfully,

Christopher Pierce, Chair
 Spring Valley Community Planning Group
Svcpg4@gmail.com
 619-512-2007

Cc: Monica.MontgomerySteppe@sdcounty.ca.gov
 Joel.Anderson@sdcounty.ca.gov
 DaniellaT.Hofreiter@sdcounty.ca.gov

From: [JDCPG Chairman](#)
To: [LUEG, PDS.PlanningCommission](#)
Cc: [Jacobs, Christopher](#); [Anderson, Joel](#); [Hayes, Andrew](#); [Lawson-Remer, Terra](#); [MontgomerySteppe, Monica](#); [Desmond, Jim](#); odayyousif@gmail.com; [Robin Joy Maxson](#); info@stopcottonwoodsandmine.com
Subject: [External] JDCPG Response to Updated Draft EIR for proposed Cottonwood Sand Mine
Date: Wednesday, May 21, 2025 2:41:04 PM
Attachments: [JDCPG Cottonwood Sand Mine Updated DEIR Letter.pdf](#)

Mr. Ashman,

The response to the Cottonwood Sand Mine Updated DEIR from the Jamul-Dulzura Community Planning Group is attached.

In summary, the JDCPG UNANIMOUSLY opposes this project.

Sincerely,

Lisa Hodgson
Chairman
Jamul-Dulzura Community Planning Group

Jamul-Dulzura

Community Planning Group

Unincorporated Area of the County of San Diego

P.O. Box 613, Jamul, CA 91935

County of San Diego
 Planning & Development Services
 5510 Overland Avenue, Suite 110
 San Diego, CA 92123
Ronald Ashman, Chair Planning Commission

May 20, 2025

RE: Cottonwood Sand Mining Project Major Use Permit (PDS2018-MUP-18-023);
 Reclamation Plan (PDS2018-RP-18-001).

Dear Mr. Ashman,

A planned community development would never be approved to be built next to an open pit sand mine. Why are you considering approving an open pit sand mining operation in the middle of an established community?

In August 2023, the Jamul-Dulzura Community Planning Group submitted its comments on the Updated Draft EIR. As we write to you today, the Final EIR for this project has not yet been released and neither our group nor the general public has read the responses from County Planning and Development Services (PDS) to our questions and statements so we are unaware of what changes may have been made. In light of the scheduled June 13, 2025 Planning Commission Hearing date, the Jamul-Dulzura Community Planning Group unanimously opposes this project.

The Cottonwood Sand Mine open pit mining project will threaten our communities and our region with numerous possible hazards for which there is no mitigation. We do not believe the dangerous conditions to which the communities will be subjected can be mitigated. We as a group reject the premise that there is an acceptable level of harm.

1) IMPACTS ON THE COMMUNITIES OF JAMUL-DULZURA

a) Traffic and Road Infrastructure

Our Planning Group has continuously pleaded for years with the County, the State and SANDAG for a comprehensive updated Traffic Study for SR-94. Residents in the back country rely on SR-94 for daily commuting. It is the primary lifeline and link through the region and

badly needed infrastructure improvements keep getting delayed. Jamul Drive is a vital alternative to SR-94 and passes through the heart of the Cottonwood Sand Mine project boundaries. The increasing loads of traffic over the last two decades have put enormous pressure on daily commutes and commercial trucking contributes to slowing the movement of normal traffic. Expanding truck hauling operations will significantly impact this essential transportation and mobility link.

Without a traffic study that includes new project approvals and future potential growth, the DEIR analysis fails to estimate traffic loads and the extent of possible conflicts from adding hauling trucks.

b) Wildland Fires and Emergency Evacuation

The State of California has ranked the Jamul-Dulzura region in the lowest 5% of the most difficult places from which to evacuate during a wildland fire. Topographically, our region is a series of ascending valleys through hills and mountains and is designated as either High or Very High Fire Hazard Severity Zone (VHFHSZ). It is an historical fire corridor with recurring north-easterly Santa Ann wind-driven fires.

Our biggest concern is the threat of fire entrapment on SR-94 and the tributary routes that lead into it. We are entirely dependent on SR-94 for emergency evacuation. SR-94 routinely backs up for miles from Rancho San Diego to the community of Jamul. In any emergency, vehicle accidents or roadside fires, ingress and egress can come to a standstill all the way to the Otay Lakes Road/SR-94 intersection. This is our greatest vulnerability.

A breakdown of hauling trucks on these roads and their operations at the key chokepoints of Jamul Drive, Steele Canyon Road, Willow Glen Road and SR-94 could stall traffic flow and increase the risk of accidents and roadside fires from backed-up idling cars. Arriving emergency vehicles are constricted by limited maneuverability. Recovery operations take much more time under these conditions.

c) Our Conservation Mission

It is the stated mission of the Jamul-Dulzura Planning Area *“to preserve and protect resources for future generations.”* It is recognized as the most biodiverse area in the continental United States and conservation organizations and government agencies have worked for decades to protect habitat and wildlife and their resources. The newly established conservation area of Village 14 in Proctor Valley borders the San Diego National Wildlife Refuge that connects to the Sweetwater River/Cottonwood Basin and forms our northern boundary alongside the open pit mining site.

These are linked to the myriad of conserved lands to the south and all will be adversely affected in some indeterminable degree. There is no mitigation for this as erosion of habitat and degradation to endangered species is inevitable.

d) Health Risks

Studies completed in Los Angeles back in the 90’s found that smog pollutants in vehicles were higher than outside. For all commuters and travelers through the mining site on Jamul Drive there is no escaping absorption of either silica dust or the presence of spores of soil dwelling fungus. Quality of life will be greatly reduced for at least a decade and for some forever. The

noises emanating from sand pit operations will have a significant impact on the surrounding community.

2) DELIBERATION AND CHOICES

The choice is clearly in favor of protecting to the fullest extent the human communities and natural communities that have come to thrive here and also to protect the outlying communities from the cumulative negative impacts. For our Jamul-Dulzura Community, under threat of wildfire entrapment, it will be disastrous. Once approved, the door is open for extensions and permit renewals. A new precedent would be set to prioritize a singular industrial interest over an established community.

The Jamul-Dulzura Community Planning Group unanimously opposes this project.

Respectfully,



Lisa Hodgson

Chairman
Jamul-Dulzura Community Planning Group
jdcpgchairman@gmail.com

Cc: PLANNING AND DEVELOPMENT SERVICES

PDS.PlanningCommission@sdcounty.ca.gov

Ronald Ashman, Chair, D-2

Michael Edwards, Vice Chair, D-2

Molly Weber, D-3

Yolanda Calvo, D-4

David Pallinger, D-5

Christopher Jacobs, Christopher.Jacobs@sdcounty.ca.gov

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COMMUNITY PLANNING GROUPS

Chair Oday Yousif, Valle do Oro CPG, odayyousif@gmail.com

ASSOCIATION OF PLANNING GROUPS

Chair Robin Joy Maxson, robinjoymaxson@gmail.com

OTHERS:

info@stopcottonwoodsandmine.com

March 18, 2025

To the Valle de Oro Community Planning Group,

“Stop Cottonwood Sand Mine”, a civic non-profit organization representing thousands of residents, is here today to respectfully present critical evidence that clearly shows the Cottonwood Sand Mine Major Use Permit application is unsuitable for approval based on the factors outlined in Section 7358 of the County of San Diego Zoning Ordinance. As per the ordinance, before granting a use permit, the granting authority must make favorable findings concerning several factors, including impacts on the surrounding environment, neighborhood character, and public facilities. After careful review, it is evident that favorable findings cannot be made regarding the following required factors therefore the Cottonwood Sand Mine permit application should be denied.

1. Incompatibility with Surrounding Area

The Cottonwood Sand Mine project is fundamentally incompatible with the surrounding area. Rancho San Diego, which has a population of over 21,000 residents, is characterized by suburban residential neighborhoods, schools, and recreational facilities. It is an area valued for its natural beauty, including scenic hillsides, the Sweetwater River corridor, and expansive open spaces. The proposed sand mine would introduce significant industrial operations to this peaceful, residential community, which is in direct conflict with the existing neighborhood character.

The mining operations, with a proposed 100-foot setback from residences, are far too close to sensitive receptors like schools and senior living facilities. The San Diego Region Aggregate Supply Study recommends a much greater setback of 1,300 feet to mitigate noise, but even this would not fully mitigate the significant noise and dust impacts that would inevitably degrade the quality of life for residents. In fact, the project's environmental documents acknowledge that the aesthetic impacts would be "significant and unmitigable" for more than 12 years, highlighting the long-term and irreversible harm this project would inflict on the community's visual character.

2. Inadequate Public Facilities and Services

The County of San Diego's regulations require that public facilities and services be adequate to support a proposed use. In the case of the Cottonwood Sand Mine, this is not the case. The roads, water, sanitation, and other utilities are not equipped to handle the demands of this large-scale industrial operation. The streets, including Willow Glen Drive, are already strained by existing mining operations, and the additional 146 truck trips per

day would exacerbate congestion, air pollution, and noise in the area, creating hazards for local residents and schools.

Moreover, there is insufficient emergency response infrastructure for the type of industrial activity proposed in such a densely populated area. The County's Planning and Safety requirements would not be met without drastic investments in infrastructure that have not been proposed or accounted for in the project application.

3. Harmful Effect on Neighborhood Character

The proposed sand mine would irrevocably change the character of the Rancho San Diego community. It would introduce an industrial activity into a primarily residential area, conflicting with the goals of preserving open space, protecting wildlife, and maintaining the suburban ambiance that residents value. The proximity of sensitive land uses—such as schools, parks, and the National Wildlife Refuge—would further exacerbate these conflicts.

The project would also have a devastating impact on the Willow Glen Drive Scenic Highway, which the Valle de Oro Community Plan specifically aims to protect. The aesthetics of this area would be significantly harmed by the industrial nature of the mine, which would create a stark contrast with the surrounding natural and residential landscapes.

4. Traffic Impacts and Inadequate Road Infrastructure

The Cottonwood Sand Mine would generate significant traffic impacts on an already congested road network. The proposed 146 daily truck trips would add substantial stress to streets that are not designed to handle such industrial traffic. The traffic analysis presented in the project documents is outdated, based on surveys conducted during the COVID-19 pandemic when traffic patterns were altered. These analyses do not accurately reflect current traffic conditions, and therefore, the full scope of the traffic and safety impacts has not been adequately assessed.

Moreover, existing traffic from nearby mining operations, such as Robertson's Ready Mix and Hester's Granite Pit, is already overwhelming local streets. The addition of a large-scale sand mine would only worsen traffic safety, congestion, and air quality for thousands of residents, including children and senior citizens.

5. Unsuitability of the Site

The project site is located in an area designated as Open Space and part of the County's Biological Resource Core Area (BRCA). This is a high-value habitat corridor that supports sensitive plant and wildlife species. The proposed sand mine would fragment and degrade these important ecological areas, further threatening the viability of the region's wildlife and natural habitats.

In addition, the site is located within the floodplain of the Sweetwater River, an area intended for conservation, not industrial development. This raises concerns about the project's potential to disrupt hydrological functions, such as groundwater recharge, and increase the risk of flooding and water pollution. The County's General Plan, Valle de Oro Community Plan, and Multiple Species Conservation Program (MSCP) all prioritize the preservation of these sensitive lands. The Cottonwood Sand Mine is fundamentally incompatible with these planning goals.

6. Inconsistency with County General Plan and CEQA Requirements

The Cottonwood Sand Mine project is inconsistent with several key goals and policies of the County General Plan, particularly those related to conservation, open space, and land use. The General Plan emphasizes the preservation of sensitive habitats and the avoidance of industrial uses in areas with high ecological value. The proposed mine would destroy critical habitats and fail to provide the necessary buffers between industrial and residential uses, undermining the goals of the General Plan.

The project's Environmental Impact Report (EIR) fails to meet California Environmental Quality Act (CEQA) requirements. It neglects to properly analyze the long-term environmental impacts of the mining operations, including air quality, noise, and impacts on sensitive species. The EIR's traffic analysis is based on outdated data, and the report does not adequately explore alternative project locations or mitigation measures that could reduce the project's harmful impacts.

In conclusion, the Cottonwood Sand Mine Major Use Permit application fails to meet the necessary criteria outlined in the County of San Diego Zoning Ordinance. The project is incompatible with the surrounding community, would create significant environmental and traffic hazards, and is inconsistent with the County's long-term planning goals. For these reasons, we respectfully urge the Valle de Oro Community Planning Group to recommend denial of this project's Major Use Permit application and to uphold the principles of responsible development that prioritize the health, safety, and quality of life for all residents of Rancho San Diego and beyond.

Thank you for your consideration.

Elizabeth Urquhart, Chair

Stop Cottonwood Sand Mine

info@stopcottonwoodsandmine.org

<https://stopcottonwoodsandmine.org>



4350 La Jolla Village Drive, Suite 110
San Diego, CA 92122

Telephone: 858.625.0100
Facsimile: 858.625.9243

May 14, 2025

VIA MAIL and EMAIL

Mr. Mark Slovick
Deputy Director
Mark.Slovick@sdcounty.ca.gov

Ms. Ashley Smith
Chief Project Planning
Ashley.Smith2@sdcounty.ca.gov

Planning & Development Services
5510 Overland Drive, Suite 210,
San Diego, CA 92123

Re: COTTONWOOD SAND MINE PROJECT - Final ENVIRONMENTAL IMPACT REPORT
PDS2018-MUP-18-003 PDS2018-RP-18-001 PDS2018-ER-18-19-007 SCH# 2019100513

Dear Mark and Ashley;

As you know PacVentures Inc.'s affiliate, PV Ivanhoe, LLC, owns 170.7-acres adjacent to the Cottonwood Mining project, located in the Valle de Oro Community planning area. Over the past several years we have been in touch with department staff regarding various aspects of this project. In February of 2022, our attorney Cindy Eldred submitted a detailed letter of comment regarding potential impacts to our property which in our opinion had not been sufficiently assessed in the draft EIR. The attached letter from 2022 raised three issues: deficiencies in the hydrology assessment in regard to the Sweetwater River, incomplete assessment of potential noise impacts to our property, and finally, despite the fact that our project had been timely filed prior to Cottonwood's, the proposed sand mine's impacts to our proposed housing project were not specifically acknowledged or addressed.

We have attempted to engage with staff a number of times in 2022, 2023 and as recently as early April 2025 to discuss Ms. Eldred's letter but have never received a substantive response. With the notice that the Cottonwood project is now scheduled for a Planning Commission hearing for June 13 we believe that the Final EIR has been completed by PDS. Apparently at this point the only way we can determine if our comments have been addressed in the EIR is to see for ourselves.

Please provide me with an electronic copy of the Final EIR as soon as possible so we can decide if we need to attend and comment at the upcoming hearing. In addition, if our comments were not addressed in the revised EIR, we'd like to know why.

Regards,

A handwritten signature in black ink that reads "Kevin Wechter". The signature is written in a cursive, flowing style.

Kevin Wechter

Encl

Cc: Lee Vance (via email)
Cindy Eldred (via email)
Brooke Miller (via email)

Cynthia L. Eldred, APC
Practice limited to California law

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VIA ELECTRONIC MAIL ONLY

February 27, 2022

County of San Diego
Planning & Development Services
5510 Overland Ave., Suite 310
San Diego, CA 92123
ATTN: Mr. Robert Hingtgen
Robert.Hingtgen@sdcounty.ca.gov

Re: Comments to Draft Environmental Impact Report; Cottonwood Sand Mine; PDS2018-MUP-18-023; PDS2018-RP-18-001; Log No. PDS2018-ER-18-19-007; SCH No. 2019100513 (the "DEIR")

Dear Mr. Hingtgen:

We represent PV Ivanhoe, LLC ("Ivanhoe") regarding its ownership and development of a residential community (the "Ivanhoe Ranch Project") on approximately 120 acres of real property ("Ivanhoe's Property") located in the community of Valle de Oro in the unincorporated County of San Diego (the "County"). Ivanhoe's Property lies contiguous to the east and south of the Cottonwood Sand Mine project (the "Sand Mine Project"), as depicted on Figure 1-2 and other figures of the DEIR.

On behalf of Ivanhoe, we appreciate the opportunity to provide these comments on the DEIR. Please do not hesitate to contact us if you have any questions about the content of this letter.

Detailed information regarding Ivanhoe's Property and the Ivanhoe Ranch Project is readily available to County decision-makers, County staff, and preparers of the DEIR, requiring that potential impacts to Ivanhoe's Property and the Ivanhoe Ranch Project be included in the DEIR's analyses of environmental impacts of the Sand Mine Project.

On May 23, 2018, Ivanhoe submitted to the County an application for a general plan amendment, rezone, tentative subdivision map, site plan, agricultural preserve disestablishment, and a Williamson Act Contract cancellation to entitle development of the Ivanhoe Ranch Project. The project consists of a 120-lot subdivision with 119 new residential units and one existing residence to remain unchanged, 24.97 acres of biological open space, and a private 1.78-acre park with a parking lot.

Mr. Robert Hingtgen
February 27, 2022
Page 2

Ivanhoe's application was deemed complete on June 22, 2018 by operation of law under the Permit Streamlining Act. On April 15, 2021, County staff determined that Ivanhoe's application for the County's approval of the Ivanhoe Ranch Project was also complete under the California Environmental Quality Act ("CEQA").

The County published a Notice of Preparation of an Environmental Impact Report ("NOP") for the Ivanhoe Ranch Project on April 15, 2021, and solicited public comments through May 17, 2021, including in public meetings held on April 29, 2021 and May 17, 2021. The NOP, its CEQA Initial Study, County staff presentation materials published on the County's website and presented at the two public meetings, and other related materials describe Ivanhoe's Property and the Ivanhoe Ranch Project in detail, requiring that potential impacts to Ivanhoe's Property and the Ivanhoe Ranch Project be included in the DEIR's analyses of environmental impacts of the Sand Mine Project.

The DEIR's analyses and conclusions of the Sand Mine Project's impacts to existing drainage patterns within the Sweetwater River floodplain are based on inaccurate information that constitutes a material error, requiring that impacts be re-analyzed, the conclusions of the DEIR reviewed for accuracy, and the results of the new analyses and the confirmed or revised conclusions made available to County decision-makers and the public before decision-makers' consideration of a final environmental impact report and the Sand Mine Project.

DEIR Section 3.1.5 analyzes the Sand Mine Project's impacts to hydrology, drainage, groundwater, and water quality within the project site and vicinity. The section's discussion of impacts to existing drainage patterns within the Sweetwater River floodplain is based on a Drainage Study prepared for the Sand Mine Project and included in the DEIR at its Appendix O (the "Drainage Study"). The discussion of impacts concludes that impacts related to the alteration of drainage patterns, erosion, sedimentation, or flooding on site or off site would be less than significant.

The Drainage Study mistakenly relies upon a Sweetwater River floodplain line shown on the HEC-RAS WORK MAP (the "Work Map") in Appendix O of the DEIR. A copy of the Work Map is enclosed as Enclosure 1 to this comment letter.

The Work Map was not updated to reflect the final Sweetwater River floodplain line in the area of the westerly boundary of Ivanhoe's Property, as determined by the Sand Mine Project's engineers, Rick Engineering Company, and ultimately approved by the Federal Emergency Management Agency ("FEMA"). The error is repeated in Figure 3.1.5-2 of the DEIR.

A copy of FEMA's December 1, 2020 letter to The Honorable Greg Cox, Chairman, County Board of Supervisors, with Flood Insurance Rate Map revision date of April 14, 2021, is enclosed as Enclosure 2 to this comment letter. A figure showing in green FEMA's revised floodplain line is enclosed as Enclosure 3 to this comment letter. The area of the green, revised floodplain line corresponds to the area between the red cross-section lines 210 and 280 of the Work Map, Enclosure 1 to this comment letter.

Mr. Robert Hingtgen
February 27, 2022
Page 3

The DEIR's analyses of the Sand Mine Project's impacts related to the alteration of drainage patterns, erosion, sedimentation, or flooding on site or off site within the Sweetwater River floodplain are in error in their reliance on the Work Map. CEQA requires that the analyses and their conclusion(s) must be based on FEMA's Letter of Map Revision, which is included as Enclosure 2 to this comment letter. As a result, the Sand Mine Project's impacts to the Sweetwater River floodplain must re-analyzed, the conclusions of the DEIR reviewed for accuracy, and the results of the new analyses and the confirmed or revised conclusions made available to County decision-makers and the public before decision-makers' consideration of a final environmental impact report and the Sand Mine Project.

The DEIR's analyses and conclusions of the Sand Mine Project's noise impacts fail to provide required analyses and conclusions regarding impacts to the off-site, reasonably foreseeable future noise-sensitive land uses ("NSLUs") of the Ivanhoe Ranch Project. The DEIR's analyses and conclusions also fail to address all noise impacts to an existing NSLU, Isolated Residence 4. The required additional analyses and conclusions must be made available to County decision-makers and the public before decision-makers' consideration of a final environmental impact report and the Sand Mine Project.

DEIR Subchapter 2.4 analyzes the Sand Mine Project's noise impacts. The first significance threshold, on page 2.4-4, provides that the project would result in a significant direct noise impact if the project would result in the exposure of on-site, off-site, existing, and/or reasonably foreseeable future NSLUs to: (1) exterior noise (including noise from the project when combined with all other noise) in excess of 60 dB CNEL or an increase of 10dB CNEL over pre-existing noise in areas where ambient noise levels are 49 dB CNEL or less; or (2) interior noise in excess of 45 dB CNEL.

NSLUs include residences. There are two existing residences on Ivanhoe's Property, identified as Isolated Residence 3 and Isolated Residence 4 in DEIR Subchapter 2.4. Isolated Residence 4 will remain with development of the Ivanhoe Ranch Project. Development of the Ivanhoe Ranch Project will include construction of 119 new residences, all identified as NSLUs in DEIR Subchapter 2.4. Some of these new residences will be located immediately adjacent to the Sand Mine Project.

DEIR Table 2.4-1 lists Mining Operation Noise Levels as exceeding the 60 dB CNEL limit at Isolated Residence 3, with the conclusion that the Sand Mine Project will result in significant direct noise impacts to Isolated Residence 3. With the mitigation provided for in Mitigation Measure M-N-1, impacts are concluded to be less than significant. The analyses and conclusions on impacts to Isolated Residence 3 appear to be supported by substantial evidence in the record. At this time, Ivanhoe has no comment on impacts to Isolated Residence 3.

However, Ivanhoe does have comment regarding Isolated Residence 4 and on the future residences to be developed in the Ivanhoe Ranch Project. First as to Isolated Residence 4, Figure 2.4-3b depicts a stockpile encroaching into the 400-foot setback line near Isolated Residence 4. Because heavy machinery would be involved in amassing and using the stockpile, the location of

Mr. Robert Hingtgen
February 27, 2022
Page 4

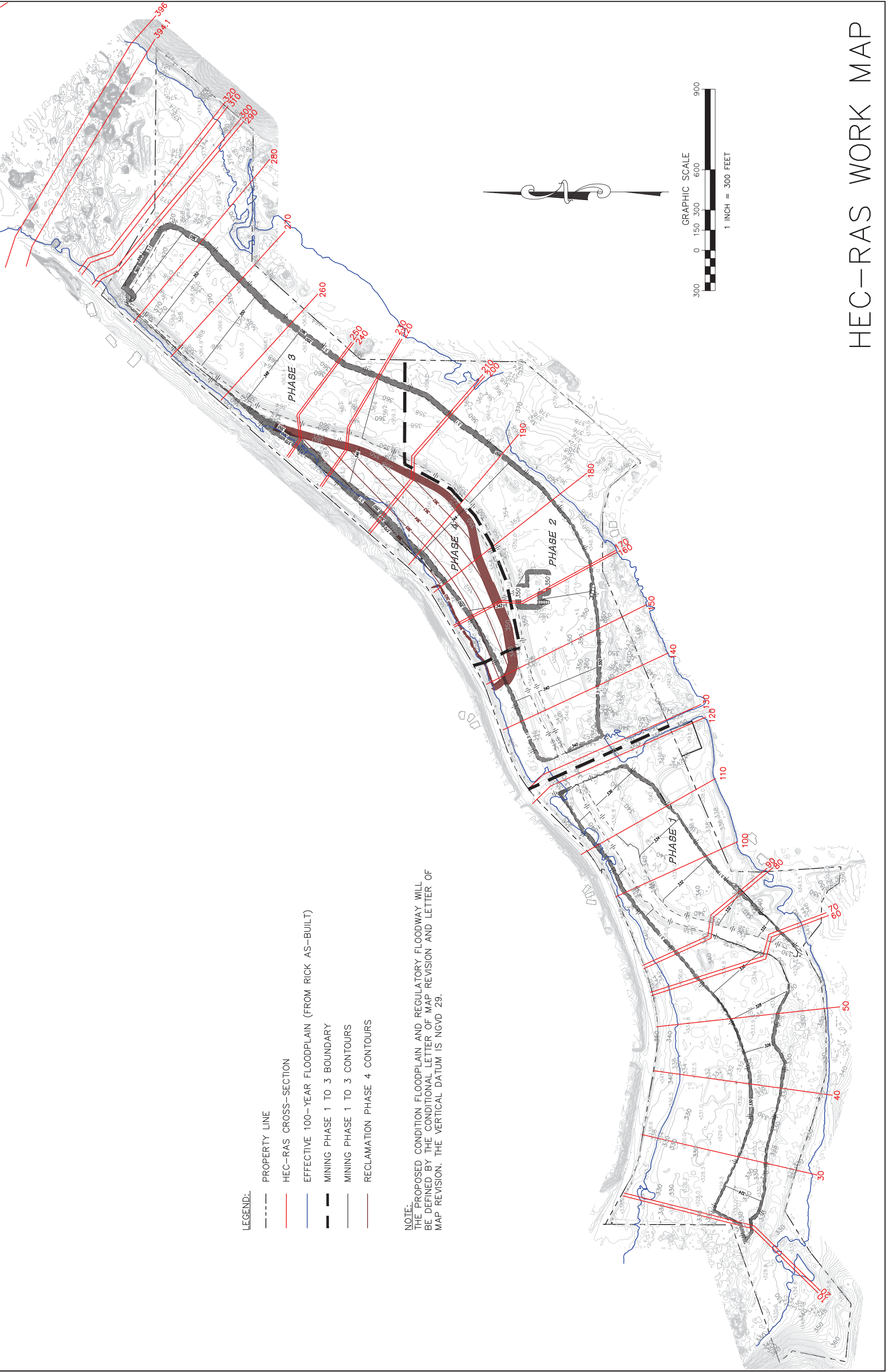
the stockpile raises the question of whether the DEIR correctly concludes that the Sand Mine Project would not result in significant noise impacts to Isolated Residence 4.

Secondly, the applicable significance threshold, summarized above, requires that the DEIR analyze impacts to reasonably foreseeable future NSLUs. The residences to be developed in the Ivanhoe Ranch Project are reasonably foreseeable future NSLUs for reasons summarized in the first issue discussion of this comment letter, among other reasons. CEQA requires that the DEIR analyze the Sand Mine Project's noise impacts to those future NSLUs. The DEIR must provide those analyses and conclusions and make them available to County decision-makers and the public before decision-makers' consideration of a final environmental impact report and the Sand Mine Project.

Very truly yours,



Cynthia L. Eldred, Esq.
THE LAW OFFICE OF CYNTHIA L. ELDRED, APC
cc: (via electronic mail only)
PV Ivanhoe, LLC
Vance and Associates
Juliette Orozco, County Land Use and Environmental Planner





Federal Emergency Management Agency

Washington, D.C. 20472

December 1, 2020

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The Honorable Greg Cox
Chairman, Board of Supervisors
San Diego County
1600 Pacific Highway
San Diego, CA 92101

IN REPLY REFER TO:

Case No.: 20-09-2025P
Community Name: San Diego County, CA
Community No.: 060284
Effective Date of
This Revision: **April 14, 2021**

Dear Mr. Cox:

The Flood Insurance Rate Map for your community has been revised by this Letter of Map Revision (LOMR). Please use the enclosed annotated map panel(s) revised by this LOMR for floodplain management purposes and for all flood insurance policies and renewals issued in your community.

Additional documents are enclosed which provide information regarding this LOMR. Please see the List of Enclosures below to determine which documents are included. Other attachments specific to this request may be included as referenced in the Determination Document. If you have any questions regarding floodplain management regulations for your community or the National Flood Insurance Program (NFIP) in general, please contact the Consultation Coordination Officer for your community. If you have any technical questions regarding this LOMR, please contact the Director, Mitigation Division of the Department of Homeland Security's Federal Emergency Management Agency (FEMA) in Oakland, California, at (510) 627-7211, or the FEMA Mapping and Insurance eXchange toll free at 1-877-336-2627 (1-877-FEMA MAP). Additional information about the NFIP is available on our website at <https://www.fema.gov/flood-insurance>.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick F. Sachibit".

Patrick "Rick" F. Sachibit, P.E., Branch Chief
Engineering Services Branch
Federal Insurance and Mitigation Administration

List of Enclosures:

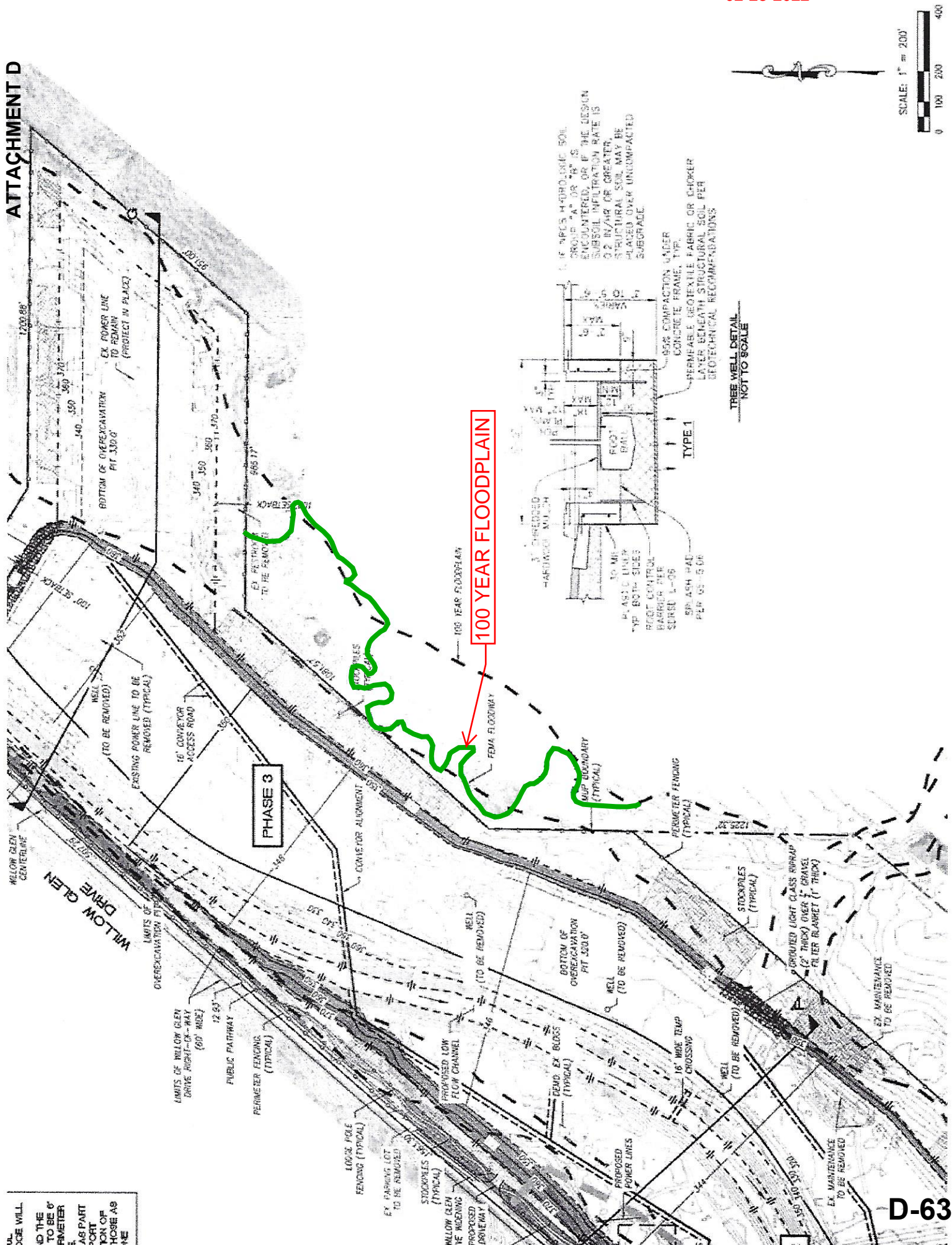
Letter of Map Revision Determination Document
Annotated Flood Insurance Rate Map
Annotated Flood Insurance Study Report

cc: Mr. Greg Carlton, P.E.
Senior Civil Engineer
San Diego County

Mr. Brendan Hastie, P.E., LEED AP
Associate Principal
Rick Engineering Company

Mr. David Montgomery, P.E.
Project Engineer
Rick Engineering Company

ATTACHMENT D



Date: March 20, 2025

From: Steele Canyon Estates Board of Directors
ASPM-San Diego
4079 Governor Drive, Suite 700
San Diego, CA 92122

To: Christopher Jacobs (Christopher.Jacobs@sdcounty.ca.gov)
Land Use/Environmental Planner III – Project Planning
County of San Diego - Planning & Development Services (PDS)
5510 Overland Avenue, Second Floor
San Diego, California 92123

CC: Oday Yousif, Chair – Valle de Oro Community Planning Group (odayyousif@gmail.com)
StopCottonwoodSandMine.org (info@stopcottonwoodsandmine.com)

Subject: Cottonwood Sand Mining Project Major Use Permit (PDS2018-MUP-18-023); Reclamation Plan (PDS2018-RP-18-001); and Design Exception Request (DER) to waive the undergrounding of overhead utilities

The Steele Canyon Estates Homeowners Association Board of Directors, representing 173 homeowners, has formally adopted the position that the Cottonwood Sand Mine Major Use Permit application should be denied.

We believe that the Cottonwood Sand Mining Project Environmental Impact Report (EIR) is a flawed and incomplete document that fails to adequately analyze the significant environmental impacts of the potential project on the people, wildlife, water, air, and roads of our community.

Additionally, the Sand Mine Project does not propose adequate mitigation measures or alternatives to address those impacts. The EIR does not comply with the applicable goals, policies, or requirements of the San Diego County General Plan or the Valle De Oro Community Plan.

Upon review, we believe the EIR is incomplete and not in compliance with CEQA and, therefore, must be revised and reissued to the public for review.

The most significant issues of concern to Steele Canyon Estates residents regarding the Cottonwood Sand Mining Project EIR include:

1. Aesthetics is a significant unmitigable environmental impact.
2. The proposed project is inconsistent with the Valle de Oro Community Plan.
3. Biological Resources are significant environmental impacts with incomplete analysis.
4. The EIR states that “the Project would result in significant impacts” to Federally and State Endangered or Threatened Species. Proposed mitigation plans are not sufficient to protect endangered and threatened species in the area.
5. Noise is a significant environmental Impact with incomplete analysis.
6. The health risk associated with Valley Fever is drastically minimized in the EIR.
7. The EIR appears to gloss over the impact on air quality as not being significant. However, even a moderate impact could be catastrophic and should be considered and studied.



8. The EIR does not properly address that the Project may have a significant impact to property water wells near the property site.
9. The proposed Project is inconsistent with the Land Use Element of the County of San Diego General Plan. The designation for the entire project site is Open Space-Recreation which applies to large, existing recreational areas and allows for active and passive recreational uses.
10. The EIR did not adequately address how its proposed sand mining activities will conserve rather than destroy wildlife habitats.
11. Transportation/Traffic is a significant environmental impact with incomplete analysis.
12. The EIR did not address Emergency Access adequately. The report indicates that a "Traffic Control Plan would establish procedures" however these procedures are not described.

The residents of Steele Canyon Estates stand with thousands of community members who are seriously concerned about the significant impacts the Cottonwood Sand Mining Project's twelve-year sand mining operation would have on the residential community in Rancho San Diego, surrounding communities, and to the San Diego National Wildlife Refuge. As much as the sand, for concrete, is a needed commodity, the location proposed by the Applicant seems highly inappropriate. Industrial sand mines do not exist in developed, residential areas – nor should this one at the expense of our community and the environment.

Sincerely,

Julie Buckshnis, CCAM®
ASPM-San Diego
At the direction of the Board of Directors
Steele Canyon Estates



May 19, 2025

County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

E-mailed to: PDS.PlanningCommission@sdcounty.ca.gov

Dear Commissioners,

The League of Women Voters believes that in order to assure the future availability of essential resources, government policies should promote stewardship of natural resources. Policies that promote resource conservation are a fundamental part of such stewardship. Resources such as water and soil should be protected. Consumption of nonrenewable resources should be minimized. Reclamation and reuse of natural resources should be encouraged.

We further believe that soil and water conservation are essential elements in land management practices. Development should require best management practices for soil and water conservation.

As sand is a nonrenewable resource and extractive mining is not a best management practice for conservation, we are deeply concerned that the proposed sand mining operation threatens to pollute groundwater, degrade surrounding wetlands, and harm the delicate ecosystem of the Sweetwater River and Sweetwater Reservoir, endangering vital water resources and local biodiversity. Therefore, we urge the County of San Diego Planning and Development Services Department to deny the permits for the Cottonwood Golf Course to be converted to an open pit sand mining operation.

Sincerely,

A handwritten signature in black ink that reads "Kim Knox".

Kim Knox
President, LWV of San Diego

A handwritten signature in purple ink that reads "Marian Vega Clancy".

Marian Vega Clancy
President, LWV of N. County San Diego



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PRESIDENT@LWVNCSD.ORG



LWVSANDIEGO.ORG
LWVNCSD.ORG



(858) 483-8696
(760) 736-1608



GROSSMONT-MT. HELIX IMPROVEMENT ASSOCIATION

Preserving the Character of Our Community

May 23, 2025

County Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Regarding: Cottonwood Sand Mining Project

Dear Planning Commission:

The Grossmont-Mt. Helix Improvement Association is writing this letter to express our opposition to the proposed Cottonwood Sand Mining Project. We have numerous concerns about the project.

We understand the proposed mining site will include excavation and processing, Monday through Friday between 7:00a.m. and 5:00p.m., for a minimum of 10 years. The related truck operation is expected to require approximately 176 one-way trips (88 round trips) every business day to move approximately 3.8 million cubic yards of extracted material.

The Grossmont - Mt. Helix Improvement Association (GMIA) is a volunteer organization that represents over 7,000 single-family residences with about 20,000 people. Our region includes the areas east of Bancroft Drive, south of El Cajon, generally north of SR94 and Rancho San Diego, and west of SR54/Jamacha Road, and provides community outreach and engagement.

The proposed project lies less than a mile from our region and will significantly impact our community. We are particularly concerned about the following:

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 added truck traffic;
6. Traffic congestion on our surface streets and our highways;
7. Traffic congestion on our Highway 94 in both directions;
8. Impact on traffic at the 94 and north-bound 125 interchange;
9. Impact on traffic at the south-bound 125/Spring Street approach to east-bound 94; and
10. Increased truck noise, including "jake" braking and turbo whining/whistling.

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

Respectfully,


Anne Krueger
President

SHUTE MIHALY
& WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102
T: (415) 552-7272 F: (415) 552-5816
www.smwlaw.com

CATHERINE C. ENGBERG
Attorney
Engberg@smwlaw.com

September 1, 2023

Via E-Mail

Mr. Christopher Jacobs
Land Use/Environmental Planner
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
E-Mail: christopher.jacobs@sdcounty.ca.gov

Re: Cottonwood Sand Mining Project (PDS2018-MUP-18-023),
(PDS2018-RP-18-001); Log No. PDS2018-ER-18-19-007; SCH#
2019100513

Dear Mr. Jacobs:

We submit this letter on behalf of the Sierra Club San Diego Chapter (“Sierra Club”). As you know, we submitted comments on behalf of Sierra Club on the Recirculated Draft Environmental Impact Report (“RDEIR”) for the proposed Cottonwood Sand Mining Project (“Project”) two weeks ago on August 19, 2023. Our letter included comments regarding the need to employ a different baseline for biological resources due to changed conditions on the Project site that have resulted in substantial areas of healthy Southern Willow Scrub and Non-native grassland, and have altered and improved the Sweetwater River channel. Since then, news articles have been aired and/or published about the Project and the existing biological setting of the project site. As discussed further below, we are writing to inform the County of the relevant news article and to request that you consider these supplemental comments. We request that this letter be entered into the Administrative Record for the Project.

NBC 7 San Diego aired a television news segment and published a news article, both of which discuss the status of endangered arroyo toads in the Sweetwater River downstream from the Loveland Reservoir, where the proposed Cottonwood Sand Mining Project would be located. See the television news segment at this link: <https://www.nbcsandiego.com/videos/storms-water-district-give-hope-to-endangered-san-diego-county-arroyo-toad->

Christopher Jacobs
 September 1, 2023
 Page 2

[species/3290679/?fbclid=IwAR3uoUAsTpyNt_F6xL3jAsurfDavG0JuLbzq2MNQRsbLBmzEDRQ7ZpXMUVs](https://www.species/3290679/?fbclid=IwAR3uoUAsTpyNt_F6xL3jAsurfDavG0JuLbzq2MNQRsbLBmzEDRQ7ZpXMUVs); and the news article attached to this letter as Attachment A. The segment and article (henceforth referred to as “news article”) explain that water releases from the Loveland Reservoir, combined with a rainy winter, resulted in resurgence of the arroyo toad population, because the toads rely on water for breeding habitat. Id. The water flow from Loveland Reservoir, above the golf course to the east, flows through the golf course, and then to the Sweetwater Reservoir below the golf course to the west.

According to Sweetwater Authority Biologist, Pete Famolaro, who has spent decades studying arroyo toads, “[T]his is perfect habitat for the arroyo toad.” Dr. Robert Fisher, a biologist with the U.S. Geological Survey – Western Ecological Research Center, who has also spent his career studying the arroyo toad, indicates that “[The watershed] was occupied by toads and by phenomenal numbers of toad.”

Despite the fact that the County recirculated the biological resources section of the DEIR, the document continued to rely on old surveys. For that reason, mischaracterizes site conditions and describes conditions during and following one of the worst droughts in California history. As evidenced by the attached news article, had the RDEIR conducted updated surveys, the altered conditions described in the attached news article would have been documented and considered in the revised analysis. The changed conditions on the Project site is important information from which to establish a baseline. Once an accurate baseline is established, the County should once again revise the biological resources analysis to accurately analyze the impacts of the proposed mine on the various habitat types and species found within them.

For the foregoing reasons, the Sierra Club urges the County to delay further consideration of the Project unless and until the County prepares and recirculates a revised draft EIR that fully complies with CEQA and the CEQA Guidelines.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Catherine C. Engberg
 Carmen J. Borg, AICP
 Urban Planner

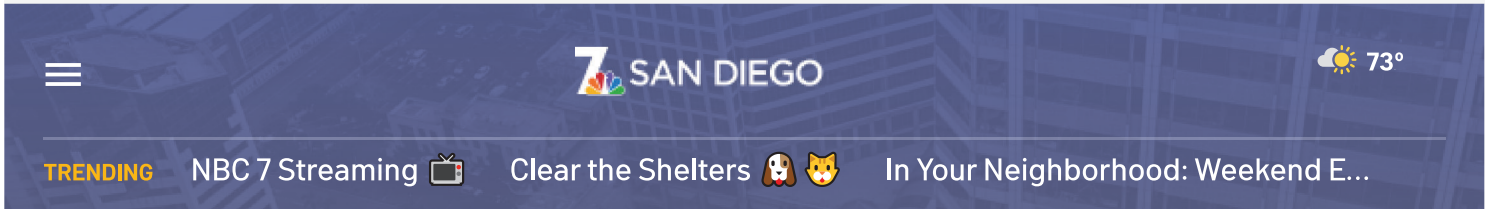
Christopher Jacobs
September 1, 2023
Page 3

Attachment A – *NBC 7 San Diego*, “This endangered toad is experiencing a resurgence thanks to storms like Hilary and a San Diego water district,” August 23, 2023.

https://www.nbcsandiego.com/videos/storms-water-district-give-hope-to-endangered-san-diego-county-arroyo-toad-species/3290679/?fbclid=IwAR3uoUAsTpyNt_F6xL3jAsurfDavG0JuLbzq2MNQRsbLBmzEDRQ7ZpXMUVs

cc: Susan Wynn, USFWS
David Mayer, Regional Supervisor, CDFW
Heather Schmalbach, CDFW
Dahvia Lynch, Director, County Planning & Development Services
Bethany Principe, Coordinator, County Parks and Recreation MSCP Program
Stephanie Neal, County, Sustainability Planning Division
Peter Andersen
George Courser
Dave Hogan
Lisa Ross
Elizabeth Urquhart
Dan Weber
Barry Jantz
Richard Miller

1685767.1

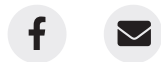


EAST SAN DIEGO COUNTY

This endangered toad is experiencing a resurgence thanks to storms like Hilary and a San Diego water district

The largest populations of arroyo toads are in San Diego County and they're not off the endangered species list yet – but there's hope

By **Joe Little** • Published August 23, 2023 • Updated on August 23, 2023 at 10:46 am



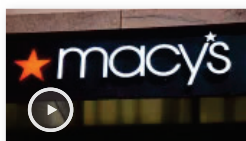
The arroyo toad is not off the U.S. endangered species list – but now there's hope.

An endangered toad in San Diego's East County is having a bit of a resurgence thanks to a couple of storms like Hilary and a large hole in the bottom of a dam.

"This is perfect habitat for the arroyo toad," said Sweetwater Authority Biologist Pete Famolaro while standing in a Sweetwater River watershed near the Loveland Reservoir.

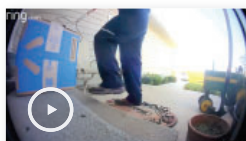
"They're probably about the size of a penny," said Famolaro while holding the tip of his index finger to the base of his thumb.

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Macy's opening new, smaller store in San Diego County



AUG 21

FedEx driver kills rattlesnake balled at customer's front door, video shows

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Famolaro said he's studied the arroyo toad since the 1990s when it first became apparent the species was endangered. The fact that California is regularly hampered by drought doesn't help.

"They need water in order to breed and that's what ties us to the river, is their need to breed," he explained.

Famolaro said a water transfer from the Loveland Reservoir in November got the ball rolling. A valve at the base of the Loveland Dam was opened. Millions of gallons of water were released into the Sweetwater River watershed to head downhill to the Sweetwater Reservoir 17 miles away. The Sweetwater Authority said transfers like the one in November and a [secondary one in the winter](#) saved ratepayers \$11 million.

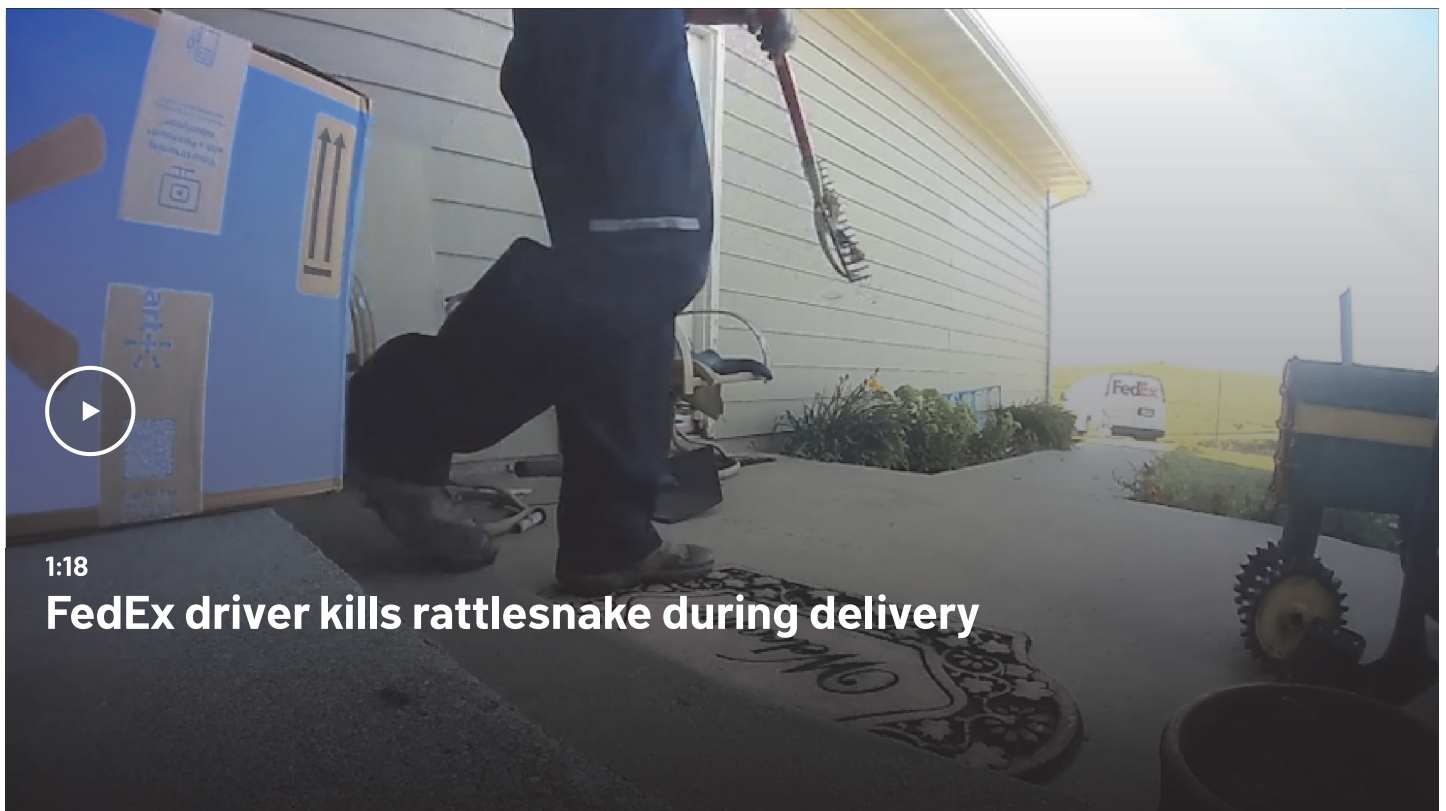
[Downed trees, rockslides, power outages: Hilary brings damage to San Diego County](#)

The water transfer saturated the ground, which allowed unexpected heavy winter rains to create an environment ideal for arroyo toad breeding.

“It was really exciting to see that,” said Dr. Robert Fisher, a biologist with the U.S. Geological Survey – Western Ecological Research Center.

Fisher and Famolaro have studied the toad together for years.

“This toad is very specific to Southern California and to these breeding sites,” said Dr. Fisher. “The largest populations left in the United States are in San Diego County.”



A FedEx driver killed a rattlesnake after delivering a package in Nebraska.

They found the timing of the water transfers and a healthy winter gave the toads enough water and time to replenish their numbers in the watershed -- not enough to take them off the endangered species list, but enough to give them hope.

"[The watershed] was occupied by toads and by phenomenal numbers of toad," smiled Fisher.

"I was like, 'Wow. We finally found a solution. We finally found something that worked,'" agreed Famolaro.

"Let's think about reestablishing them back in places where they used to be," concluded Fisher.



The giraffe born at Brights Zoo in Limestone, Tenn., is believed to be the only solid-colored reticulated giraffe in the world.

This article tagged under:

EAST SAN DIEGO COUNTY • ALPINE • ENDANGERED SPECIES • SWEETWATER AUTHORITY



Resolution 25-29**A Resolution of the Board of Directors of the
San Miguel Consolidated Fire Protection District
Opposing the Proposed Cottonwood Sand Mine Project**

WHEREAS, the San Miguel Fire Protection District ("District") is committed to protecting life, property, and the environment within its jurisdiction, including ensuring safe access and egress, responsible wildfire mitigation, and adequate emergency response capabilities for all residents and communities; and

WHEREAS, the District adopted the Fire Code for the San Miguel Consolidated Fire Protection District, inclusive of the California Fire Code, the International Fire Code, the National Fire Protection Association's Standards, and the County of San Diego Consolidated Fire Code, as Ordinance No. 2019-2 for the protection of the Public's health and safety; and

WHEREAS, the proposed Cottonwood Sand Mine Project ("Project") is located within the area served by the District, namely the South side of Willow Glen Drive, at 3121 Willow Glen Drive, El Cajon, California, a region designated as a Very High Fire Hazard Severity Zone; and

WHEREAS, large-scale mining operations, including blasting, hauling, and heavy equipment use, introduce significant fire ignition risks, particularly during periods of extreme heat, drought, and Red Flag conditions; and

WHEREAS, the increased industrial traffic associated with the Project is anticipated to negatively impact evacuation routes, delay emergency response times, and create congestion on rural roads that serve as critical ingress and egress points during wildfire or other emergencies; and

WHEREAS, the proposed operations could place additional strain on the District's limited personnel and resources, potentially requiring increased staffing, equipment, or mutual aid support without providing offsetting mitigation funding or impact fees; and

WHEREAS, airborne particulates, dust, and emissions generated by mining activity directly related to the Project pose a public health risk to nearby residents and responders, particularly those with respiratory vulnerabilities, and may complicate the District's mission to safeguard Public health; and

WHEREAS, the Project has generated significant opposition from local residents, environmental organizations, and regional public safety advocates due to its cumulative impact on Public health, safety, and wildfire preparedness; and

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of the San Miguel Fire Protection District, that:

- 1) The District formally opposes the Cottonwood Sand Mine Project based upon its potential to adversely impact emergency services due to increased fire risk, interference with emergency response and evacuation infrastructure, and the Project's overall negative impacts to public health and life safety, unless and until the Project meets or exceeds all Public health and life safety concerns outlined by the District, and the Project receives formal approval from the District.

- 2) The District urges the San Diego County Board of Supervisors, Planning Commission, and all responsible permitting agencies to deny approval of the Cottonwood Sand Mine Project unless and until all Public health and life safety concerns of this District are met.

PASSED AND ADOPTED by the Board of Directors of the San Miguel Consolidated Fire Protection District this 14th day of May 2025 by the following vote:

AYES: **Directors McKenna, Muns, Nelson, Pierce, Raddatz and Woodruff**

NOES: **None**

ABSTAIN: **None**

ABSENT: **Director Robles**

ATTEST


Shayna Rians, Board Clerk


Kim Raddatz, Board President

christopher.jacobs@sdcounty.ca.gov

Planning & Developments Services, Attn: Christopher Jacobs,
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Petition in Opposition to the Cottonwood Sand Mining Project

We, who have signed below, are opposed to the approval of a Special Use Permit for Cottonwood Sand Mining Project in Rancho San Diego. We own and board horses in the area and ride the trails in the National Wildlife Refuge. We would be put in danger by the large, loud, moving machinery that would be operating in near proximity to the riding trails. Horses and heavy equipment are not compatible. The noise and movement of heavy equipment naturally frightens horses and can cause them to bolt and run putting them and their riders in danger of injury and/or death. We have ridden these trails for decades in relative safety, and most of us have no other trail riding options. So, we urge you to reject the proposed project.

Name (signed and printed) Susan Leslie Susan Leslie
Address 7314 Stanford Ave City La Mesa Zip 91942
Phone 619 464 8869 Email SOVZZZ1@9mail.com

Name (signed and printed) Kurt Grube Kurt Grube
Address 1831 Cactus Creek St City El Cajon ^{CA} Zip 92019
Phone 619 368-5600 Email Kung22599@gmail.com

Name (signed and printed) Marie Kerrebrock Marie Kerrebrock
Address 11019 Explorer Rd City La Mesa Zip 91941
Phone 619-993-6589 Email mkerrebrock@sandi.net

Name (signed and printed) Shawn McNeil Shawn McNeil
Address 662 E Camden Ave City El Cajon Zip CA
Phone 619-379-2087 Email PatMcNeil1@aol.net

(continued on page 2)

- 2 -

Name (signed and printed) Pamela McNeil Pamela McNeil
 Address 662 E. Camden Ave City El Cajon Zip 92020
 Phone 619-709-2135 Email pammcnei11@cox

Name (signed and printed) Kathleen Pryor KATHLEEN PRYOR
 Address 10417 Moorpark St. City Spring Valley Zip 91978
 Phone 848 299-1380 Email KATHLEENPRYOR@gmail

Name (signed and printed) Patrick Garcia PATRICK GARCIA
 Address 10417 Moorpark St. City Spring Valley Zip 91978
 Phone 619 670-2310 Email burgie6@cox.net

Name (signed and printed) Patricia Garcia PATRICIA GARCIA
 Address 10417 Moorpark St. City Spring Valley Zip 91978
 Phone 619 670-2310 Email burgie6@cox.net

Name (signed and printed) Amanda Garcia AMANDA GARCIA
 Address 12 Mapleview St. City Lakeside Zip 92020
 Phone _____ Email _____

Name (signed and printed) Pamela Tarrel Pamela Tarrel
 Address 12021 Calle De Montano, #191 City El Cajon Zip 92019
 Phone (619) 670-2336 Email nova12021@cox.net

(continued on page 3)

-3-

Name (signed and printed) Kim M Keeler MauryAddress 726 Carlsbad St. Spring Valley, CA 91927 City Spring Valley Zip 91927

Phone _____ Email _____

Name (signed and printed) Gillian Ryan

Address _____ City _____ Zip _____

Phone _____ Email _____

Name (signed and printed) _____

Address _____ City _____ Zip _____

Phone _____ Email _____

Name (signed and printed) _____

Address _____ City _____ Zip _____

Phone _____ Email _____

Name (signed and printed) _____

Address _____ City _____ Zip _____

Phone _____ Email _____

Name (signed and printed) _____

Address _____ City _____ Zip _____

Phone _____ Email _____

christopher.jacobs@sdcounty.ca.gov

Planning & Developments Services, Attn: Christopher Jacobs,
5510 Overland Avenue, Suite 310
San Diego, CA 92123

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Name (signed and printed) Linda Michael LINDA MICHAEL

Address 10123 Grandview St.

City La Mesa Zip 91941

Phone (619) 251-7022 Email LRMICHAEL@CDX.NET

Name (signed and printed) Leslie Baker Leslie Baker

Address 702 Broadway #2204

City San Diego CA Zip 92101

Phone 619-347-1386 Email lesalhof1@gmail.com

Name (signed and printed) Paula R. Kimball PAULA R. KIMBALL

Address 11525 FURY LN #91

City SAN DIEGO Zip 92019

Phone 619-507-9810 Email _____

(continued on page 2)

- 2 -

Name (signed and printed) 101 GARY J AMARAL
 Address 3916 Allen Sch Rd
 City Bonita CA Zip 91902
 Phone 619-267-7755 Email gary@garyamaral.com

Name (signed and printed) ~~Megan Clark~~ Megan Clark
 Address 12310 Spring valley
 City Spring valley Zip _____
 Phone 580-749-0157 Email IKNOWIMMAWRITER@gmail.com

Name (signed and printed) Julie Meyers
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 City Lamesa Zip 91941
 Phone 619-507-2263 Email Julie Meyers619@gmail.com

Name (signed and printed) Randy Meyers
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 City Lamesa Zip 91941
 Phone 619 507-2210 Email Julie Meyers619@gmail.com

Name (signed and printed) Lauren Klepper
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(continued on page 3)

-3-

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Name (signed and printed) Veronica Thompson Veronica Thompson
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 Phone 858-761-7160 Email Veronica CSR@aol.com

Name (signed and printed) CAROL KUBIE CAROL KUBIE
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Name (signed and printed) Cassie Hegy
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Planning & Developments Services, Attn: Christopher Jacobs,
5510 Overland Avenue, Suite 310
San Diego, CA 92123

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Name (signed and printed) Shannon Howard Shannon Howard
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Phone 619-778-0755 Email Shandgwrks@hotmail.com

Name (signed and printed) ~~Shannon Howard~~ ASH Nicole Files Nicole File
Address 506 Kempton St City SV Zip 91977
Phone 619-519-3800 Email nicolehoward1996@gmail.com

Name (signed and printed) Lauren White
Address 6622 Cartwright City San Diego Zip 92120
Phone (619) 820-1340 Email lewhite1010@aol.com

Name (signed and printed) Don A. Balinger (Doreen Balinger)
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(continued on page 2)

- 2 -

Name (signed and printed) Edwin L. Baling EDWIN L BALINGER
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Name (signed and printed) Yolanda Sargent / Yvonne Sargent
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Name (signed and printed) Anna Marie Bartlett Anna Marie Bartlett
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 Phone 619 922-1457 Email mbartlett619@yahoo.com

Name (signed and printed) Barry Rice BARRY RICE
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 Phone 619 647-7401 Email BARRYR3199@YAHOO.COM

Name (signed and printed) Cassie O'Singher
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 Phone 619 772-9063 Email OCassie2002@gmail.com

Name (signed and printed) Kathy Warrington KATHY WARRINGTON
 Address 8220 Vincetta Dr City La Mesa Zip 91942
 Phone 619.994.7011 Email KATHY3WARRINGTON@yahoo.com

(continued on page 3)

-3-

Name (signed and printed) Leslie Waller Leslie h
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Phone 361-877-8012 Email lawe

Name (signed and printed) Scott Waller Scott
Address 3579 Alta Loma Dr. City Jam
Phone 361-813-8909 Email sen

Name (signed and printed) Traci Waller Traci
Address 1810 Marlinda Way City El C
Phone 619-449-3944 Email tw

Name (signed and printed) James Waller James
Address 1810 Marlinda Way City El C
Phone 619-449-3944 Email herl

Name (signed and printed) Simone Waller Simone
Address 8387 University Ave City La M
Phone 619 457 9974 Email roge

Name (signed and printed) Ann Waller Ann
Address 5951 Estelle St. City San
Phone 619 858-254-6681 Email ann

christopher.jacobs@sdcounty.ca.gov

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5510 Overland Avenue, Suite 310
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Address 702 Broadway #2204
City San Diego CA Zip 92101
Phone 619-347-1386 Email lesliebaker1@gmail.com

Name (signed and printed) Paula R. Kimball PAULA R. KIMBALL
Address 11525 FURY LN #91
City SAN DIEGO Zip 92019
Phone 619-507-9810 Email _____

(continued on page 2)

- 2 -

Name (signed and printed) NEW GARY J AMARAL
 Address 3916 Allen Sch Rd
 City Bonita CA Zip 91902
 Phone 619-267-775 Email gary@garyamaral.com

Name (signed and printed) ~~Megan Clark~~ Megan Clark
 Address 12310 Spring Valley
 City Spring Valley Zip _____
 Phone 580-749-0157 Email IKNOWIMMAYWRITER@GMAIL.COM

Name (signed and printed) Julie Meyers
 Address 4178 S. Tropico Dr
 City Lamesa Zip 91941
 Phone 619-507-2263 Email Julie Meyers619@gmail.com

Name (signed and printed) Randy Meyers
 Address 4178 S. Tropico Dr
 City Lamesa Zip 91941
 Phone 619 507-2210 Email Julie Meyers619@gmail.com

Name (signed and printed) Lauren Klopper
 Address 1869 Blue St. El Cajon, Ca
 City El Cajon Zip 92019
 Phone (619) 579-3442 Email lklopper@cox.net

(continued on page 3)

-3-

Name (signed and printed) P.B. Youngberg P.S. Youngberg
 Address 12020 Via Felicia, #
 City El Cajon Zip CA 92019
 Phone (619) 995-5033 Email pennyby1@aol.net

Name (signed and printed) Veronica Thompson Veronica Thompson
 Address 3179 Fair Acres Ln
 City Spring Valley Zip 91975
 Phone 858-261-7160 Email Veronica.csr@aol.com

Name (signed and printed) CAROL KUBIE CAROL KUBIE
 Address 7711 HOMewood PL
 City LA MESA CA Zip 91942
 Phone 619-303-0821 Email QBservices1@aol.co

Name (signed and printed) Cassie Hegy
 Address 2653 Jawgrass St
 City El Cajon Zip 92019
 Phone 619 674 9560 Email Cassieh2cox.net

Name (signed and printed) Erin E. Millikin
 Address 1582 Paseo Aurora
 City San Diego Zip 92154
 Phone 619 863-5044 Email rin15@cox.net

christopher.jacobs@sdcounty.ca.gov

Planning & Developments Services, Attn: Christopher Jacobs,
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Petition in Opposition to the Cottonwood Sand Mining Project

We, who have signed below, are opposed to the approval of a Special Use Permit for Cottonwood Sand Mining Project in Rancho San Diego. We own and board horses in the area and ride the trails in the National Wildlife Refuge. We would be put in danger by the large, loud, moving machinery that would be operating in near proximity to the riding trails. Horses and heavy equipment are not compatible. The noise and movement of heavy equipment naturally frightens horses and can cause them to bolt and run putting them and their riders in danger of injury and/or death. We have ridden these trails for decades in relative safety, and most of us have no other trail riding options. So, we urge you to reject the proposed project.

Name (signed and printed) Shannon Howard Shannon Howard
Address 506 Kempton ST City Spring Valley Zip 91977
Phone 619-778-0755 Email Shandgwrks@hotmail.com

Name (signed and printed) ~~Shannon Howard~~ ASH Nicole Files Nicole File
Address 506 Kempton ST City SV Zip 91977
Phone 619-519-3800 Email Nicolehoward1996@gmail.com

Name (signed and printed) Lauren White
Address 6622 Cartwright City San Diego Zip 92120
Phone (619) 820-1340 Email lewhite1010@aol.com

Name (signed and printed) Doreen Balinger (Doreen Balinger)
Address 4815 51st St City SD Zip 92115
Phone (619) 255-5519 Email EDOREEN@Cox.NET

(continued on page 2)

- 2 -

Name (signed and printed) Edwin L. Baling EDWIN L BALINGER
 Address 4815 51st St City SAN DIEGO Zip 92115
 Phone (619) 255-5519 Email EDOREEN@COX.NET

Name (signed and printed) Yolanda Sargent / Yolanda Sargent
 Address 1432 Corte de las Piedras El Cajon City El Cajon Zip 92019
 Phone (619) 318-5026 Email Yolsarge@gmail.com

Name (signed and printed) Anna Marie Butler Anna Marie Bartlett
 Address 10439 Celestial Waters Dr. City Spring Valley Zip 91977
 Phone 619 922-1457 Email mbartlett619@yahoo.com

Name (signed and printed) Barry Rice BARRY RICE
 Address 11523 FURY LN #108 City EL CAJON CA Zip 92019
 Phone (619) 647-7401 Email BARRYR3199@YAHOO.COM

Name (signed and printed) Cassie Crisinger
 Address 6878 Navajo Rd Unit 103 SD City SD Zip 92119
 Phone 619 772-9063 Email OCASSIE2002@gmail.com

Name (signed and printed) Kathy Warrington KATHY WARRINGTON
 Address 8220 Vincetta Dr City La Mesa Zip 91942
 Phone 619.994.7011 Email KATHY3WARRINGTON@yahoo.com

(continued on page 3)

-3-

Name (signed and printed) Leslie Welles Leslie Welles
 Address 3579 Alta Loma Dr. City Jamul Zip 91935
 Phone 361-877-8012 Email lawelles@mac.com

Name (signed and printed) Scott Welles Scott Welles
 Address 3579 Alta Loma Dr. City Jamul Zip 91935
 Phone 361-813-8909 Email sewelles@mac.com

Name (signed and printed) Traci Williamson Traci Williamson
 Address 1810 Marlinda Way City El Cajon, CA Zip 92021
 Phone 619-449-3944 Email twilliamson@guhsd.net

Name (signed and printed) James Williamson James Williamson
 Address 1810 Marlinda Way City El Cajon Ca Zip 92021
 Phone 619-449-3944 Email harleyd98ju@gmail.com

Name (signed and printed) Simone Rogers Simone Rogers
 Address 8387 University Ave City La Mesa Zip 91942
 Phone 619 457 9974 Email rogers3vs1@gmail.com

Name (signed and printed) Ann S. Dages Ann S. Dages
 Address 5951 Estelle St. City San Diego Zip 92115
 Phone 619 858-254-6681 Email ann.dages@gmail.com

SRG
SENIOR RESOURCE GROUP

Residents of La Vida Real
Senior Living Community
11588 Via Rancho San Diego
El Cajon CA 92019

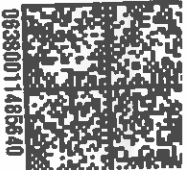
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County of San Diego F
5510 Overland Avenue
San Diego, CA 92123

Attention: Ronald Ashman, Chair

F

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Residents of la vida real se
11588 VIA RANCHO SAN DIEGO
EL CAJON CA 92019

Shipped using PostNet
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RETURN RECEIPT REQUESTED

SHIP county of san diego
TO: 5510 overland avenue
SAN DIEGO CA 92123

JUN 12 2025

Plumbing and
Development Services

USPS CERTIFIED MAIL



9414 7118 9956 0052 2898 51

Part # 167072-435 RRDB EXP 09/25

Dear Mr. Ashman,

Enclosed please find our Resident Petition w/ 87 signatures expressing our deep concern regarding the Cottonwood Sand Mining Project Major Use Permit. We are requesting that you deny this permit. Please see our letter for specific concerns.

ATTACHMENT D

Thank you for serving our community. We are relying on you to do the right thing.

Residents of La Vida Real

Contact person at La Vida Real: Sheila LeCompte Apartment F3069

To: The San Diego County Planning Commission

Ronald Ashman, Chairman

June 5, 2025

Re: Request to DENY the Cottonwood Sand Mining Project Permit

Dear Mr. Ashman,

We, the undersigned request that you take into account our strenuous objections to this potentially devastating project and deny the Major Use Permit for this project.

We object on the following bases:

- The suitability of the site

- The compatibility with surrounding land use

- The scale of the project

- The devastating impact on human health

- The impact on ingress and egress for the surrounding areas

- The yet unforeseen impact of such a huge and long-lasting project

Despite the absence of information from the Environmental Impact Report, common sense would tell us that digging up a golf course and sponsoring hundreds of truck trips per week would have a devastating impact on the surrounding areas—the punishing effect on road surfaces, the profound congestion of already busy roads, the immeasurable harm to air quality and unmitigated noise pollution.

We, the residents of La Vida Real Senior Living Community are already struggling with multiple issues of health and welfare related to the natural aging process. To be further subjected to unforeseeable and unimaginable damages resulting from this commercial enterprise makes this an absolute nightmare of devastating potential.

We are requesting that you place human welfare, environmental safety and good judgment above any economic, commercial consideration. We are depending upon you to do the right thing.

Our request: DENY the Major Use Permit and Reclamation Plan for this disastrous project.

Gratitude to you and to the Board for your service and your thoughtful consideration of our request.

The undersigned are members of the La Vida Real Senior Living Community, 11588 Via Rancho San Diego, El Cajon, CA 92019:

NAME	APARTMENT #
Jane Mootz	C 1023
Shirley O. Compton	F 3069
Joanne West	C 2021
Doreen Schindler	E 2055
Michael Howe	D-1049
Donna K Jackson	A-1002
John M. Davis	F 3064
Dee Ann Paul	G 2079
Kathy Karr	B 3014
Alice Bush	A 2003
Carl Olson	A 1005
Diane Harris	C 3023
Robert Bonner	A 1009
Catherine Johns	D 1048
K. M. Johns	D 1048
Jula Craster	L 3033
Myron & Lela	A 2007
Carla J. Depp	A 1008
Art Depp	A 1008
Leckla McKittrick	A 1007

Gratitude to you and to the Board for your service and your thoughtful consideration of our request.

The undersigned are members of the La Vida Real Senior Living Community,
11588 Via Rancho San Diego, El Cajon, CA 92019:

NAME	APARTMENT #
Lady Nicole	F1070
Rois Gould	E 1054
Janet Pettit	A 3005
Kathy Maguire	E 3056
Mary Botte	Burris Dr. El Cajon
Lucy Rakelotte	Apt. B3013
Wdy Grandmother	G280
Elaine Taber	C2035
Norah E. Bricker	C2507
Marva West	E 2058
Richard Reid	F3070
Ann Richard	D-2049
Russ Richard	B 2049
Sharon White	D 2044
Jls. White	D2047
Ginger Shreve	C 2019
Sherry Kitt	G 3077
Susan Jewell	E 2062
Barbara Rorner	F2071
Benjamin	C 2023

Gratitude to you and to the Board for your service and your thoughtful consideration of our request.

The undersigned are members of the La Vida Real Senior Living Community, 11588 Via Rancho San Diego, El Cajon, CA 92019:

NAME	APARTMENT #
Norma J. Sucheski	Apt. #B2013
Deborah Barker	A2002
Louise Wadburn 6/6/25	C2028
Barbara Copeland 6/6/25	K2127
Nicole Benlaway	H2084
Ed MASON G3083	G3083
Wanda Benlaway	
David E. Van Denter	A2010
Doris Shuck	E3059
Annette Schley	A1010
Pres Slader	E2056
Alan P. Bunn	F1065
Lee Krisk	F1073
Lydia E. Graft	F2074
Meredith Hattings	D3050
R. Hattings	D3050
Jane Hoyt	G2079
Lambert Herman	A2000
Lori Mason	G2076
Wanda Benlaway	G2076

Gratitude to you and to the Board for your service and your thoughtful consideration of our request.

The undersigned are members of the La Vida Real Senior Living Community,
11588 Via Rancho San Diego, El Cajon, CA 92019:

NAME	APARTMENT #
Zella Beth White	B2013
Jan White	B2013
Amelia J. Jenke	B2012
LeBaron Jenke	B2012
Beverly Schula	G1081
Linda Rundell	F2066
Ruth Itsumura	A-2005
Don (Nina Driver)	
Wanda Comung	C2019
Ann Gellan	A2009

Gratitude to you and to the Board for your service and your thoughtful consideration of our request.

The undersigned are members of the La Vida Real Senior Living Community,
11588 Via Rancho San Diego, El Cajon, CA 92019:

NAME

APARTMENT #

*Gerald E. Schulz**61682*



Ms. Sheila Le Compte
11588 Via Rancho San Diego # F3069
El Cajon, CA 92019

ATTACHMENT D

RECEIVED
JUN 13 2025

Planning and
Development Services

County of San Diego
Planning & Development Services
5570 Overland Ave. Suite 110
San Diego CA 92123

Attn: Ronald Ashman, ~~City of San Diego~~ City of San Diego

SAN DIEGO CA 920
11 JUN 2025 PM 5 L



To: The San Diego County Planning Commission
Ronald Ashman, Chairman
June 5, 2025

Re: Request to DENY the Cottonwood Sand Mining Project Permit

Dear Mr. Ashman,

We, the undersigned request that you take into account our strenuous objections to this potentially devastating project and deny the Major Use Permit for this project.

We object on the following bases:

- The suitability of the site
- The compatibility with surrounding land use
- The scale of the project
- The devastating impact on human health
- The impact on ingress and egress for the surrounding areas
- The yet unforeseen impact of such a huge and long-lasting project

Despite the absence of information from the Environmental Impact Report, common sense would tell us that digging up a golf course and sponsoring hundreds of truck trips per week would have a devastating impact on the surrounding areas—the punishing effect on road surfaces, the profound congestion of already busy roads, the immeasurable harm to air quality and unmitigated noise pollution.

We, the residents of La Vida Real Senior Living Community are already struggling with multiple issues of health and welfare related to the natural aging process. To be further subjected to unforeseeable and unimaginable damages resulting from this commercial enterprise makes this an absolute nightmare of devastating potential.

We are requesting that you place human welfare, environmental safety and good judgment above any economic, commercial consideration. We are depending upon you to do the right thing.

Our request: DENY the Major Use Permit and Reclamation Plan for this disastrous project.

Gratitude to you and to the Board for your service and your thoughtful consideration of our request.

The undersigned are members of the La Vida Real Senior Living Community,
11588 Via Rancho San Diego, El Cajon, CA 92019:

NAME	APARTMENT #
Mary Price	D2050
Janet Lamphun	B2096
Regg Mozil	C-2032
Janice Bement	C-2036
Richard Andrade	G 2078
K. Gentry	B1016
William Creech	B1015
Jordan Vela	
Fancy Swann	G3076
GR Senior	B-3015
Debbie Seward	G 3076
Beverly D. Harts A3801	C1020
Carol Baker	K 4120
City of El Cajon	E 2061
Barry McWalter	E 2061
Vade Helton	E3058
Cathy Ann	C 1025
Joy Anthony	C1025
Marie Waters	C 1033

ATTACHMENT D

Gratitude ★ Blessings ★ Friendship ★ Happiness

Inadvertently left
this page of signature
on the copy machine.
It should be included
with our letter &
petition.

La Vida Real Resident
Attn: Sheila
LeCompte
slecompte@
cox.net

Sent by registered
mail - 6-9-25



From: [lesliemurray100](#)
To: [Jacobs, Christopher](#)
Subject: [External] Cottonwood Sand Mine project
Date: Sunday, September 10, 2023 1:22:45 PM

Dear Mr. Jacobs,

My mother is a resident of La Vita Real, a senior living community in Rancho San Diego. I am deeply concerned about the proposed Cottonwood San Mine. The location of a large sand excavation project in a residential community next to schools is troubling enough, but for it to be in such close proximity to the residences of hundreds of elderly people with a multitude of health issues is beyond concerning.

It is hard to believe that this plan is even being considered. The noise, traffic congestion, water and air pollution, and environmental impact on the area will be immense. Add to this the disruption of the quality of life of residents and visitors alike, and it is clear that this is not the ideal location for a project like this.

Please do not approve the Cottonwood Sand Mine proposal.

Thank you for your consideration,

Leslie Murray

From: [Barbara Oberndorfer](#)
To: [Jacobs, Christopher](#)
Cc: [Larry Olds](#); [Jennifer Alkatib](#)
Subject: [External] Re: Cottonwood Sand Mine Project
Date: Monday, November 6, 2023 7:49:36 AM
Attachments: [image001.png](#)

Chris - good morning,

Thank you so much for your immediate response and email.

As you know, both Larry Olds and I met with Miyu Oda-DesHotels at her office last week. She was wonderful and took quite a bit of time learning of our concerns. She was able to address most everything, the Sand Mine Project status being one of our greatest concerns.

I have included my fellow HOA board members in this email. We live in Pasatiempo (Steele Canyon & Willow Glen), which is right in the middle of this proposed disaster. My entire community is vehemently opposed to this. It's vital we stay as informed as possible with any meetings or opportunities for the public to attend.

Chris, as a whole, we have other concerns within our community and I'm hopeful you might be able to provide some guidance. I'll meet with my fellow board members soon and follow up with our questions for your review and input.

Thank you.

Barbara Oberndorfer

On Fri, Nov 3, 2023 at 9:00 AM Jacobs, Christopher <Christopher.Jacobs@sdcounty.ca.gov> wrote:

Good morning, Barbara,

I am a planner at San Diego County, in the Department of Development Services. I understand that you have questions regarding the Cottonwood sand mine project. Feel free to call me at 619-323-8718 so that I may answer your questions directly. Alternatively, feel free to provide your question(s) in writing and I will write back to you.

Thank you,

Chris Jacobs *(he/him/his)*

Land Use/Environmental Planner III – Project Planning

County of San Diego - Planning & Development Services (PDS)

5510 Overland Avenue, Suite 310

San Diego, CA 92123

Phone: 619-323-8718



From: [Caren Rahn](#)
To: [Jacobs, Christopher](#)
Subject: Re: [External] Recirculated Draft EIR for Cottonwood Sand Mine Project
Date: Sunday, November 5, 2023 9:42:42 AM

This is regarding a response I put in, in July. I replied to thread. I put the owner had already ruined a course in Carlsbad I meant "poway".

Thank you so much!

Sent from my iPhone

> On Jul 21, 2023, at 2:27 PM, Jacobs, Christopher <Christopher.Jacobs@sdcounty.ca.gov> wrote:
 >
 >
 > Good afternoon,
 >
 > Thank you for contacting the County of San Diego, Department of Planning and Development Services. Written comments will be compiled as part of the public record and response to comments will be provided in the Final Environmental Impact Report (EIR).
 >
 > Sincerely,
 >
 > Chris Jacobs (he/him/his)
 > Land Use/Environmental Planner III – Project Planning
 > County of San Diego - Planning & Development Services (PDS)
 > 5510 Overland Avenue, Suite 310
 > San Diego, CA 92123
 > Phone: 619-323-8718
 >
 > -----Original Message-----
 > From: Caren Rahn <cjcarebear2006@icloud.com>
 > Sent: Thursday, July 20, 2023 5:27 PM
 > To: Jacobs, Christopher <Christopher.Jacobs@sdcounty.ca.gov>
 > Subject: [External] Recirculated Draft EIR for Cottonwood Sand Mine Project
 >
 > my comment on The Cotton wood sand mine is as follows:
 > This should all be illegal to come into an area where multiple schools are and homes to disrupt and put us more in danger. There already is a sand mine down the way on willow glen by shooting range. It's insane how many semis and how many accidents I have almost seen involving a semi.
 > With this insane project it would raise it all.
 > The man who bought the property to do this should be sued. Disgusting to ruin land people walk through and near schools and not to mention 2 lane roads. Why doesn't he just do it to the Carlsbad course he ruined that's right by the freeway. He only cares about his profit and not all else at stake.
 > I hope you all take into consideration all aspects. Especially all the schools and two lane roads and sand mine that already is in action. It's disgusting and all over money.
 > Please save the land, the kids, the people and nature. Plenty of other sand around in safer areas. Help us matter.
 > Thank you.
 > Concerned resident of area.
 > Caren Rahn
 >
 > Sent from my iPhone

From: opaque_pauses.0o@icloud.com
To: [Jacobs, Christopher](#)
Subject: [External] Cottonwood Sand Mine Project
Date: Sunday, November 5, 2023 4:00:55 PM

Mr. Jacobs

As a resident of La Vida Real I am very concerned about the impact that the Cottonwood Sand Mine project would have on our community. There are issues that would directly affect the residents here. The air quality here in the area is already compromised by congestion and change in global weather. The senior residents here, struggling with the aging process already have breathing, asthma, and other health issues that this would exacerbate. There are other issues that are important to this community. The emergency response is always vital here at La Vida Real. Services will be spread more thin and response time will be compromised. A sand mine and its processing plant is not consistent with this area and its development of beautiful housing and shopping.

Neither the environment, and directly us, should be exposed to what ultimately is a choice being made by our city council.

Sincerely

Mary Osterling

From: [Hagerty, Brian](#)
To: [Jacobs, Christopher](#)
Cc: [Leighton, Aimee](#); [Quinn, Damien B.](#)
Subject: FW: Sales Tax Revenue Opportunity
Date: Tuesday, March 25, 2025 5:02:39 PM

Hi, Chris:

I'm not sure where the Cottonwood Sand Mine project currently stands (<https://www.sandiegocounty.gov/content/sdc/pds/ceqa/MUP-18-023.html>), but our former OFP Director (Janel Pehau) is reminding us that the resulting sales tax revenue could come to the County government if there's a requirement included in the Major Use Permit to place the sand mine sales office in the unincorporated area. Please see below. (Sorry if we've brought this up before, and I've misplaced your response.)

I'm including Aimee (LUEG GFD) and Damien (current Director of OFP, where unincorporated sales tax revenue is monitored) for awareness.

Brian

From: Janel Pehau <jpehau@nationalcityca.gov>
Sent: Tuesday, March 25, 2025 4:12 PM
To: Hagerty, Brian <Brian.Hagerty@sdcounty.ca.gov>
Subject: [External] Sales Tax Revenue Opportunity

Hi Brian,

I think I mentioned this to you before, but because it's been in the news again recently in my area, I wanted to bring it up again. The subject is the proposed sand mining operation at the former Cottonwood golf course in the Rancho San Diego area. I don't have a vested interest in whether it eventually gets approved, but in the event that it does, I would hope there is a condition in the major use permit for the project that requires the sales office for the endeavor to be located somewhere in the unincorporated area so that the County gets the sales tax from the operations. There was a similar situation many years ago while I was still the director of OFP where we learned that a sand mining operation located in the unincorporated area had a sales office in the City of San Diego. The City of San Diego got to enjoy the sales tax revenue while people in the area near the sand mining operation got to put up with lots of noise and truck traffic. Perhaps you could ask the LUEG GFD to look into it.

Thanks,
Janel

Janel Pehau
Financial Analyst
Finance Department



City of National City
1243 National City Blvd., National City, CA 91950
T: 619.336.4246 M: 619.504.6254 | jpehau@nationalcityca.gov
[Website](#) | [Facebook](#) | [Instagram](#) | [Twitter](#) | [LinkedIn](#)

From: [Daniel S. Weber](#)
To: [Jacobs, Christopher](#)
Subject: [External] Objection to Cottonwood Sand Mine Project (PDS2018-MUP-18-023; PDS2018-RP-18-001; Log No. PDS2018-ER-18-19-007; SCH# 2019100513)
Date: Wednesday, May 1, 2024 11:34:46 AM

Dear Mr. Jacobs

I want to express my objection to the above referenced application for the proposed open pit sand mine at the current Cottonwood Golf Course. The possibility of allowing an industrial activity to operate an open pit sand mine across the street from a residential neighborhood (on the north side), next to a residential neighborhood (on its south side) and within one quarter (1/4) of a mile from an elementary school and County Park is not just bad land use planning but is an ecologically disastrous land use for Rancho San Diego and the proximate Jamul and Spring Valley communities as well for the Wildlife Refuges that abut each end of the property on which the proposed sand mine would operate. Just having to think about the prospect of an open pit sand mine causes clearheaded people to shudder at the thought of it.

Should the proposed sand mining operations become a reality, the negative ecological repercussions of an open pit mining operation will never be fully remedied for the surrounding communities or for the 2 wildlife refuges.

San Diego County's adopted Valle De Oro Plan designates the this land is to be used for recreational uses and a buffer for sensitive wildlife/habitat areas in the Jamacha Valley. The road adjacent to the proposed sand mine (Willow Glen Rd.) is designated part of the scenic road system for San Diego County. Willow Glen Rd. and Steele Canyon Rd. are used by bicyclists and running enthusiasts on a regular basis. Bicycle races are also held on roads adjacent to and that bisect the proposed sand mine property. Attached are photos showing these activities taking place on these roads adjacent to Cottonwood Golf Course. These photos were taken during the past year. One photo shows high school students running on the pedestrian trail right next to the proposed for the sand mine. The other shows cyclists using the bike lane next to the proposed sand mine property.

Due to Semi Truck-sized loads of sand and bulldozers excavating of, carrying of and dumping of sand on the sand mine's proposed conveyor belt, these daily recreational activities will be made more dangerous and unhealthy for those San Diego County citizens who utilize the bike lanes and walk ways on Willow Glen Rd. and Steele Canyon Rd. The dust and exhaust fumes generated daily from the 147+/- semi trucks hauling sand, the excavation equipment excavating the sand and the transfers of sand to to truck loading site will cause unhealthy particulates to be caught up in the breeze and to then only further blown around by the vehicular traffic on those streets that are that are adjacent or proximate to the sand mine's operations. Ultimately, resulting in the dust and particulates constantly being deposited on the citizens who live in the surrounding communities and the school children that attend Jamacha Elementary School and children who play at Steele Canyon Park.

To change or ignore the current land use designation is a breach of the County Government's promises not only to the local residents, but to the citizens who come to the area to drive the scenic roads, run and bike next to pleasant open space with out the threat of semi trucks careening past them at 45 to 50 miles an hour on their way to pick up or drop off their next load of loose sand and with out the mining operation despoiling the air, the river and the wild life refuges that the hikers enjoy when communing with nature.

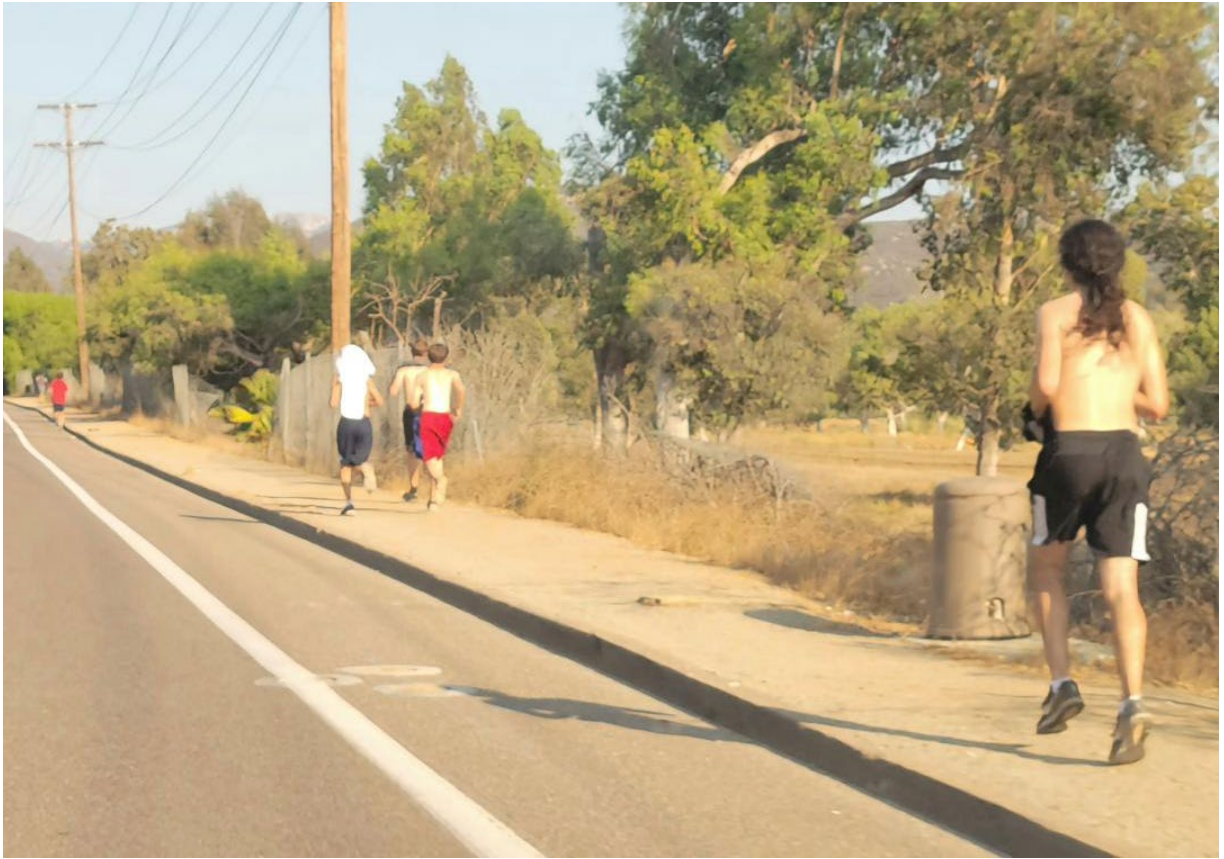
Please realize that there is no solution to the environmental damage this proposed mine will cause to the outdoor activities that the residents of San Diego County wish to enjoy in the Jamacha Valley. There is no viable way to that these proposed mining operations and its related activities can be conducted in a environmentally safe manner for the the 42,598 residents of Rancho San Diego, a substantial portion of the 8,624 residents of Jamul that are proximate to the southern edge of the proposed open pit sand mine nor for many of the residents of Spring Valley who live near the of the western end of of the proposed open pit sand mine or for any of the hundreds of San Diego County Citizens that utilize the streets and walkways for running, walking, hiking or biking next to or in the surrounding neighborhoods next to or school playgrounds near this proposed open pit sand mining operation.

For the protection of the health of the residents of San Diego County, this application must be denied.

Respectfully submitted,

Daniel S. Weber, Esq.
Goria, Weber & Jarvis
1011 Camino del Rio South, Suite 210
San Diego, CA 92108
(619) 692-9200







From: [Rosner, Gregg](#)
To: [Jacobs, Christopher](#)
Cc: [Rosner, Gregg](#)
Subject: Cottonwood Sand Mine and COSD CAP
Date: Friday, May 31, 2024 9:22:44 AM

Hi Chris,

I've been thinking about this mine proposal, and wanted to put out some ideas I have as an alternative to a sand mine. Please note, these are my own thoughts and have nothing to do with my position with the Treasurer Tax Collector nor are endorsed by the same. I'm a native San Diegan and want my home to remain a great place to live.

First, I believe that this property could make a tremendous contribution towards the County of San Diego's Climate Action Plan, but that would require the property be managed by the County and County Partners. I recognize the implications there but think it should be given serious consideration.

That said, with regards to the actual sand mine proposal I have a few questions:

1. If it were approved, what would their proposed mitigation actually look like, and what would be the next incarnation for the property after mitigation were completed? A new golf course? A housing development in the riverbed? Commercial development? A nursery, vacant land, a new stadium for the Chargers to come back to?
2. The sand from the mine is intended for use in cement production, but making cement itself is a tremendous producer of GHG as well as an emitter of all sorts of other toxic pollutants, pollutants that poison our communities, degrade our natural and green spaces and impose additional pressure and stress on those natural GHG mitigants, aka trees, and other CO2 fixers. The mining itself will degrade GHG mitigation, the products of that mine will degrade mitigation even more, how does that fit into the County of San Diego's Climate Action Plan?
3. Governor Newsom has [unveiled a plan](#) for capturing water and defending against weather extremes, I wonder how removing all of that sand that filters the Sweetwater River drainage and recharges (to some extent) the underlying aquifer will add to the Governors plan? One of the priorities in the plan is "[s]upporting local communities to successfully implement the Sustainable Groundwater Management Act of 2014" and I can't imagine removing that sand is going to help meet that particular priority.

The **CAP** is not just about reducing greenhouse gas emissions, but also sequestration of GHG, and equally as important, strengthening the ecosystems of our County to better face the challenges of the ongoing climate changes we face in the future. Zero carbon emissions by itself will not fix the GHG problem. We need to have proactive or positive impacts on those gases. We need more carbon storage, converting grass fairways to an oak, sycamore, and pine greenland and viable watercourse will surely result in a net increase in carbon storage.

Chapter 04 of the **CAP, GHG Emissions Reduction Measures** discusses the facts and figures, the

sectors and goals and benefits and potentials that we all hope will help the “County to be a leader in the effort to address climate change.”

Cottonwood Golf Club presents a great opportunity for the County to move forward in that goal, by first **not** becoming a GHG source directly through mining activities and trucking of sand through the communities of the East County, and indirectly thru the production of Portland Cement at some unspecified locations in the County. The applicant has said that the sand would be used locally to help address the regions “skyrocketing housing and infrastructure construction costs by providing local sand supplies” (East County Magazine July 2023 Articles “Cottonwood Sand Mine Project Brings Strong Opposition From East County Residents”).

Per the **CAP**, I believe that the *Sectors of Water and Wastewater, Agriculture and Conservation*, as well as *Energy*, are ones that would be impacted by my alternative to a sand mine plan. Here is a partial list:

Energy – Replacing the golf course clubhouse and restaurant facilities and their energy uses, lights, kitchens, golf cart charging, air conditioning etc., with open space in various guises such as a partial incorporation into the San Diego National Wildlife Refuge, a Sweetwater River parkland, Native Plant gardens, a working Demonstration Project for returning portions of the property to Native plant open space, Oak Tree plantings, walking and hiking trails, and more, will by itself reduce energy use in this unincorporated part of the County.

Water and Wastewater – Removing all that sand, sand that filters the Sweetwater River and all the runoff from the surrounding communities from the Sycuan Reservation thru Willow Glen, from Jamul through Rancho San Diego, will surely impact water quality. How much water will the sand mining operations use, tamping down dust, controlling wind erosion, cleaning equipment and so on, to impact the adequacy of the water supplies in the area, even if they were to use only reclaimed water.

Agriculture and Conservation – I look at the fairways and greens at the eastern end of the golf courses, and I see trees, Oak and Cottonwood and Sycamore, all native trees, making wood, fixing carbon from the air, creating an ecosystem that maintains and expands biodiversity and provides access to healthy outdoor spaces. I see the Sweetwater River and Reservoir reducing our dependence on water from the Colorado River by improving the underground aquifer that underlies this part of the County.

Opportunities for meeting CAP Goals

On the matter of Climate Co-Benefits and Community priorities, (page 43, 4.2 of Draft CAP Oct 2023) under Equity, improving community health by reducing noise and increasing trees is a direct benefit from not sand mining but from planting trees on parts of the property or just allowing trees to grow from the natural environment. There are also potential opportunities for expansion of green workforce training in both managing the new tree growth, as well as the project to restore other parts of the property to its natural state-identifying and removing non-native plants, growing native plants in a nursery type setting, possibly working with the Cuyamaca College Horticulture Department.

I believe there is a lot that can be done with this property that can be a positive contributor to the County of San Diego's Climate Action Plan, planting carbon absorbing tree's, reducing greenhouse gases, producing a cleaner watershed and reducing dependence on Colorado River imports, building a better environment for the communities in this part of unincorporated County of San Diego land, and strengthening the bonds between the people of Jamul and Rancho San Diego, Cuyamaca College, The Water Conservation Garden, the Jamul and Sycuan Bands, the McGrath YMCA, and many more stakeholders all up and down the Sweetwater River watershed.

Let me add that I recognize that this visionary proposal (!) would entail some sort of financial action by the County, perhaps along with Partners private and public, for example such as: U.S. Fish and Wildlife Service, California State Parks Association, Sycuan Band and the Jamul Indian Village of the Kumeyaay Nation, Cuyamaca Community College, McGrath YMCA, Moon Valley Nurseries, the Living Coast Discovery Center, Target Stores etc.

I also note that the County is still in need of affordable housing, a recent story about Del Mar building affordable housing on the Racetrack grounds made me think of it, perhaps that part of the property just east of Steel Canyon Road and North of Jamul Drive which already has some shuttered buildings there (I think it was some sort of halfway house or rehab center) that could have some housing built there using, for example, HHSA HCD funds or Grants from the State and Federal government, might contribute some units to that problem resolution and provide added fiscal benefits to the County in general.

Let me thank you for any attention you give to this letter, I just think that this property can be put to so much better use, for the benefit of so many more people, for the entire region, than this terribly short sighted and destructive proposal by the owner of the Cottonwood Golf Course. I see a GEM in the East County, not an ugly open sore in the Sweetwater River valley.

Thank you again,

Gregg Rosner
Sr. Accountant
San Diego County Treasurer-Tax Collector's Office
1600 Pacific Highway Room 151
San Diego, CA 92101
[619-531-5609](tel:619-531-5609)

From: [Gaines, Georgina](#) on behalf of [LUEG, PDS.PlanningCommission](#)
To: [Jacobs, Christopher](#)
Cc: [Hofreiter, Daniella T](#)
Subject: FW: [External] Cottonwood Salt mines
Date: Thursday, April 17, 2025 11:01:18 AM

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

From: Jenae Sanders <jenaeners@icloud.com>
Sent: Thursday, April 17, 2025 10:18 AM
To: LUEG, PDS.PlanningCommission <PDS.PlanningCommission@sdcounty.ca.gov>
Subject: [External] Cottonwood Salt mines

Dear Planning Commission,

I am a resident of unincorporated El Cajon, and would be negatively impacted by the proposed plan to mine salt from the Cottonwood gold course area. The health, traffic, and environmental impact would be devastating to our community. I strongly urge you to NOT support this project moving forward.

Respectfully-
Jenae Sanders

From: [TravisNJessica Clark](#)
To: [Jacobs, Christopher](#)
Subject: [External] Rancho San Diego Project Inquiry
Date: Wednesday, November 20, 2024 9:56:40 AM

Morning Christopher,

I'm reaching out to get an update on the Sand Mill project proposal in Rancho San Diego. Im curious if you know about the certainly of this project; or if owners could be open to other businesses opportunities.

I'm a veteran spouse, small business owner looking for some mature landscape property in East County to open up a unique private community space.

If you are able to shine a light on this as a possible opportunity if the project is not going through, I would greatly appreciate it.

Thank you for your time

Jessica Clark

From: Lori Pierce <cultleaderbravo@gmail.com>
Sent: Friday, May 9, 2025 8:25 PM
To: LUEG, GroundWater, PDS <PDS.LUEGGroundWater@sdcounty.ca.gov>
Subject: [External] cottonwood sand mine

I am inquiring if you are aware of the proposed cotton sandmine project located on willow glen rd in el cajon. i understand from the state that your agency is to be contacted regarding this project is in accordance with local laws and regulations.

According to Brian Moniz with the State SGMA

"the area that you are referencing fall within the El Cajon Valley Groundwater Basin, which is ranked as a Low Priority Basin for the Sustainable Groundwater Management Act (SGMA). This is not to say that the issues within this basin are considered low priority. The Low Priority ranking means that the basin is not subject to the mandatory requirements of SGMA and is therefore not obligated to form a Groundwater Sustainability Agency (GSA) and develop a Groundwater Sustainability Plan (GSP). One of the founding principles of SGMA is that groundwater is best managed at the local level. That said we would divert to the local jurisdictions to step in make sure that the project you are referencing is in accordance with all local laws and regulations.'

He gave me your contact info, so i guess I am asking, if you have, or will look into this project, because I cannot even believe that this is actually an issue as they would be disrupting our aquafer. How is this even being considered?

Thank you for your time and hopefully we can deem this ecological disaster null and void.
lori pierce

From: [Phillip Faker](#)
To: [Jacobs, Christopher](#)
Subject: [External] Cottonwood Sand Mine
Date: Monday, March 25, 2024 2:10:26 PM

March 25, 2024

Planning & Development Services

Attention: Christopher Jacobs

5510 Overland Avenue, Suite 310

San Diego, CA 92123

Re: Cottonwood Sand Mine

Sent by email to: Christopher.Jacobs@sdcounty.ca.gov

Dear Mr. Jacobs,

As the proposal for the Cottonwood sand mine progresses to the planning commission, it is crucial to explore promising alternatives that align with our county's commitment to environmental stewardship while meeting the demand for fine sand aggregate essential for construction concrete. The promising alternative is "manufactured sand."

Globally, there is a growing trend towards banning sand mining from environmentally sensitive areas, notably riverbeds and streams. In some locations, the construction industry has pivoted towards manufactured sand as a sustainable solution. California's own BoDean Company in Santa Rosa has successfully embraced this approach as have other California rock crushing operators. Utilizing innovative machinery from companies such as REMCO Inc., these operators produce fine sand aggregate that meets the American Standards for Testing and Materials (ASTM) standards for construction concrete.

The recent "San Diego County Construction Aggregate Market Study" underscores the urgency of addressing our sand needs sustainably. The study projects a 2,400,000-ton deficit in 2024 and a 3,000,000-ton deficit in 2030. Currently, sand deficits are met through imports from Mexico and locations north of San Diego County, incurring significant transportation costs. The proposed Cottonwood sand mine's output of 570,000 tons annually falls well short of meeting current and future deficits. However, San Diego's existing rock crushing quarries, with the incorporation of manufactured sand production, could adequately and more economically, meet the county's demand for construction sand aggregate. Moreover, they can achieve this by utilizing quarry dust and other quarry waste materials.

Encouraging San Diego's existing quarries to adopt manufactured sand processes is crucial. While initial equipment costs and a lack of awareness among quarry operators about the benefits of manufactured sand may pose initial obstacles, the long-term advantages are undeniable. The county should strive to educate operators about the

extensive civil engineering research supporting the superiority of manufactured sand over natural sand. Additionally, offering financial incentives such as low-interest loans, tax credits, or cash subsidies could incentivize operators to incorporate manufactured sand into their product lines.

It is evident that the decision facing the commission extends beyond the approval of the Cottonwood sand mine. Rather, it is about embracing sustainable practices that safeguard our environment while fulfilling our construction needs. Manufactured sand presents a viable solution to this challenge.

I have accumulated an abundance of research material on this topic and can share it with you or any county planner who would be interested.

I would very much like to discuss this matter further and would appreciate the opportunity for a brief telephone conversation.

Sincerely,

Phillip J. Faker

619-987-9288 (Cell)

From: [Phillip Faker](#)
To: [Jacobs, Christopher](#)
Subject: [External] Cottonwood Sand Mine
Date: Thursday, September 26, 2024 11:36:42 AM
Attachments: [Phil's Research Summary 5 Condensed Revision 1.pdf](#)

Dear Christopher,

I have recently completed extensive research on the feasibility of using manufactured sand as an alternative to mining sand from riverbeds and streams. I have attached a PDF document containing my findings, which I believe could be of interest to you and your team.

The environmental impact of sand mining has become a critical concern, particularly in regions like ours where rivers and streams play a vital role in our ecosystem. Manufactured sand—produced by crushing rocks and aggregates—offers a sustainable alternative that minimizes the ecological disruption caused by traditional sand extraction methods.

I have also shared a copy of this research with the East County Magazine, and they may consider publishing it or a condensed version. However, I wanted to reach out to you directly to discuss the matter further. If you have the time, I would greatly appreciate the opportunity to have a brief telephone conversation with you. Your insights and expertise would be invaluable as we explore ways to promote environmentally responsible practices in construction and infrastructure development.

Thank you for your attention, and I look forward to connecting with you soon.

Sincerely,

Phil

619-987-9288

CAN MANUFACTURED SAND SAVE SAN DIEGO'S RIVERBEDS AND STREAMS?

Phillip J. Faker
09/09/2024

BACKGROUND

Portland Cement Concrete (PCC) is vital to the construction industry and the wider community. It is widely used in infrastructure projects, commercial and residential construction, renovations, and landscape projects. PCC is used for its unique qualities of strength, durability, and low cost.

PCC consists of a Portland cement paste mixed with water and aggregates (gravel, crushed stone, and **SAND**). There are two types of sand aggregate: 1) **Alluvial or natural sand**, mined from riverbeds and streams, and 2) **Manufactured sand (M-Sand)** made from crushing larger rocks.

THE PROBLEM

The **March 2022 San Diego Construction Aggregate Market Study**¹ projected that, due to the lack of sand aggregate production in San Diego County, over two million tons of sand will need to be imported in 2024, increasing to three million tons by 2035. Transporting the sand increases the price of sand which results in a higher price for PCC which increases construction costs.

THE ALTERNATIVES

The challenge is to produce enough sand in San Diego County to meet demand. There are two alternatives:

- 1) Mining natural sand from specific riverbeds and streams, which is the objective of the Cottonwood Sand Mine (CWS) proposal, currently in the planning stage, or
- 2) Encouraging existing rock quarry operators to install the necessary equipment to add M-Sand to their aggregate product lines.

The Natural Sand vs M-Sand

In a 02/06/2023 article for Quarry Magazine, editor William Arnott wrote: "M-Sand is the economical and environmentally friendly substitute for the natural kind. Natural sand **is** a finite resource and we're running out of it. The situation is so grave, the United Nations warned us of a global sand crisis in 2022." Arnott states, "There is a growing concern about the impact on biodiversity of our waterways and the risk to populations living close to them, and this is making it harder and more expensive to get permits for future sand mining operations."²

But, people ask, why can't desert sand or coastal beach sand be used in making PCC? Arnott responds, "Desert sand is worn completely round by the wind and is effectively useless for

¹ Prepared for the Sweetwater Authority by Crystal Waters Consulting, LLC, 2214 Faraday Avenue, Carlsbad, CA 92008.

² "Is Manufactured Sand the Future of Concrete?", *Quarry Magazine* -Environmental News Material Handling, Plant & Equipment; 02/06/2023; <https://www.quarrymagazine.com/2023/06/02/is-manufactured-sand-the-future-of-concrete/> William Arnott is an experienced editor for Quarry, a publication that covers the mining and quarrying industry. With a focus on providing informative and engaging content, William's articles explore topics such as safety measures, equipment optimization, industry events, and notable partnerships within the sector.

construction concrete.” He notes that coastal sand mining has already been banned in many locations. (California has banned the mining of coastal sand.)³ Arnott concludes: “Luckily, there is a solution. M-Sand is more sustainable, environmentally friendly, and economical than traditional sand mining. Manufactured sand is the way forward.”

With the development and technological advances of sand manufacturing equipment, M-Sand, when made properly, is now considered suitable for PCC. California’s **Standard Specifications for Public Works Construction**⁴ popularly known as the “**Greenbook**,” lists M-Sand, as authorized sand aggregate for PCC.⁵ The City of San Diego, San Diego County, SDG&E and CalTrans have adopted the Greenbook specifications for sand aggregate. In many PCC design mixes, M-Sand can be used without the need to blend it with natural sand.

The Cottonwood Sand Mine (CSM)

CSM proposal involves a 10-year plan to mine 570,000 tons of sand aggregate annually from the Sweetwater River channel flowing through the Cottonwood golf course in East County. The CSM developer offers the argument that the delivered price of CWS sand will be less because transportation costs will be less than the natural sand currently being imported. This may be true, but it is equally true for M-Sand that can be produced by existing rock quarries located within San Diego County. Transportation costs in either case is not eliminated, but rather, reduced.

Another argument for the CWS is that, when compared to imported sand, CWS sand production will result in fewer vehicle miles traveled (VMT) by the heavy trucks that haul the sand, thereby reducing emission of greenhouse gases, air pollution, traffic congestion and road maintenance. Again, one can make the same argument for M-Sand.

TWO IMPORTANT QUESTIONS

- 1) **Can M-Sand compete in the San Diego aggregate marketplace?** The national sales director for a company that makes equipment needed to manufacture sand, thinks so. He claims that for an approximate \$1,000,000 investment in his company’s vertical shaft impact crusher and related equipment, rock quarry operators can make a reasonable profit and pay back the cost of the equipment in a brief period of time.⁶ Moreover, M-Sand can be made using quarry dust and waste material from the rock crushing operation.
- 2) **How many vertical shaft impact crushers would it take to produce 570,000 tons of sand aggregate annually, which is the amount that the CWS will produce annually?** Each crusher can produce between 200-250 tons per hour. Operating the crusher 60 hours weekly for 50 weeks, one VSI crusher would produce 600,000 tons annually. Four VSI crushers could produce

³ [State Lands Commission approves closure of last coastal sand mine in the continental U.S. | CA State Lands Commission](#)

⁴ The Greenbook is produced by a committee of public works officials and industry representatives.

⁵ The Greenbook specifications for sand aggregate are found in Sections 200-1.5, 200-1.53 and 200-1.5.5 which list M-Sand as a suitable sand aggregate for PCC. The City of San Diego, San Diego County, SDG&E and CalTrans have adopted the Greenbook specifications. Section 90-1.02C(3) of the 2023 CalTrans Standard Specifications Book authorizes the use of M-Sand in PCC.

⁶ He estimates the price for the undelivered M-Sand would be between \$22-\$28/ton. This is comparable to the current undelivered price for sand mined by Western Materials in Riverside County and the East County Sand Mine.

all of San Diego's sand aggregate needs projected in the March 2022 Construction Aggregate Market Study (cited above).

MOST IMPORTANTLY

Encouraging existing rock quarry operators to add M-Sand to their product line is vastly superior to placing a sand mining operation in a location surrounded by planned residential communities. The negative ecological impact and the negative impact on health, traffic, aesthetics, and real estate values in those communities over ten plus years of mining activity will be considerable and unnecessary.

WHAT CAN BE DONE

1. Formation of a Joint Task Force:

- The County Planning Department and SANDAG (San Diego Association of Governments) could collaborate to establish a joint task force. This task force would bring together key stakeholders, including:
 - **Industry Leaders:** Representatives from the San Diego concrete and rock quarry industry and M-Sand equipment manufacturers.
 - **Planners:** Experts from San Diego County's planning districts.
 - **Civil Engineers:** Professionals specializing in concrete and aggregate materials.
 - **Environmental Advocates:** Individuals with expertise in sustainable practices.
- The goal of the task force would be to develop a comprehensive, long-term plan to address the growing demand for concrete and concrete aggregate within the county.

2. Global Best Practices Research:

- The task force should actively investigate what other districts worldwide are doing to mitigate the environmental impact of sand mining. Many places have taken steps to address this issue.⁷
- **Banning Riverbed and Coastal Sand Mining:** Several regions have prohibited sand mining from riverbeds, streams, coastal beaches, and the ocean floor due to ecological concerns. San Diego County could learn from these examples.
- **Alternative Sources:** Many areas have already successfully shifted toward alternative sources of aggregate. For example, Kayasand Limited, a New Zealand supplier of sand engineering equipment and technology developed by Kemco (Kotobuki Engineering and Manufacturing Co, Ltd of Japan) has opened New Zealand's first sand engineering plant. Bram Smith (CEO) says "the **engineered sand** produced is of high-quality and broadly meets the Japanese equivalent of ASTM C33 specifications.⁸ It outperforms both manufactured and natural sand in concrete. It's of such good quality there's no need to blend it with natural sand. Additionally, it produces stronger concrete than natural sand with at least 10% less cement. Workability, pumpability, and finish of the concrete remain unaffected. The reduction of at least 10% of cement in concrete translates to a potential carbon emissions reduction of 6,000 tons per year. And the sand is made without the need for water and settling ponds.

⁷ India, Japan, New Zealand, Australia....

⁸ ASTM (American Society for Testing and Materials). ASTM C33. This specification defines the requirements for grading and quality of fine and coarse aggregate for use in concrete. Fine aggregate shall consist of natural sand, manufactured sand, or a combination thereof. Fine aggregate shall be free of injurious amounts of organic impurities.

3. Encouraging M-Sand:

- One specific recommendation is to incentivize or encourage rock quarry operators to incorporate M-Sand into their product lines. Here is why:
 - **Technical Feasibility:** Quarries can produce M-Sand alongside their rock crushing operations.
 - **Reducing Environmental Impact:** By promoting M-Sand, pressure on riverbeds is reduced which preserves sensitive ecosystems.
- **Permit Considerations:** The task force could explore linking permit renewals or new permits for quarries to their adoption of M-Sand. This would encourage industry players to diversify their offerings.
- **Consider Financial Incentives:** Offering quarry operators tax credits, low interest loans or cash subsidies to purchase equipment needed to manufacture sand might be considered.

4. Public Awareness and Education:

- Engage the public, construction professionals, and developers in discussions about sustainable practices. Highlight the importance of responsible aggregate sourcing.
- Promote awareness campaigns about the benefits of M-Sand and the need to protect natural sand resources.

Our collective efforts toward environmentally responsible construction practices can make a significant impact. Let us build a more sustainable future for San Diego County.

From: ht64ss <ht64ss@gmail.com>

Sent: Tuesday, September 3, 2024 7:30 PM

To: CodeCompliance, PDS <PDS.CodeCompliance@sdcounty.ca.gov>

Subject: [External] Cotton Wood Sand Mine Environmental Impact Report (EIR)

A question(s) for the CottonWood Sand Mine Environmental Impact Report (EIR).

Does the Environmental Impact Report (EIR) discuss the impact of how the removal of all the soil, sand and other

debris from the "sand mine" will have on the structure of the hillside that separates west of Willow Glen and east of wind river road.

Just like every oceanfront cliff or other landslide area of California, digging 50 feet into the ground will cause that whole hillside

to fall/slide causing damage to all of the homes along that ridge. Please look at this from the overlook just north of 2506 Wind River Rd and then from

willow glen as you look up at those homes. You would need to build structural protection to prevent this. We see it with our Surfliner train that travels up to LA.

Has great thought been looked at on the effects this will have on the sweetwater water supply and to those communities that rely on that water. The water travels from the mountains, through that golf course and then to the sweetwater reservoir.

I understand you are just now in review of the latest version.

Thank you,
Robert Jacques

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

From: Steve Purkey <stevepurkey@yahoo.com>

Sent: Wednesday, February 5, 2025 6:17 PM

To: Jimenez, Ann <Ann.Jimenez@sdcounty.ca.gov>

Subject: [External] Cotton wood

Steve Purkey this should never happen. Just another example of the rich paying off the right people. No one would want to live near it.

From: [Bill Elias](#)
To: [LUEG, PDS.PlanningCommission](#); [Jacobs, Christopher](#)
Subject: [External] Denial of the Cottonwood Sand Mine Project
Date: Sunday, August 17, 2025 5:29:03 PM

Dear Planning Commission Members,

I hope this message finds you well. I am writing to formally state my opposition to the proposed Cottonwood Sand Mine Project at 3121 Willow Glen Drive, El Cajon, CA. I respectfully request that the Planning Commission deny the Major Use Permit and Reclamation Plan for this project.

Sincerely,
Nabil Elias
1535 Woodpine Dr,
El Cajon, CA 92019



Deborah Haynes
1578 Greencrest Ct
El Cajon, CA 92019-4108

ATTACHMENT D

County of San Diego Planning and
Development Commission

5510 Overland Ave Ste 310

San Diego CA 92123-123885

RE: Coronado Sand
Mine Project
ADS 2018-MUP-18-023; ADS 2018-RP-18-001; ADS 2018-ER-18-19-001

SACRAMENTO CA 957

6 JUN 2025 PM 6 L



D-131

June 4, 2025

County of San Diego Planning & Development Services

5510 Overland Ave. Ste.310

San Diego, CA 92123

RE: Public Hearing PDS2018-MUP-18-023;PDS2018-RP-18-001; PDS2018-ER-18-19-007

County of San Diego Planning Commission,

Having been a resident of San Diego's East County since 1952, I am deeply concerned and very much against the Cottonwood Sand Mine Project.

I live within walking distance of the proposed mine, but no longer wish to subject myself to the dangers of the truck traffic, the health problems associated with silica, and the deafening noise. No longer are the trails safe and available to wildlife and me.

Just a few weeks ago as I sat outside waiting for my order from a Mexican restaurant on the southwest corner of Jamacha Rd. and Chase Ave., I counted eight dump trucks passing the restaurant in less than ten minutes. That would be 48 trucks per hour and 480 trucks per day between 7:00a.m and 5:00p.m. The statistics will be staggering if calculated for the proposed 10-year plan. Additionally, there will be increased traffic accidents and even more damage to the roadways.

I am one of many neighbors and homeowners who have opposed this project since its onset. Please listen to the people who you serve.

Sincerely,

A handwritten signature in cursive script, appearing to read "Deborah A. Haynes".

Deborah A. Haynes

1578 Greencrest Court

El Cajon, CA 92019

From: noreply@granicusideas.com
To: [LUEG, PDS.PlanningCommission](#); [Smith, Ashley J](#); [Slovick, Mark](#); [Oberbauer, Sean](#); [Johnson, Michael D.](#)
Subject: [External] New eComment for Planning Commission Hearing
Date: Thursday, June 5, 2025 1:30:26 PM



New eComment for Planning Commission Hearing

Ellen Catt submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. Cottonwood Sand Mine Project; PDS2018-MUP-18-023, PDS2018-RP-18-001, PDS2018-ER-18-19-007; Proposed conformance with California Environmental Quality Act (CEQA) – Environmental Impact Report (if approved), Not subject to CEQA pursuant to CEQA Section 21080(b)(5) (if disapproved); Valle De Oro Community Plan Area (C. Jacobs)

eComment: Hello, Our home and yard share a property line with the Cottonwood Golf Course and the proposed sand mine. We would have direct negative impact on a daily basis with noise, dust, traffic, destroyed views, decreased quality of life and decreased property value. The impact on us would be devastating but this is also obviously the wrong project for our entire neighborhood and community. From a human and animal health, community desirability and from an environmental perspective this creates negative impacts on roads, schools, businesses, assisted living communities. Do not destroy our neighborhood for 12 years so one company can make money. Please vote no on this project. Thank you. .

[View and Analyze eComments](#)

This email was sent from <https://sdcounty.granicusideas.com>.
1600 Pacific Highway San Diego, CA 92101

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From: [Gaines, Georgina](#) on behalf of [LUEG, PDS.PlanningCommission](#)
To: [Jacobs, Christopher](#)
Subject: FW: [External] Re: 6/13/25 Cottonwood Sand Mine Project Hearing
Date: Monday, June 2, 2025 8:19:36 AM

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

From: ian ogilvy <iancogilvy@gmail.com>
Sent: Sunday, June 1, 2025 5:05 PM
To: LUEG, PDS.PlanningCommission <PDS.PlanningCommission@sdcounty.ca.gov>
Subject: [External] Re: 6/13/25 Cottonwood Sand Mine Project Hearing

I am out of town for the hearing but I'm am totally against the project.

One of my main concerns is the extra traffic impact. I use Willow Glen daily and it's already littered with trucks from the current mine. They sit at various road intersections, early in the morning, waiting for their allotted time. They then travel to the mine and often drop debris damaging vehicles. The road is already in poor condition and is heavily travelled with casino and residential traffic.

How can a sand mine in the middle of a residential area be a good idea?

Sincerely

Ian C Ogilvy

From: noreply@granicusideas.com
To: [LUEG, PDS.PlanningCommission](#); [Smith, Ashley J](#); [Slovick, Mark](#); [Oberbauer, Sean](#); [Johnson, Michael D.](#)
Subject: [External] New eComment for Planning Commission Hearing
Date: Monday, June 9, 2025 2:06:29 PM



New eComment for Planning Commission Hearing

James Meyer submitted a new eComment.

Meeting: Planning Commission Hearing

Item: www.sandiegocounty.gov/pds/PCHearing. Large groups wishing to comment on a common item are encouraged to submit e-comments or to identify one spokesperson to join the teleconference on behalf of the group. If you have any questions, please contact the Planning Commission Secretary at PDS.PlanningCommission@sdcounty.ca.gov

eComment: RE: Cottonwood Sand Mine Project Having lived in the area for nearly 46 years, I have witnessed the extreme growth of the area. From the 2-lane road that was Jamacha Road into the 4-lane Hwy 54 it is today. From the horse ranch along Jamacha Road with its palm tree lined driveway to what is now Rancho San Diego Shopping Center (Ralphs, Rite Aid, Petco). And the too many housing developments to list that surround this property. The one thing that has NOT changed in all that time is the location of the two rock quarries in the area (one on Jamacha Road and the other on Willow Glen Drive, both within approximately 1.50 miles of the purposed Cottonwood Sand Mine. All the development in the area has occurred with these two properties impacting the area because they were there first. SENIOR RIGHTS. The granting of any permits for this project would impact the quality of life for thousands of families in too many ways to list. We look for the Denial of this project. We have SENIOR RIGHTS!

[View and Analyze eComments](#)

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1600 Pacific Highway San Diego, CA 92101

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From: [Gaines, Georgina](#) on behalf of [LUEG, PDS.PlanningCommission](#)
To: [Jacobs, Christopher](#)
Cc: [Smith, Ashley J](#); [Slovick, Mark](#)
Subject: FW: [External] Cottonwood = Climate Action + Local Jobs
Date: Wednesday, June 11, 2025 10:49:39 AM

From: Jesse Garcia <civicinput@newmode.io>
Sent: Wednesday, June 11, 2025 8:54 AM
To: LUEG, PDS.PlanningCommission <PDS.PlanningCommission@sdcounty.ca.gov>
Subject: [External] Cottonwood = Climate Action + Local Jobs

Dear Planning Commissioners,

Please approve the Cottonwood Proposal — a much-needed step to help our region’s housing, infrastructure, and environmental goals.

I support this project because having a local sand supply at Cottonwood:

Reduces emissions by cutting long-haul trucking from out-of-county and international sources.

Lowers skyrocketing costs to build and maintain critical infrastructure and housing.

Creates local jobs and boosts our regional economy.

Ensures the defunct golf course becomes restored open space for future generations.

This project is a smart investment in San Diego’s future, combining fiscal responsibility, sustainability, and public benefit. I respectfully urge you to support it.

Sincerely,

Jesse Garcia
[Jgarcia@wscarpenters.org](mailto:jgarcia@wscarpenters.org), 8595 Miralani Drive, San Diego, CA, US, 92126

From: noreply@granicusideas.com
To: [LUEG, PDS.PlanningCommission](#); [Smith, Ashley J](#); [Slovick, Mark](#); [Oberbauer, Sean](#); [Johnson, Michael D.](#)
Subject: [External] New eComment for Planning Commission Hearing
Date: Monday, June 9, 2025 3:22:15 PM



New eComment for Planning Commission Hearing

Lynne Malinowski submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. Cottonwood Sand Mine Project; PDS2018-MUP-18-023, PDS2018-RP-18-001, PDS2018-ER-18-19-007; Proposed conformance with California Environmental Quality Act (CEQA) – Environmental Impact Report (if approved), Not subject to CEQA pursuant to CEQA Section 21080(b)(5) (if disapproved); Valle De Oro Community Plan Area (C. Jacobs)

eComment: I oppose putting an industrial operation of this magnitude in the middle of a residential area with so many negative impacts: it may bring very serious health risks to the residents during the planned operation and afterwards, impact traffic with the continuous stream of tractor trailers and road degradation from those heavy vehicles, congestion of an already heavily trafficked area of commuter roads and highways, additionally affecting many surrounding communities, and degradation of the quality of life for all those living in the area. This project would devastate the area.

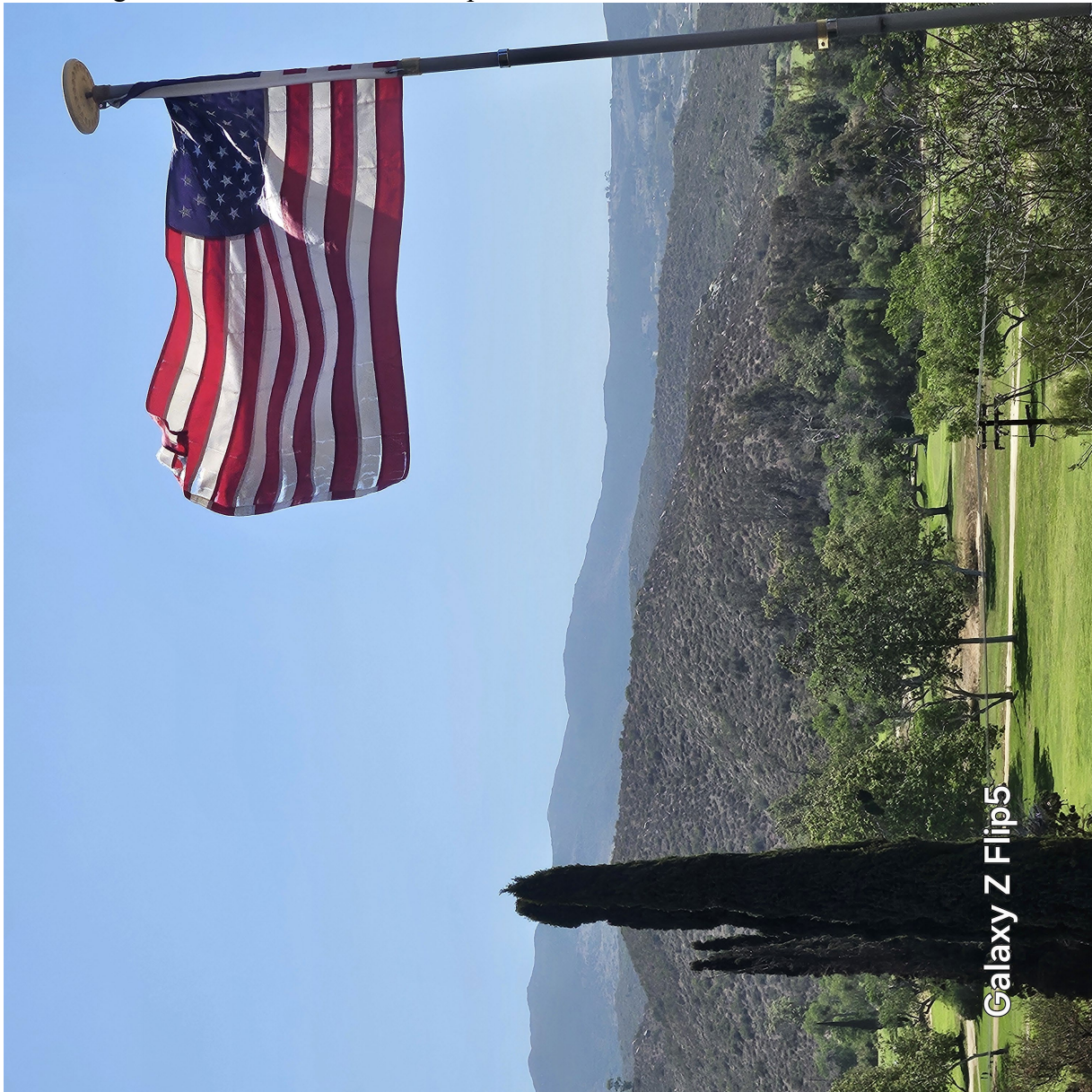
[View and Analyze eComments](#)

This email was sent from <https://sdcounty.granicusideas.com>.
1600 Pacific Highway San Diego, CA 92101

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From: [Paul R.S.](#)
To: [Jacobs, Christopher](#)
Subject: [External] Re: Notice of Public Hearing for the Cottonwood Sand Mine Project
Date: Friday, June 27, 2025 1:57:11 PM
Attachments: [image001.png](#)
[image001.png](#)

Can't imagine turn it from this to a sand pit.



prs

On Fri, Jun 27, 2025, 10:25 AM Jacobs, Christopher <Christopher.Jacobs@sdcounty.ca.gov> wrote:

Greetings,

Attached please find the Notice of Public Hearing for the Cottonwood Sand Mine Project. The Planning Commission hearing is on 7-9-25 at the location identified in the notice. Please note that the Planning & Development Services Department is recommending denial of the Project. The recommendation of denial is due to the difficulty in making all the Major Use Permit (MUP) findings that are required in Zoning Ordinance section 7358, particularly that the Project will not have a harmful impact on the desired community character and that the site is suitable for a mine. The Final Environmental Impact Report (EFIR) is posted on the County web site at <https://www.sandiegocounty.gov/pds/ceqa/MUP-18-023.html>. The Planning Commission may choose to certify the FEIR should the Commission disagree with the staff recommendation and approve the Project (MUP + Reclamation Plan).

Sincerely,

Chris Jacobs *(he/him/his)*

Land Use/Environmental Planner III – Project Planning

County of San Diego - Planning & Development Services (PDS)

[5510 Overland Avenue](#), Second Floor

San Diego, CA 92123

Phone: 619-323-8718



From: noreply@granicusideas.com
To: [LUEG, PDS.PlanningCommission](#); [Smith, Ashley J](#); [Slovick, Mark](#); [Oberbauer, Sean](#); [Johnson, Michael D.](#)
Subject: [External] New eComment for Planning Commission Hearing
Date: Thursday, June 5, 2025 12:25:44 PM



New eComment for Planning Commission Hearing

Rebecca Neary submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 3. Cottonwood Sand Mine Project; PDS2018-MUP-18-023, PDS2018-RP-18-001, PDS2018-ER-18-19-007; Proposed conformance with California Environmental Quality Act (CEQA) – Environmental Impact Report (if approved), Not subject to CEQA pursuant to CEQA Section 21080(b)(5) (if disapproved); Valle De Oro Community Plan Area (C. Jacobs)

eComment: I am virtual pink slip opposed due to Sweetwater River Pollution, and excessively large vehicles using Willow Riad, very close to an elementary school and Rancho San Diego Town Center which has pedestrian shopper traffic, persons boarding transit buses and some density due to apartments. Not a good match for such an industrial use, plopped into a residential area

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Date: 1 June, 2025
From: Ronald Bentley rkbentlet1@cox.net
3051 Cottonwood View Drive, El Cajon, CA 92019
To: Robert Hingtgen, Environmental Coordinator
San Diego County Planning and Development Services
Subject: **Major Use Permit 18-023: The Cottonwood Sand Mining Project**

Dear Christopher Jacobs,

The view from my patio and back room is the second fairway of the Cottonwood Ivanhoe golf course. I am retired and bought this house twenty years ago because of the location. During the time I have lived here, the golf course has mined sand from several locations, but caused little disturbance to those of us that live in this area. The previous owner's last mining project on the Northeast side of the course (**picture below**) was to be a large lake. The trucks taking material out of that area exited the property on that end of the course onto Willow Glen. The total area of this excavation was less than one percent of the area of the proposed project east of Steele Canyon Rd.

The current owner filled in that hole. Because they no longer had access to the northeast, the trucks bringing fill material for that, entered the course from Ivanhoe Ranch Road through a service gate. That service road runs thirty-five feet from my patio door. Constant large truck traffic, five days a week, eight hours a day for many weeks, created high levels of noise and dust. We like to leave the door open to enjoy the fresh air. During this period leaving the door open was not an option. I did not complain, because I was trying to be a good neighbor. I was hoping the golf course would be successful and remain. Little did I know at that time what the new owner had in store for us. This mining project will be much worse, last much longer, negatively impact the environment, the character our community, and significantly lower property values, which I was depending on later in my retirement.

I have asthma and heart issues. The resulting pollution from diesel exhaust and dust will be detrimental to my health and make it such that I will have to remain indoors with my house totally closed up during most of the week. I am sure, I am not the only senior living in this area with similar problems and we should not have to suffer or leave the area. This project will negatively impact, not just me but many families in this area, not just those of us that live directly on the golf course.



I write to voice my strong objection to the proposed Cottonwood Sand Mine in Rancho San Diego. It makes no sense that a major, long-term mining operation within yards of hundreds of adult and child residents, an elementary school and already overcrowded and narrow roadways is even considered. If approved, the mine will be operating for at least 12 years and possibly longer. During that time an estimated 5.7 million tons of sand and rock will be excavated, processed, loaded onto large, heavy trucks and exported to whatever site is willing to pay the most. And although the owner states that he wants to reduce dependence on imported sand in the County, there is no guarantee, nor requirement, that the product from this mining will stay in San Diego County.

The proposed open pit excavations to 35 feet or more will have a demonstrably adverse impact on the environment and community. The proposed heavy equipment and nearly 2000 feet of conveyor belts will create an incredibly noisy and nerve-racking environment. This is generally a rural community of large-lot houses with families, children, animals and even horses. It is located adjacent to a National Wildlife Refuge. The resulting noise disruption to the entire area will be felt immensely, along with the dust, smoke, dirt, particulate matter and diesel fumes that will eventually permeate the community. It is unthinkable that these operations are planned to begin at 7:00 AM, with loading and truck transport to begin even earlier at 4:00 AM. The animals and vegetation that now inhabit the open space surrounding the proposed mine site will similarly suffer. Some species are endangered, and the habitat destruction will have far-reaching and long-term impacts.

I am greatly concerned about the potential groundwater impact. While direct pollution from the operation of the mining equipment is possible, disruption of existing flow patterns is immediate and unavoidable. Many nearby residents have wells and depend upon the groundwater to be available and potable. Where in the Major Use Permit application are the plans to mitigate any of these significant impacts? And where is the concern or mitigation for any of the lost property value that this community will unequivocally suffer?

ATTACHMENT D

The property owner points to the proposed reclamation efforts as somehow offsetting the deleterious consequences of this open-pit mine. But much of what will be done under the guise of "reclamation" would be necessary in any event to support the planned development of the property, which, after all, is the endgame for this property owner. I am sure from the owner's perspective this is good business, that is, to get paid for what you would otherwise have to pay for yourself. But I would hope that from the County Planning and Development Services' perspective this will be seen for what it is, exceedingly poor stewardship of the environment and the physical well-being and safety of the community. I urge you not recommend approval of this Major Use Permit.

When you make your decision, I hope you will consider the negative impact on the environment, the character of this area and the number of residents that will suffer substantial decrease in the financial value of their homes.

Sincerely,

A handwritten signature in cursive script that reads "Ronald Keith Bentley".

Ronald Keith Bentley
3051 Cottonwood View Drive
El Cajon, CA 92019

From: [Gaines, Georgina](#) on behalf of [LUEG, PDS.PlanningCommission](#)
To: [Jacobs, Christopher](#)
Subject: FW: [External] stop cottonwood sand mine
Date: Monday, June 2, 2025 4:12:24 PM

From: Steen <tjsteen@cox.net>
Sent: Monday, June 2, 2025 4:00 PM
To: LUEG, PDS.PlanningCommission <PDS.PlanningCommission@sdcounty.ca.gov>
Subject: [External] stop cottonwood sand mine

To Ronald Ashman, Michael Edwards, Molly Weber, Yolanda Calvo, David Pallinger and Colton Sudberry,

We would like to comment on the cottonwood sand mind major use permit request.

As I'm sure you are aware, there are numerous groups and east county residents who strongly oppose this project for multiple reasons. Aesthetics, noise, traffic and air quality to name a few.

Willow Glen Drive is already a very heavily traveled road, without the addition of the trucks from the sand mine. Automobiles and trucks alike travel at unsafe speeds on this road and there have been many accidents that occur right in front of our residence. Adding the traffic from the sand mine will only make this road more dangerous, in spite of the FEIR stating that the project would not increase hazards to motorists, pedestrians, or bicyclists. Our observations come from living on the road and not from a "study" that was conducted in July 2022.

The FEIR states that the "“Amphitheater/Canyon Effect,” does not affect this project. This is not an accurate statement. We live across the street, elevated from the golf course and can often hear the conversations of the golfers. Needless to say, all sounds are amplified in our valley.

One thing that the FEIR stated accurately is that the aesthetic effects of this project are significant and unmitigable. We feel that there are many other impacts that are also significant and unmitigable. We ask you to seriously consider the impact that this sand mine will have on the community as a whole.

**Respectfully,
Todd and Jane Steen
2830 Willow Glen Dr
El Cajon, CA 92019**

From: [Gaines, Georgina](#) on behalf of [LUEG, PDS.PlanningCommission](#)
To: [Jacobs, Christopher](#)
Cc: [Smith, Ashley J](#); [Slovick, Mark](#)
Subject: FW: [External] Cottonwood = Climate Action + Local Jobs
Date: Wednesday, June 11, 2025 10:50:08 AM

From: Victor Diaz <civicinput@newmode.io>
Sent: Wednesday, June 11, 2025 8:56 AM
To: LUEG, PDS.PlanningCommission <PDS.PlanningCommission@sdcounty.ca.gov>
Subject: [External] Cottonwood = Climate Action + Local Jobs

Dear Planning Commissioners,

Please approve the Cottonwood Proposal — a much-needed step to help our region's housing, infrastructure, and environmental goals.

I support this project because having a local sand supply at Cottonwood:

Reduces emissions by cutting long-haul trucking from out-of-county and international sources.

Lowers skyrocketing costs to build and maintain critical infrastructure and housing.

Creates local jobs and boosts our regional economy.

Ensures the defunct golf course becomes restored open space for future generations.

This project is a smart investment in San Diego's future, combining fiscal responsibility, sustainability, and public benefit. I respectfully urge you to support it.

Sincerely,

Victor Diaz
vdiaz@wscarpenters.org, 458 Taft ave, El cajon, CA, US, 92020

From: [VICTOR NUNEZ](#)
To: [Jacobs, Christopher](#)
Cc: [Vito NUNEZ](#)
Subject: [External] Cottonwood Sand Mine Project
Date: Monday, June 9, 2025 10:10:07 PM

Mr. Jacobs, I will not be able to attend the June 13, 2025 meeting reference the Major Use Permit and Reclamation Plan.

My family and I have lived here for 40 years and have played and enjoyed the Cottonwood Golf Course for over 50 years before it was destroyed by the same people who do not even live in this Rancho San Diego Community and now, they want to bring further havoc in destroying and environmentally affecting our community and quality of peaceful life!

I and my family "DO NOT APPROVE" of this mining "Major Use Permit and Reclamation Plan!"

Sincerely,

Victor & Helen Nunez
2541 Royal Saint James Drive
El Cajon, CA 92019



396 HAYES STREET, SAN FRANCISCO, CA 94102
T: (415) 552-7272 F: (415) 552-5816
www.smwlaw.com

CATHERINE C. ENGBERG
Attorney
Engberg@smwlaw.com

June 11, 2025

Via E-Mail

Mr. Christopher Jacobs
Land Use/Environmental Planner
Planning & Development Services
San Diego County
5510 Overland Avenue, Suite 310
San Diego, CA 92123
E-Mail: christopher.jacobs@sdcounty.ca.gov

Re: Cottonwood Sand Mining Project (PDS2018-MUP-18-023),
(PDS2018-RP-18-001); Log No. PDS2018-ER-18-19-007; SCH#
2019100513

Dear Mr. Jacobs:

This firm represents the Sierra Club San Diego Chapter (“Sierra Club”), in connection with the proposed Cottonwood Sand Mining Project (“Project”). We submit this letter to protest the approval of this Project, specifically to (a) express our agreement and support for staff’s conclusion that the County’s Major Use Permit Findings for the Project cannot be met¹ and (b) to state our position that the final environmental impact report (“FEIR”)² fails to correct the inadequacies of the Draft EIR (“DEIR”) and Recirculated DEIR (“RDEIR”).

We previously submitted extensive comments on behalf of the Sierra Club regarding the deficiencies in the original DEIR and on the RDEIR. *See*, comments on the Cottonwood Sand Mining Project DEIR dated February 28, 2022; comments on the Project RDEIR dated August 19, 2023; and supplemental comments on the RDEIR dated September 1, 2023. Since those comments remain applicable to the County’s analysis of

¹ See, Staff Report for Planning Commission Hearing of June 13, 2025, at page 2.

² The DEIR, Recirculated DEIR, and the FEIR, are hereafter referred to as “EIR” unless further specified.

Christopher Jacobs
June 11, 2025
Page 2

the Project, Sierra Club expressly incorporates its earlier comments and all accompanying exhibits by reference as if fully set forth herein.

Additionally, the EIR prepared for the Project violates the California Environmental Quality Act (“CEQA”), for all the reasons set forth in our prior comments and below, and therefore does not provide the legal basis for Project approval. The County received copious comments on the DEIR and RDEIR on this project from resource agencies, community members, and technical experts enumerating the EIR’s flaws. Unfortunately, the FEIR for the Project fails to correct the EIR’s flaws and remains inadequate.³

As explained in our prior comments, the Project as proposed will have significant, adverse impacts on both the natural and the human environment in San Diego County. The Project would result in potentially devastating effects, including but not limited to: significant long-term traffic, air quality, and noise impacts to thousands of residents and schoolchildren in the immediate vicinity; substantial harm to sensitive riparian habitat and to multiple sensitive species and their habitat; substantial harm to the wildlife linkages to open space that the site provides; and the potential to threaten the safety of the drinking water supply of the surrounding community. In addition, the Project also remains inconsistent with the San Diego County Multiple Species Conservation Program (“MSCP”).

The County recirculated portions of the DEIR largely due to changes made to the project description (additional trucks to facilitate import of additional fill) and analysis of biological resource impacts. As explained further below, both the RDEIR and the FEIR fail to correct the flaws in the DEIR. To ensure that the public and County decisionmakers have adequate information to consider the proposed Project, County staff would need to prepare and recirculate a revised EIR that conducts the necessary analysis with current data and provides an accurate disclosure of the Project’s impacts, identifies feasible mitigation to address those impacts, and adequately considers a full range of alternatives.

³ The FEIR was released on May 20, 2025, allowing only limited time to review the thousands of pages long document prior to the deadline for comments for the June 13, 2025 Planning Commission meeting. Considering these time constraints, we provide these high-level comments and several examples of the document’s deficiencies. We reserve the right to supplement these comments if the Planning Commission’s decision is appealed to the Board of Supervisors.

Christopher Jacobs
 June 11, 2025
 Page 3

Sierra Club urges the County to do something far simpler: use its discretion to lawfully deny the Project. Rather than contort its CEQA review process to justify approval of this mine, the County should instead reject this project in favor of other uses that are not in fundamental tension with the existing conditions and uses on and surrounding the proposed Project site.

I. The County Cannot Make the Required Findings to Approve the Required Major Use Permit.

As explained in the Staff Report for the June 13, 2025, Planning Commission Hearing (“Staff Report”), the County is unable to make the required findings to grant a Major Use Permit (“MUP”) for the Project pursuant to Section 7358 of the County Zoning Ordinance, which states that:

“Before any use permit may be granted or modified, it shall be found:

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, 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; and to
6. Any other relevant impact of the proposed use; and

b. That the impacts, as described in paragraph "a" of this section, and the location of the proposed use will be consistent with the San Diego County General Plan.

c. That the requirements of the California Environmental Quality Act have been complied with.

Planning Department Staff correctly conclude that MUP Findings a.3 and a.5 above cannot be made because the Project would have a harmful effect on desirable

Christopher Jacobs
 June 11, 2025
 Page 4

neighborhood character and the site is not suitable for the proposed type of development. Staff Report at 2. The public comments on the EIR and associated technical reports on the DEIR and FEIR provide ample evidence to support staff's conclusion. For example, regarding section a.3 harmful effects on neighborhood character, the EIR determines that the project would result in unmitigated aesthetic impacts as well as sustained noise, vibration, and dust impacts throughout the Project's duration. DEIR at 2.1-46 to 48. Regarding the finding required under section a.5 suitability of the proposed development, the proposed Project would adversely impact scenic views and designated scenic corridors. DEIR at 2.1-22, 2.1-32, 2.1-46 to 2.1-47. Further, the FEIR concludes that the proposed Project would be inconsistent with the goals and policies of relevant plans and policies due to

“notable physical changes in the composition of the visual environment, as viewed from Willow Glen Drive, Steele Canyon Road, and surrounding recreational and residential areas, would result in reduced visual quality of the site and surrounding area and detract from the existing character of the community.”

FEIR, Topical Responses, Topical Response 11 – Consistency With Plans and Policies. Therefore, the proposed Project would not be a suitable development for the site. These shortcomings provide evidence that the Project is not compatible with area neighborhoods.

Based on the evidence in the record, the Staff Report recommends denial of the MUP and denial of the Reclamation Plan because the County is unable to make the required findings. *Id.* Sierra Club supports staff's conclusion and recommendations to deny the Major Use Permit and to deny the Reclamation Plan. In addition, as discussed further below, the County also cannot make required findings required under section a.6 (any other relevant impact of the proposed use) and sections b. (consistency with the County General Plan) and c. (compliance with CEQA).

The County cannot make finding a.6. As discussed at length in our prior comments and in this letter below, the EIR fails to accurately describe baseline conditions of biological resources on the proposed Project site. The FEIR persists in mischaracterizing substantial areas of healthy Southern Willow Scrub and Non-native grassland, both of which provide important habitat for myriad species. FEIR, Responses to RDEIR Comments, Comment R-07-13 at page 60-63 and R-07-49 at p. 101. The proposed Project would have significant unmitigated impacts on arroyo toad (a federally endangered species), which is found in the Sweetwater River watershed. Specifically, there is evidence in the record that the arroyo toad has made a resurgence in the area. *See*,

Christopher Jacobs
June 11, 2025
Page 5

SMW Supplemental Comments on the RDEIR on behalf of Sierra Club dated September 1, 2023, attached as Attachment A. The proposed Project would result in significant unmitigated impacts on this species. Therefore, the County cannot make the findings required under section a.6 due to impacts to arroyo toad and other species that inhabit the proposed Project site.

Nor can the County make finding b. As explained in our prior comments, the Project and the resulting impacts would be inconsistent with the County's General Plan and applicable Community Plan. For example, the Project is inconsistent with General Plan Policy COS.11.1 requiring protection of scenic resources and with many Valle de Oro Community Plan goals and policies regarding preservation of community character and conservation and protection of natural resources. Specifically, the proposed mining operation would excavate more than 214 acres of land along the Sweetwater River, all of which is designated in the community plan as Resource Conservation Area ("RCA"). Valle De Oro Community Plan at Appendix A Designated Resource Conservation Areas at pages 50 and 51 and Figure 7 at page 53. Denuding the area of vegetation and excavating the natural sand and soils to a depth of forty feet would not conserve the riparian area and other vegetation in the area but would instead destroy habitat for dozens of special status plants and animals. Valle De Oro Community Plan at Appendix A, RCA 77 at page 50. Restoration of these areas would take multiple decades to return to the existing conditions. Therefore, the County cannot make the finding required under section b related to the proposed Project's consistency with the General Plan.

Finally, the County cannot make finding c. Similarly, as discussed in our prior letters and throughout this letter, because the EIR remains inadequate under CEQA, the County cannot find that CEQA's requirements have been met. As demonstrated in this letter and throughout our comments on the DEIR, and RDEIR, Sierra Club and others have demonstrated that the EIR is fundamentally inadequate in several respects, including the analysis of biological resources, hydrology, and water quality. Therefore, the County cannot make the finding required under section c. As it stands, the EIR fails as an informational document and violates CEQA.

For the reasons set forth herein, we support Staff's recommendations and request that the County deny the Project. Sierra Club specifically protests a scenario where the County would approve the MUP and Reclamation Plan for this Project.

Christopher Jacobs
June 11, 2025
Page 6

II. The FEIR Failed to Recirculate Substantial New Analysis in Several Topical Areas.

As the FEIR acknowledges, under CEQA, “[R]ecirculation is generally required when new information is added to an EIR that would deprive the public of a meaningful opportunity to comment on substantial adverse environmental impacts. (California Environmental Quality Act [CEQA] Guidelines, Section 15088.5.) The purpose of recirculation is to give the public and agencies the opportunity to evaluate changes in the project, new information or analysis, or new conclusions relating to the significance of impacts, and submit comments on the same.” FEIR All Topics Responses, Topical Response 1 at pages 1 and 2. The County recirculated portions of the DEIR including analysis of impacts from additional trucks needed to transport additional fill necessary at the site; additional biological surveys for certain species that were not adequately evaluated prior, and a Stormwater Quality Management Plan (SWQMP) for Priority Development Projects. *Id.* Yet the RDEIR failed to recirculate data supporting the substantial number of addenda to the EIR’s technical appendices. *See*, FEIR, Topical Responses to Comments, Topical Response 3 – EIR Errata and Updated Technical Reports, pages 5 to 12. This approach works directly against the stated purpose of recirculation, to give the public and agencies a change to evaluate changes, new information, analysis, or new conclusions.

For example, in their comments on the RDEIR, the San Diego County Air Pollution Control District (“District”) pointed out that although the RDEIR indicates that operational emissions were re-modeled to account for more truck trips, sand extraction activities, and fugitive dust emissions, the supporting data and analysis were not provided. FEIR, RDEIR Responses to Comments Federal and State Agencies, comment and response R-A2-2 at pages 4 and 5. The FEIR response refers readers to review the Air Quality Technical Report, Appendix I, which contains data and analysis dated 2021 and 2022, and FEIR Topical Response 3 – EIR Errata and Updated Technical Reports. The latter contains only a summary of the modeling conclusions rather than the revised data sheets and full analysis requested by the District. Holding back the data prevents reviewers from evaluating the accuracy of it and from asking additional clarification questions.

Similarly, the California Department of Fish and Wildlife (“CDFW”) DEIR comments pointed out that several of their comments related to hydrological design were not incorporated into the RDEIR. FEIR, RDEIR Responses to Comments Federal and State Agencies, comment and response R-A4-3 at page RTC-11. Instead, the requested changes and responses to the agency’s comments are included in the FEIR. This approach

Christopher Jacobs
June 11, 2025
Page 7

of withholding data from recirculation circumvents the public's and responsible agency's opportunity to review the new analysis in detail and provide comments on the changes.

In another example, the Sweetwater Authority provided DEIR comments expressing concern about the Project impacting water transfers from Loveland Reservoir to Sweetwater Reservoir and pointing to necessary revisions to the EIR Drainage Study (Appendix O). FEIR, Responses to RDEIR Comments, Comment R-A3-2 at page 7. The Sweetwater Authority requested additional water transfer data, which were not provided in the RDEIR. *Id.* The FEIR includes revisions to the Drainage Study, which include changes to the river channel design capacity, which affect the amount of flow in the river, and in turn, the aforementioned water transfers. Yet, these revisions were not provided in the RDEIR, curtailing the commenter's ability to review and comment on the changes. *Id.*

The FEIR also includes addenda to other technical appendices, yet the public did not have the benefit of a formal comment period to review those changes and responses to the comments. For instance, the Acoustical Assessment, and the Transportation Analysis both have addenda, but were not included in the RDEIR. *See*, FEIR, Topical Responses to Comments, Topical Response 3 – EIR Errata and Updated Technical Reports, pages 5 to 12. In sum, the EIR's failure to recirculate all substantive changes to the Project and analysis of the Project's impacts with the RDEIR results in limiting the public's review of the new information and frustrating the public comment process.

III. The FEIR Inadequately Responds to Comments Raised on the EIR.

In an FEIR, a lead agency must respond to all comments made on the DEIR. Pub. Res. Code § 21091(d); CEQA Guidelines §§ 15088(a), 15132. When a comment objects to the DEIR's analysis and raises significant environmental issues, the FEIR's response must give a reasoned, good-faith analysis and “describe the disposition of significant environmental issues raised,” such as how revisions to the project will mitigate anticipated impacts. CEQA Guidelines § 15088(c). Comments must be “addressed in detail giving reasons why specific comments and suggestions were not accepted.” *Id.*

Detailed responses are required to “ensure that the lead agency will fully consider the environmental consequences of a decision before it is made.” *City of Long Beach v. Los Angeles Unified Sch. Dist.* (2009) 176 Cal.App.4th 889, 904. The required level of detail “depends on factors such as the significance of the issues raised, the level of detail of the proposed project, the level of detail of the comment, and the extent to which the matter is already addressed in the DEIR or responses to other comments.” *Id.* at 901. Generally, the level of detail in the response must match the level of detail in the comment. *Pfeiffer v. City of Sunnyvale* (2011) 200 Cal.App.4th 1552, 1568. “Conclusory

Christopher Jacobs
 June 11, 2025
 Page 8

statements unsupported by factual information” are never an adequate response. Guidelines § 15088(c); *City of Maywood v. Los Angeles Unified Sch. Dist.* (2012) 208 Cal.App.4th 362, 391.

In numerous instances, the FEIR’s responses to comments fail to meet these requirements. Some responses do not sufficiently address the comment. In other cases, the responses ignore comments entirely or refer the reader to unrelated responses, none of which address the comment.

The FEIR includes many instances of this incongruity between valid comments and inadequate responses. For instance, Comment D-08-2 comments on the EIR’s failure to adequately describe baseline conditions, including the fact that portions of the site are within Multi-species Conservation Plan (“MSCP”) areas, are identified as Biological Resource Core Area (“BRCA”), and/or identified Pre-Approved Mitigation Areas (“PAMAs”). See, FEIR, DEIR Responses to Comments, comment D-08-2, at page 80. The FEIR response fails on several fronts. First it states that the “comment is not in disagreement with Project analyses, and no response is necessary,” when in reality the comment describes a baseline flaw, and a response is indeed required. Second, the response states that the areas designated under the MSCP would not be “touched,” presumably meaning they would not be mined. *Id.* This response fails to consider indirect impacts such as changes in surface water and groundwater levels that would impact vegetation and habitat in adjacent areas. Finally, the response fails to address the portion of the comment related to habitat corridor linkage between preserved BRCA’s. *Id.* at p. RTC-81.

This approach runs afoul of CEQA’s mandate that in responding to comments, an agency must provide a reasoned analysis supported by factual information. CEQA Guidelines § 15088(c). The County has not shown a good faith effort to consider public input, much less modify the EIR as a result.

IV. The FEIR Fails to Correct Errors and Omissions in the Analyses of and Mitigation for the Project’s Environmental Impacts.

Rather than comprehensively correcting the errors and omissions in the EIR and providing meaningful disclosure of the Project’s environmental impacts, the FEIR largely seeks to defend the erroneous assertions and conclusions of its predecessors. This letter does not reiterate the comment from our prior submittals or from the respective attachments. Instead, we focus on the flawed discussion of the baseline conditions. Failing to correct the discussion of baseline conditions infects the remainder of the EIR and leads to the EIR’s failed analyses of the Project’s broader environmental impacts.

Christopher Jacobs
 June 11, 2025
 Page 9

One of the key areas where the FEIR fails to correct the faulty baseline is for biological resources. As explained in our prior comments, the environmental review for this project has been protracted. It began with the issuance of a Notice of Preparation (NOP) on October 24, 2019. Two years later, the Notice of Availability for the Draft EIR was published on December 16, 2021. A year and a half after that, the Notice of Availability for the Recirculated Draft EIR was published on June 29, 2023. A year later, the FEIR was published, *six years* after the start of the environmental review process.

CEQA provides that the date of the Notice of Preparation (“NOP”) is “normally” the date upon which the DEIR’s baseline conditions should be set. CEQA Guidelines § 15125. However, as the courts have emphasized, “in some cases, conditions closer to the date the project is approved are more relevant to a determination whether the project’s impacts will be significant.” *Save Our Peninsula Comm. v. Monterey County Board of Supervisors* (2001) 87 Cal.App 4th 99, 125. In addition, CEQA allows that a lead agency may define the baseline differently where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project’s impacts. CEQA Guidelines § 15125(a)(1).

In the case of this Project, the use of a more current baseline for the purposes of assessing impacts to sensitive habitat is not only acceptable, but imperative. First, the EIR continues to describe site conditions largely based on surveys conducted in 2018 and 2019 (e.g., RDEIR at 2.2-2 and 2.2-3) with some additional surveys in 2022. *See also*, FEIR Technical Appendix C, Biological Resources Report Par 1, at pages S-1, 6, 7, and 9. The EIR continues to mischaracterize site conditions and to describe conditions during and following one of the worst droughts in California history. *See*, SMW RDEIR comments on behalf of Sierra Club, dated August 19, 2023, at page 6. As we explained in that comment letter, current site conditions are dramatically different than described in the DEIR or RDEIR. For example, changes in rainfall have resulted in substantial areas of healthy Southern Willow Scrub and Non-native grassland and have altered and improved the Sweetwater River channel. *Id.* at Appendix A, Hamilton Report at 9 and photos at pages 11-17. The changed conditions on the site warrant an updated description of existing conditions and use of a different baseline to evaluate the Project’s impacts.

For the evaluation of impacts to the arroyo toad in particular, the EIR still relies on survey data from 2019. FEIR at p. 2.2-3. This approach is untenable. As we explained in our comments dated August 19, 2023, and as Hamilton Biological pointed out in the DEIR and RDEIR comments, the surveys for arroyo toad (a federally endangered species) are inadequate and cannot be used to rule out the presence of this species. The EIR fails to remedy this failure. The RDEIR provides inadequate information to evaluate the adequacy of the 2019 survey, and no reassessment was made in 2023 after large areas

Christopher Jacobs
June 11, 2025
Page 10

of willow-riparian scrub naturally regenerated throughout the Sweetwater River channel. SMW RDEIR comments on behalf of Sierra Club, dated August 19, 2023, at Appendix A, Hamilton Report at 20 and 36. Moreover, as discussed above, there is evidence in the record that this species is inhabiting the Project area. According to Sweetwater Authority Biologist, Pete Famolaro, who has spent decades studying arroyo toads, “[T]his is perfect habitat for the arroyo toad.” Dr. Robert Fisher, a biologist with the U.S. Geological Survey – Western Ecological Research Center, who has also spent his career studying the arroyo toad, indicates that “[The watershed] was occupied by toads and by phenomenal numbers of toad.” *See*, SMW Supplemental Comments on the RDEIR on behalf of Sierra Club dated September 1, 2023, attached as Attachment A.

The FEIR completely ignores this information, which is new since the surveys for the arroyo toad were conducted in 2019. *Id.* Given this evidence, the EIR should have performed updated surveys and should have fully evaluated impacts to this species. Instead, the FEIR perpetuated the DEIR and RDEIR’s failure to accurately document the existing setting of the site.

Under CEQA, knowledge of the regional setting is critical to the assessment of environmental impacts. “Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project.” CEQA Guidelines § 15125 (c). Especially here, where the project site is an important wildlife movement linkage between established reserves, correcting these errors is crucial. The EIR’s continued use of outdated and incorrect baseline conditions ignores reality and virtually ensures that the resultant analysis is uninformative and inaccurate.

Without consideration and analysis of these baseline conditions, the EIR lacks the substantial evidence necessary to show that the Project will not impact the abundant biological resources at the proposed Project site.

V. The FEIR Prematurely Dismisses Alternatives.

The EIR fails to comply with the requirements of CEQA because it fails to undertake a legally sufficient study of alternatives to the Project. A proper analysis of alternatives is essential to comply with CEQA’s mandate that, where feasible, significant environmental damage be avoided. Pub. Resources Code § 21002 (projects should not be approved if there are feasible alternatives that would substantially lessen environmental impacts); CEQA Guidelines §§ 15002(a)(3), 15021(a)(2), 15126(f).

The primary purpose of CEQA’s alternatives requirement is to explore options that will reduce or avoid adverse impacts on the environment. Pub. Res. Code § 21002;

Christopher Jacobs
 June 11, 2025
 Page 11

CEQA Guidelines §§ 15002(a)(3), 15021(a)(2), 15126(d); *Watsonville Pilots Assn. v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1089. Therefore, the discussion of alternatives must focus on project alternatives that are capable of avoiding or substantially lessening the significant effects of the project, even if such alternatives would impede to some degree the attainment of the project objectives or would be more costly. CEQA Guidelines § 15126.6(b).

As a preliminary matter, the EIR's perpetuation of its failure to disclose the extent and severity of the Project's broad-ranging impacts, as discussed in this letter and in our prior comments, necessarily distorts the document's analysis of Project alternatives. As a result, the alternatives are evaluated against an inaccurate representation of the Project's impacts. The FEIR fails to correct these flaws. Proper identification and analysis of alternatives is impossible until Project impacts are fully disclosed. Moreover, as discussed above, the document's analysis is incomplete and/or inaccurate so that it is simply not possible to conduct a comparative evaluation of the Project's and the alternatives' impacts.

Sound planning principles dictate that the County carefully consider alternatives in the present case because the proposed Project would result in significant impacts to thousands of homes and would adversely impact habitat and wildlife linkages for dozens of special status plant and animal species. Furthermore, the Project would result in extensive impacts related to visual resources, noise, and air quality. As pointed out in our prior comments, this EIR's analysis of only two alternatives is insufficient under CEQA because the document fails to consider a reasonable range of options that would reduce Project impacts. CEQA Guidelines § 15126.6(c); *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d at 566. Especially in this case, the County has an obligation to analyze a broader range of options to reduce impacts.

The fact that the applicant proposes a particular use for the site, does not relieve the County from exploring alternatives that would be more appropriate for the location. In our prior comments on the DEIR, Sierra Club proposed that the EIR should evaluate an alternative use of the site as a mitigation land bank providing mitigation credits for habitat restoration. See FEIR, Responses to DEIR Comments, Comment D-08-64 at page 123. Such an alternative would allow for a lucrative business while avoiding the myriad impacts to the surrounding residents, impacts to sensitive habitat and species, impacts to established wildlife preserves and the linkages to open space they provide, and hydrological impacts resulting from mining of the riverbed and surrounding floodplain. The FEIR response summarily states that "the Project Applicant has indicated that such an alternative would not be financially feasible for this site and would not achieve the Project objectives." *Id.* However, cost alone is not a legitimate basis for rejecting an

Christopher Jacobs
June 11, 2025
Page 12

alternative from EIR consideration. CEQA Guidelines § 15126.6(f)(1); *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1460 (“[T]he willingness or unwillingness of a project proponent to accept an otherwise feasible alternative is not a relevant consideration.”). Moreover, the FEIR fails to provide any research or analysis as supporting evidence to show that a mitigation bank alternative would not be financially feasible.

In sum, the EIR fails to provide evidence that other alternatives are infeasible and offers only unsupported irrelevancies instead of any legitimate justification for rejecting the alternative proposed by Sierra Club. The EIR fails to provide estimated costs and/or cost/benefit analyses evaluating the proposed alternative. Therefore, the EIR fails to support its conclusion with substantial evidence.

VI. Conclusion

As discussed throughout this letter, the EIR’s analysis understates the severity of the potential harm to area residents, protected sensitive habitat and special status biological resources, groundwater resources and water quality, and air quality, among others as described in Sierra Club’s prior comments. Having failed to rigorously evaluate the impacts, the EIR neglects to identify sufficient mitigation to minimize these impacts. The Project’s impacts were not adequately analyzed and mitigated, nor are they remedied in the FEIR. The EIR can support neither the findings required by CEQA nor a determination of General Plan consistency. For the foregoing reasons, Sierra Club protests any approval of the proposed Project, supports staff’s recommendations, and urges the County to deny the Project.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Catherine C. Engberg
Kevin P. Bundy
Carmen J. Borg, AICP
Urban Planner

Christopher Jacobs
June 11, 2025
Page 13

cc: Susan Wynn, USFWS
Jonathan Snyder, USFWS
David Mayer, Regional Supervisor, CDFW
Heather Schmalbach, CDFW
Dahvia Lynch, Director, County Planning & Development Services
Bethany Principe, Coordinator, County Parks and Recreation MSCP Program
Stephanie Neal, County, Sustainability Planning Division
Peter Andersen
Dave Hogan
Lisa Ross
Elizabeth Urquhart
Dan Weber
Barry Jantz
Richard Miller

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CATHERINE C. ENGBERG
Attorney
Engberg@smwlaw.com

September 1, 2023

Via E-Mail

Mr. Christopher Jacobs
Land Use/Environmental Planner
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
E-Mail: christopher.jacobs@sdcounty.ca.gov

Re: Cottonwood Sand Mining Project (PDS2018-MUP-18-023),
(PDS2018-RP-18-001); Log No. PDS2018-ER-18-19-007; SCH#
2019100513

Dear Mr. Jacobs:

We submit this letter on behalf of the Sierra Club San Diego Chapter (“Sierra Club”). As you know, we submitted comments on behalf of Sierra Club on the Recirculated Draft Environmental Impact Report (“RDEIR”) for the proposed Cottonwood Sand Mining Project (“Project”) two weeks ago on August 19, 2023. Our letter included comments regarding the need to employ a different baseline for biological resources due to changed conditions on the Project site that have resulted in substantial areas of healthy Southern Willow Scrub and Non-native grassland, and have altered and improved the Sweetwater River channel. Since then, news articles have been aired and/or published about the Project and the existing biological setting of the project site. As discussed further below, we are writing to inform the County of the relevant news article and to request that you consider these supplemental comments. We request that this letter be entered into the Administrative Record for the Project.

NBC 7 San Diego aired a television news segment and published a news article, both of which discuss the status of endangered arroyo toads in the Sweetwater River downstream from the Loveland Reservoir, where the proposed Cottonwood Sand Mining Project would be located. See the television news segment at this link: <https://www.nbcsandiego.com/videos/storms-water-district-give-hope-to-endangered-san-diego-county-arroyo-toad->

Christopher Jacobs
September 1, 2023
Page 2

[species/3290679/?fbclid=IwAR3uoUAsTpyNt_F6xL3jAsurfDavG0JuLbzq2MNQRsbLBmzEDRQ7ZpXMUVs](https://www.species/3290679/?fbclid=IwAR3uoUAsTpyNt_F6xL3jAsurfDavG0JuLbzq2MNQRsbLBmzEDRQ7ZpXMUVs); and the news article attached to this letter as Attachment A. The segment and article (henceforth referred to as “news article”) explain that water releases from the Loveland Reservoir, combined with a rainy winter, resulted in resurgence of the arroyo toad population, because the toads rely on water for breeding habitat. Id. The water flow from Loveland Reservoir, above the golf course to the east, flows through the golf course, and then to the Sweetwater Reservoir below the golf course to the west.

According to Sweetwater Authority Biologist, Pete Famolaro, who has spent decades studying arroyo toads, “[T]his is perfect habitat for the arroyo toad.” Dr. Robert Fisher, a biologist with the U.S. Geological Survey – Western Ecological Research Center, who has also spent his career studying the arroyo toad, indicates that “[The watershed] was occupied by toads and by phenomenal numbers of toad.”

Despite the fact that the County recirculated the biological resources section of the DEIR, the document continued to rely on old surveys. For that reason, mischaracterizes site conditions and describes conditions during and following one of the worst droughts in California history. As evidenced by the attached news article, had the RDEIR conducted updated surveys, the altered conditions described in the attached news article would have been documented and considered in the revised analysis. The changed conditions on the Project site is important information from which to establish a baseline. Once an accurate baseline is established, the County should once again revise the biological resources analysis to accurately analyze the impacts of the proposed mine on the various habitat types and species found within them.

For the foregoing reasons, the Sierra Club urges the County to delay further consideration of the Project unless and until the County prepares and recirculates a revised draft EIR that fully complies with CEQA and the CEQA Guidelines.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Catherine C. Engberg
Carmen J. Borg, AICP
Urban Planner

Christopher Jacobs
September 1, 2023
Page 3

Attachment A – *NBC 7 San Diego*, “This endangered toad is experiencing a resurgence thanks to storms like Hilary and a San Diego water district,” August 23, 2023.

https://www.nbcsandiego.com/videos/storms-water-district-give-hope-to-endangered-san-diego-county-arroyo-toad-species/3290679/?fbclid=IwAR3uoUAsTpyNt_F6xL3jAsurfDavG0JuLbzq2MNQRsbLBmzEDRQ7ZpXMUVs

cc: Susan Wynn, USFWS
David Mayer, Regional Supervisor, CDFW
Heather Schmalbach, CDFW
Dahvia Lynch, Director, County Planning & Development Services
Bethany Principe, Coordinator, County Parks and Recreation MSCP Program
Stephanie Neal, County, Sustainability Planning Division
Peter Andersen
George Courser
Dave Hogan
Lisa Ross
Elizabeth Urquhart
Dan Weber
Barry Jantz
Richard Miller

1685767.1

From: [Martina Cooper](#)
To: [LUEG, PDS.PlanningCommission](#)
Subject: [External] Cottonwood Sand Mine – MUP18-023
Date: Tuesday, July 8, 2025 9:35:35 PM

Dear San Diego County Planning Commission and Supervisor Anderson,

My name is Martina Cooper and I am a resident of Rancho San Diego. I am writing to express my strong opposition to the proposed Cottonwood Sand Mine (MUP18-023) at the site of the former Cottonwood Golf Course.

This project would have a profoundly negative impact on our community's health, safety, and overall quality of life. As a local resident, I am especially concerned about:

- Air quality and health risks, including dust, diesel emissions, and the increased risk of Valley Fever—especially for children and vulnerable individuals.
- Environmental degradation, such as destruction of wildlife habitat, noise pollution, and loss of natural beauty that has defined our neighborhood for decades.
- Traffic and safety hazards caused by hundreds of heavy trucks moving in and out of our residential area each day.
- Negative effects on property values, peace of mind, and community character.

The Draft Environmental Impact Report clearly admits that some environmental harms will remain significant and unavoidable. This alone should disqualify the project, especially in such a densely populated and family-oriented neighborhood.

I urge you to prioritize the well-being of residents over short-term industrial interests and reject the Cottonwood Sand Mine proposal. There are other locations far more suitable for mining—this is not one of them.

Thank you for your time and your service to our community.

Sincerely,

Martina Cooper

Rancho San Diego Resident

From: [Teri Storm](#)
To: [LUEG, PDS.PlanningCommission](#)
Subject: [External] Cottonwood Sandmine
Date: Monday, June 30, 2025 5:55:52 PM

Good evening,

I attended the June 13, 2025 meeting regarding the Cottonwood Sandmine.

The meeting was cancelled and rescheduled for July 9, 2025, however due to work constraints, I am unable to attend this next meeting. I previously filled out an opposition sheet and planned to speak at the meeting. Will my opposition sheet still be counted?

I have been a Cottonwood resident for 39 years. My backyard overlooks the golf course.

When we purchased our home 39 years ago the Cottonwood Golf Course was to be a "recreational area". This is a beautiful area, if you haven't had a chance to view it yourself, I encourage you to drive up to the top of Windriver and view the Valley yourself. It is breathtaking! If a sand mine would go in there it would damage the beautiful and serene valley. A sand mine would disrupt endangered as well as un-endangered wildlife that consider this valley their home. In addition, the Native Americans who were the first humans to inhabit the valley, undoubtedly have sacred artifacts buried that would be unearthed during this process, with no real promise of preserving or returning them to their rightful owners. The daily truck traffic, noise pollution and air quality issues for surrounding residents, along with reduced property value are added concerns. I feel this valley should be preserved rather than destroyed, this is not the place for an industrial sand mine operation!!!

I beg you to vote against this project!!

Sincerely,
Teri Storm

From: [Trina Asaro](#)
To: [LUEG, PDS.PlanningCommission](#)
Subject: [External] Cottonwood Sand Mining Project
Date: Sunday, June 29, 2025 10:56:04 AM

My concern with the project is two things.

1. Silica Dust: The mining and processing of sand, particularly fracsand used in hydraulic fracturing, can release tiny particles of silica dust (respirable crystalline silica or RCS into the air. Prolonged exposure to RCS can cause serious health problems, including silicosis (a lung disease) Lung cancer and other respiratory ailments like asthma and bronchitis. Nearby residents, especially children and vulnerable populations, may experience health issues.
2. Because of this our property values could be affected. We respectfully ask to deny this project..

Trina Asaro
619-933-7406
Cottonwood resident

From: [Mikayla Mitchell](#)
To: [LUEG, PDS.PlanningCommission](#)
Cc: [Jacobs, Christopher](#)
Subject: [External] OPPOSE Cottonwood Sand Mine Project – PDS2018-MUP-18-023
Date: Monday, July 7, 2025 4:59:34 PM

Dear Members of the Planning Commission,

I am writing to strongly **oppose the proposed Cottonwood Sand Mining Project** (PDS2018-MUP-18-023 / RP-18-001) planned for the former Cottonwood Golf Club site in Rancho San Diego. After carefully reviewing the Final Environmental Impact Report and listening to community testimony, I urge you to **deny the Major Use Permit** for this project.

1. Community Character & Land Use

- The project would transform over **214 acres of golf course** into a **10-year open-pit mining operation**, situated within an established residential, civic, and recreational corridor. This fundamentally conflicts with the **Valle de Oro Community Plan** and the Rancho San Diego Specific Plan

[youtube.com+10sandiegocounty.gov+10stopcottonwoodsandmine.com+10youtube.comstopcottonwoodsandmine.com](https://www.youtube.com/watch?v=10sandiegocounty.gov+10stopcottonwoodsandmine.com+10youtube.comstopcottonwoodsandmine.com).

- The Valle de Oro Community Planning Group has voted overwhelmingly to **recommend denial** of the project [stopcottonwoodsandmine.com+1obrag.org+1](https://www.stopcottonwoodsandmine.com+1obrag.org+1).

2. Environmental & Health Risks

- The EIR identifies significant concerns related to **air quality, noise, traffic safety**, and impacts to **riparian habitat** of the Sweetwater River [youtube.com+10sandiegocounty.gov+10sandiegocounty.gov+10](https://www.youtube.com/watch?v=10sandiegocounty.gov+10sandiegocounty.gov+10).
- Trucking operations are estimated at **176 round-trips daily**, translating into **heavy truck traffic every 2 minutes** along Willow Glen Drive directly affecting nearby schools, homes, and businesses [stopcottonwoodsandmine.com+1sandiegocounty.gov+1](https://www.stopcottonwoodsandmine.com+1sandiegocounty.gov+1).
- Cumulative concerns about dust, emissions, runoff, and habitat disruption raise serious public health and ecological red flags.

3. Timing & Public Process

- Intense public opposition, including **hundreds of letters, thousands of residents at community hearings**, and multiple delays of Planning Commission hearings, reflect unresolved community concerns and flawed EIR processes [cbs8.com+10stopcottonwoodsandmine.com+10stopcottonwoodsandmine.com+10](https://www.cbs8.com+10stopcottonwoodsandmine.com+10stopcottonwoodsandmine.com+10).
- The Commission's postponement of its decision multiple times underscores the need for further evaluation before proceeding [nbcsandiego.com+2nbcsandiego.com+2youtube.com+2](https://www.nbcsandiego.com+2nbcsandiego.com+2youtube.com+2).

My Request to the Commission:

- Do not approve the Major Use Permit** for the Cottonwood Sand Mine Project.
- Embrace the **No Project Alternative** outlined in the EIR, keeping the site consistent with current community use and minimizing environmental disruption.
- Honor the voices of nearby residents, community planning groups, and environmental advocates who have voiced consistent opposition over several years.

Thank you for your thoughtful consideration of my concerns. Please let me know how I can remain engaged in this public process moving forward.

Thank you!

Mikayla Mitchell, 3rd generation San Diegan

Steele Canyon HS 06'

Hillsdale Middle School

RSD Elementary

This is my home.

From: [Teri Storm](#)
To: [LUEG, PDS.PlanningCommission](#)
Subject: [External] Re: Cottonwood Sandmine
Date: Saturday, July 5, 2025 7:00:27 AM

Good morning, just want to make a clarification from my last email, my legal name is Teri Davies-Storm in case that makes a difference.

Thank you.

Kind regards!

On Mon, Jun 30, 2025, 5:55 PM Teri Storm <tdstorm3@gmail.com> wrote:

Good evening,

I attended the June 13, 2025 meeting regarding the Cottonwood Sandmine.

The meeting was cancelled and rescheduled for July 9, 2025, however due to work constraints, I am unable to attend this next meeting. I previously filled out an opposition sheet and planned to speak at the meeting. Will my opposition sheet still be counted?

I have been a Cottonwood resident for 39 years. My backyard overlooks the golf course.

When we purchased our home 39 years ago the Cottonwood Golf Course was to be a "recreational area". This is a beautiful area, if you haven't had a chance to view it yourself, I encourage you to drive up to the top of Windriver and view the Valley yourself. It is breathtaking! If a sand mine would go in there it would damage the beautiful and serene valley. A sand mine would disrupt endangered as well as un-endangered wildlife that consider this valley their home. In addition, the Native Americans who were the first humans to inhabit the valley, undoubtedly have sacred artifacts buried that would be unearthed during this process, with no real promise of preserving or returning them to their rightful owners. The daily truck traffic, noise pollution and air quality issues for surrounding residents, along with reduced property value are added concerns. I feel this valley should be preserved rather than destroyed, this is not the place for an industrial sand mine operation!!!

I beg you to vote against this project!!

Sincerely,

Teri Storm

From: [Paul R.S.](#)
To: [Jacobs, Christopher](#)
Subject: [External] Re: Notice of Public Hearing for the Cottonwood Sand Mine Project
Date: Friday, June 27, 2025 1:57:11 PM
Attachments: [image001.png](#)
[1000022669.jpg](#)
[image001.png](#)

Can't imagine turn it from this to a sand pit.



prs

On Fri, Jun 27, 2025, 10:25 AM Jacobs, Christopher <Christopher.Jacobs@sdcounty.ca.gov> wrote:

Greetings,

Attached please find the Notice of Public Hearing for the Cottonwood Sand Mine Project. The Planning Commission hearing is on 7-9-25 at the location identified in the notice. Please note that the Planning & Development Services Department is recommending denial of the Project. The recommendation of denial is due to the difficulty in making all the Major Use Permit (MUP) findings that are required in Zoning Ordinance section 7358, particularly that the Project will not have a harmful impact on the desired community character and that the site is suitable for a mine. The Final Environmental Impact Report (EFIR) is posted on the County web site at <https://www.sandiegocounty.gov/pds/ceqa/MUP-18-023.html>. The Planning Commission may choose to certify the FEIR should the Commission disagree with the staff recommendation and approve the Project (MUP + Reclamation Plan).

Sincerely,

Chris Jacobs (*he/him/his*)

Land Use/Environmental Planner III – Project Planning

County of San Diego - Planning & Development Services (PDS)

[5510 Overland Avenue](#), Second Floor

San Diego, CA 92123

Phone: 619-323-8718



From: [Irene McCormack](#)
To: [LUEG_PDS.PlanningCommission](#)
Subject: [External] Sand Mining in Cottonwood -- reject it. -- July 9 hearing.
Date: Monday, July 7, 2025 3:44:08 PM

Planning commissioners,
Please reject the Cottonwood sand mining application. This is the WRONG use for this environmentally sensitive property along a river.

Respectfully,
Irene McCormack Jackson
Resident on Avenida Marcella, 92019.

Irene McCormack
619-251-5807
irenemcmack@gmail.com
irenemack@cox.net
Text, email or call.

From: [JOANNE BAILIE](#)
To: [LUEG, PDS.PlanningCommission](#)
Subject: [External] Sandmine
Date: Monday, July 7, 2025 11:24:53 PM

I previously emailed that I was against the sand mine. I never received anything back. I want to repeat. I am against the sandmine in my community. Please confirm you received this. Thank you Joanne Bailie 11582 Avenida Marcella El Cajon, CA 92019 homeowner since March 1986.
Sent from my iPhone

<https://www.sandiegocounty.gov/pds/ceqa/MUP-18-023.html>. The Planning Commission may choose to certify the FEIR should the Commission disagree with the staff recommendation and approve the Project (MUP + Reclamation Plan).

Sincerely,

Chris Jacobs *(he/him/his)*

Land Use/Environmental Planner III – Project Planning

County of San Diego - Planning & Development Services (PDS)

5510 Overland Avenue, Second Floor

San Diego, CA 92123

Phone: 619-323-8718



From: [Jacobs, Christopher](#)
To: [LUEG, PDS.PlanningCommission](#)
Subject: FW: [External] Re: Notice of Public Hearing for the Cottonwood Sand Mine Project
Date: Monday, June 30, 2025 8:31:28 AM
Attachments: [image001.png](#)

Greetings,

Please see Cottonwood comment, below. Thank you,

Chris Jacobs (*he/him/his*)

Land Use/Environmental Planner III – Project Planning
County of San Diego - Planning & Development Services (PDS)
5510 Overland Avenue, Second Floor
San Diego, CA 92123
Phone: 619-323-8718



From: farah albana <farahalbana2007@yahoo.com>
Sent: Monday, June 30, 2025 8:17 AM
To: Jacobs, Christopher <Christopher.Jacobs@sdcounty.ca.gov>
Subject: [External] Re: Notice of Public Hearing for the Cottonwood Sand Mine Project

Just go away from our area , we refuse your project.

[Yahoo Mail: Search, Organize, Conquer](#)

On Fri, Jun 27, 2025 at 12:57 PM, Jacobs, Christopher
<Christopher.Jacobs@sdcounty.ca.gov> wrote:

Greetings,

Attached please find the Notice of Public Hearing for the Cottonwood Sand Mine Project. The Planning Commission hearing is on 7-9-25 at the location identified in the notice. Please note that the Planning & Development Services Department is recommending denial of the Project. The recommendation of denial is due to the difficulty in making all the Major Use Permit (MUP) findings that are required in Zoning Ordinance section 7358, particularly that the Project will not have a harmful impact on the desired community character and that the site is suitable for a mine. The Final Environmental Impact Report (EFIR) is posted on the County web site at