CLERK OF THE BOARD OF SUPERVISORS

EXHIBIT/DOCUMENT LOG

MEETING DATE & AGENDA NO. 09/10/2025 #06

STAFF DOCUMENTS (Numerical)

No.	Presented by:	Description:
1.	County Staff	20 page PowerPoint Presentation
2.		
3.		
4.		

PUBLIC DOCUMENTS (Alphabetical)

No.	Presented by:	Description:
A.	Bob Collins	6 page document
B.	Brittany Waddell	6 page document
C.	Josan Feathers	1 page document
D.	Brian Davis	9 page document
E.	Alonso Gonzalez	2 page document
F.	Terri Davies-Storm	1 page document
G.	Elizabeth Urquhart, Dianne Jacob, Brian Lorenz, Barry Jantz	45 page document
H.	Lisa Ross, Ron Askeland, Michael King, Charles Rilli, Peter Andersen	8 page PowerPoint Presenation
I.	Jennifer Lynch, James DeCarolis, Maddy Kilkenny	22 page PowerPoint Presentation

OFFICIAL RECORD
Clerk of the Board of Supervisors
County of San Diego

Exhibit No. 1

Meeting Date: 09/10/2025 Agenda No. 06

Presented by: County Staff

County of San Diego

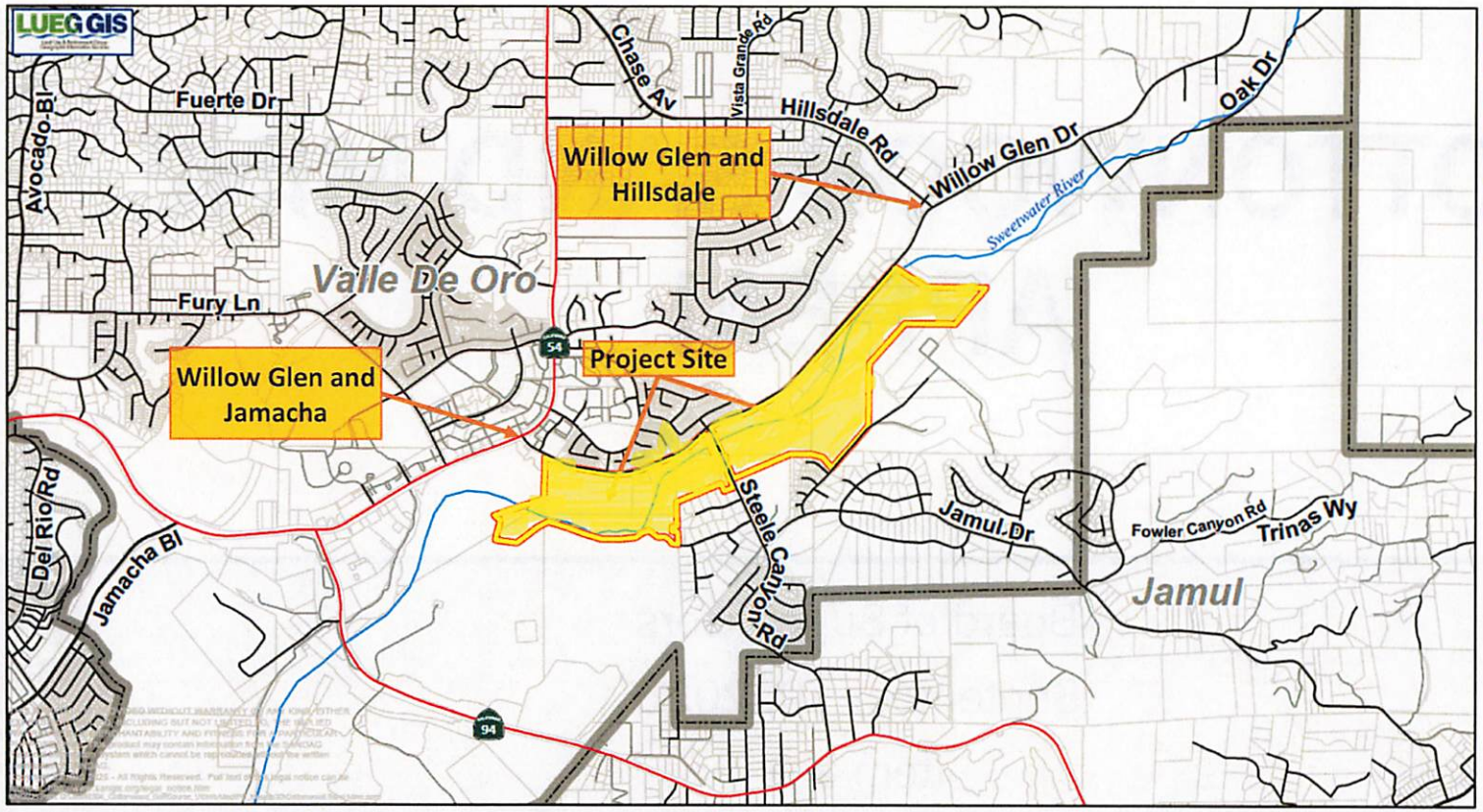
COTTONWOOD SAND MINE APPEAL

Board of Supervisors

September 10, 2025

Item # 6

Vicinity Map



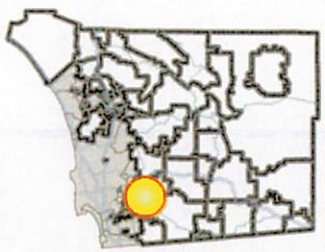
Cottonwood Sand Mine

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

Vicinity

Valle De Oro
Community Plan Area

Roads
Site
Parcels
Incorporated
CPA



N

0 0.25 0.5
Miles

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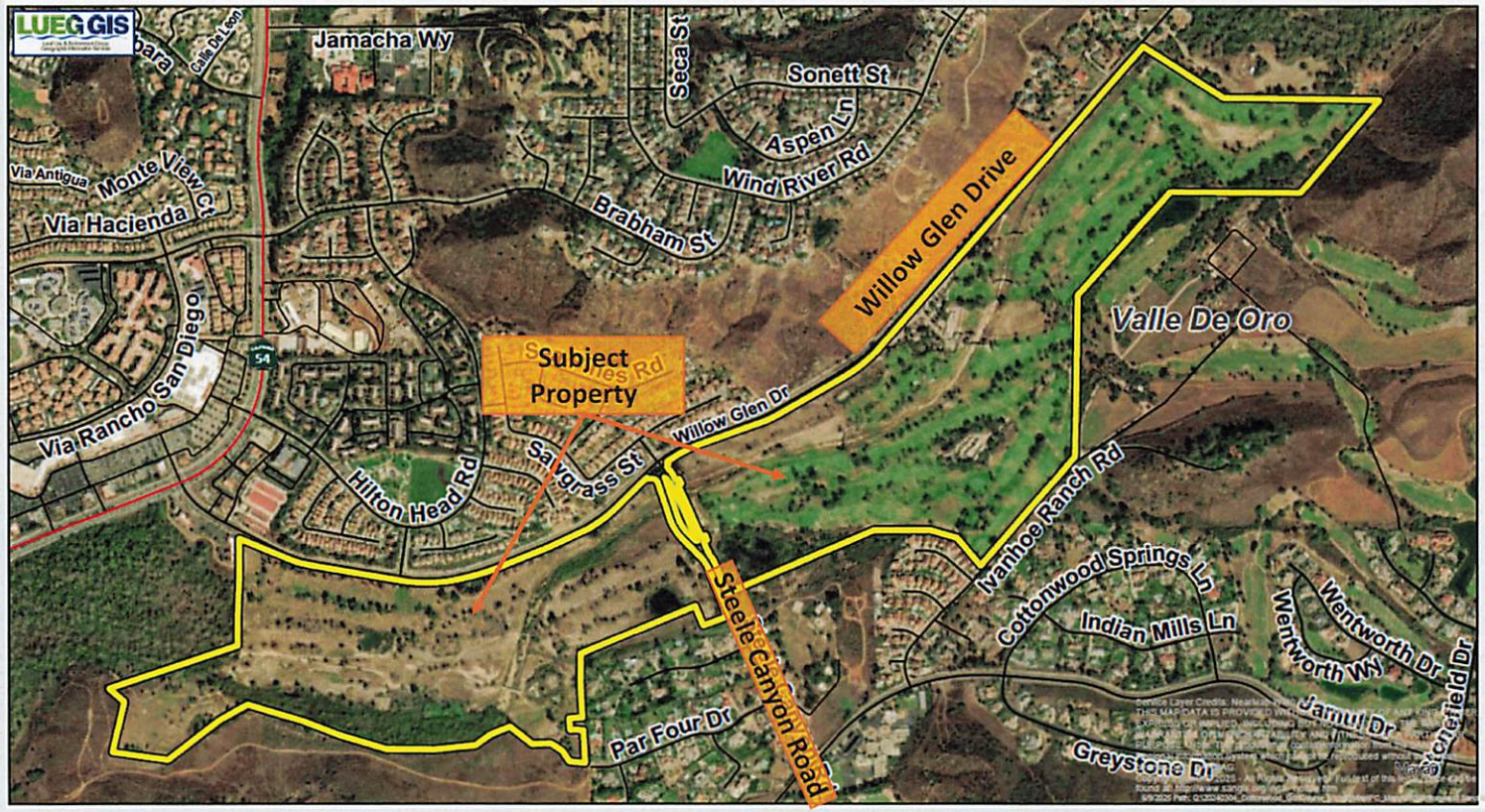
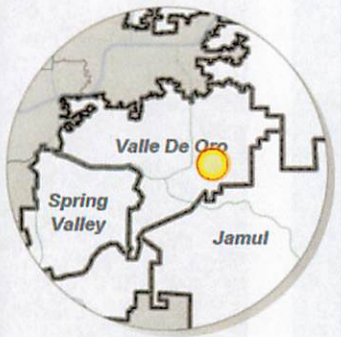
Existing Site



Cottonwood Sand Mine
PDS2018-MUP-18-023,
PDS2018-RP-18-001,
PDS2018-ER-18-19-007
Aerial
Valle De Oro Community Plan Area

Roads
Site
CPA



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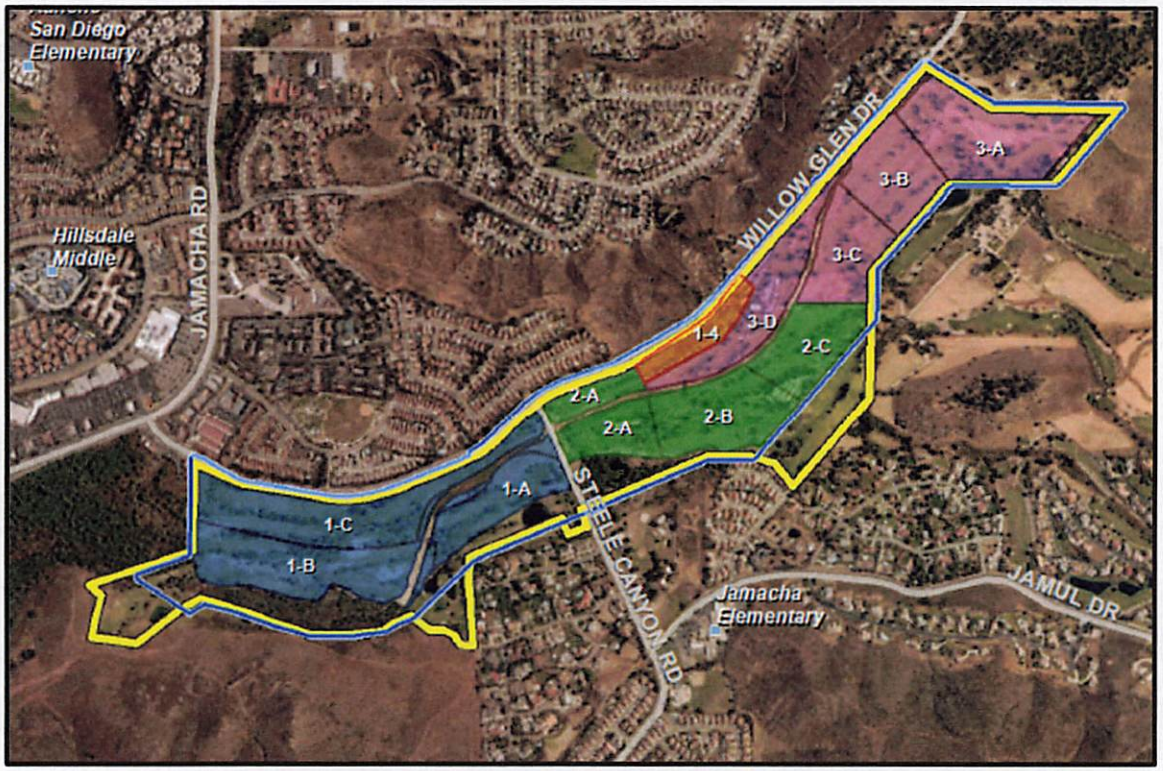
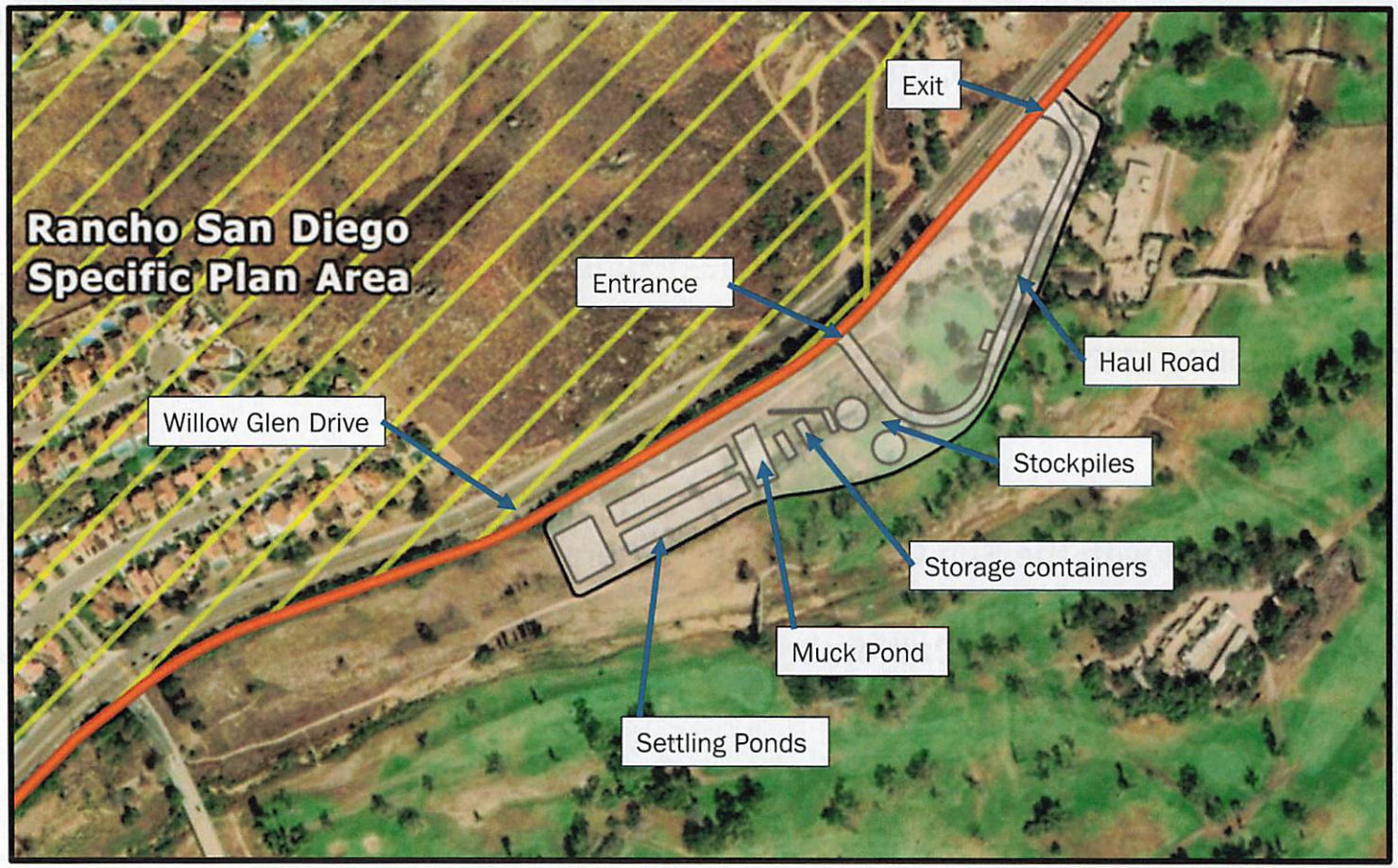
Feet

Project Description



- Major Use Permit
  - 10 years
- Reclamation Plan
  - Additional 2 years
- 3 Phases
- 12 Subphases
  - 30 acres or less per subphase

Processing Plant Area



Reasons for Staff Recommendation: MUP Findings

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

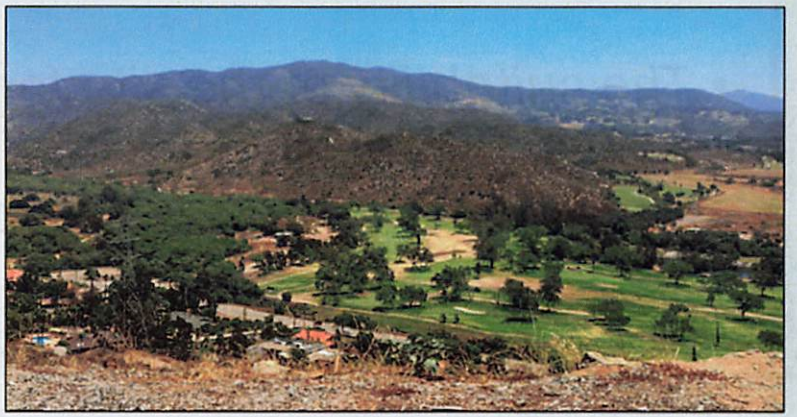
b. That the impacts, as described in paragraph "a" of this section, and the location of the proposed use will be consistent with the San Diego County General Plan.

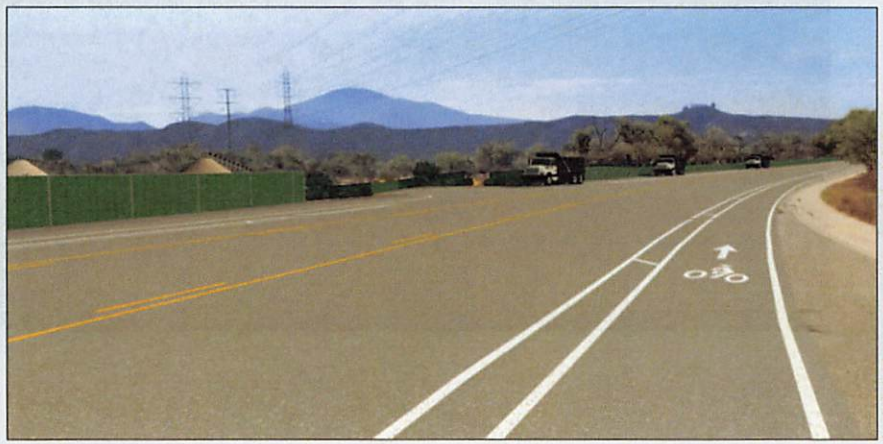
c. That the requirements of the California Environmental Quality Act have been complied with.

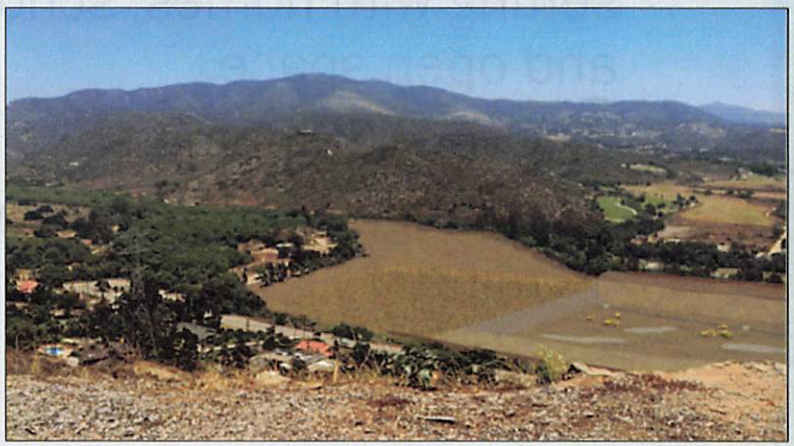
Major Use Permit Finding 3

The harmful effect, if any, upon desirable neighborhood character.

- Haul trucks added to roads
- On-site heavy machinery
- Changes to the look of the site

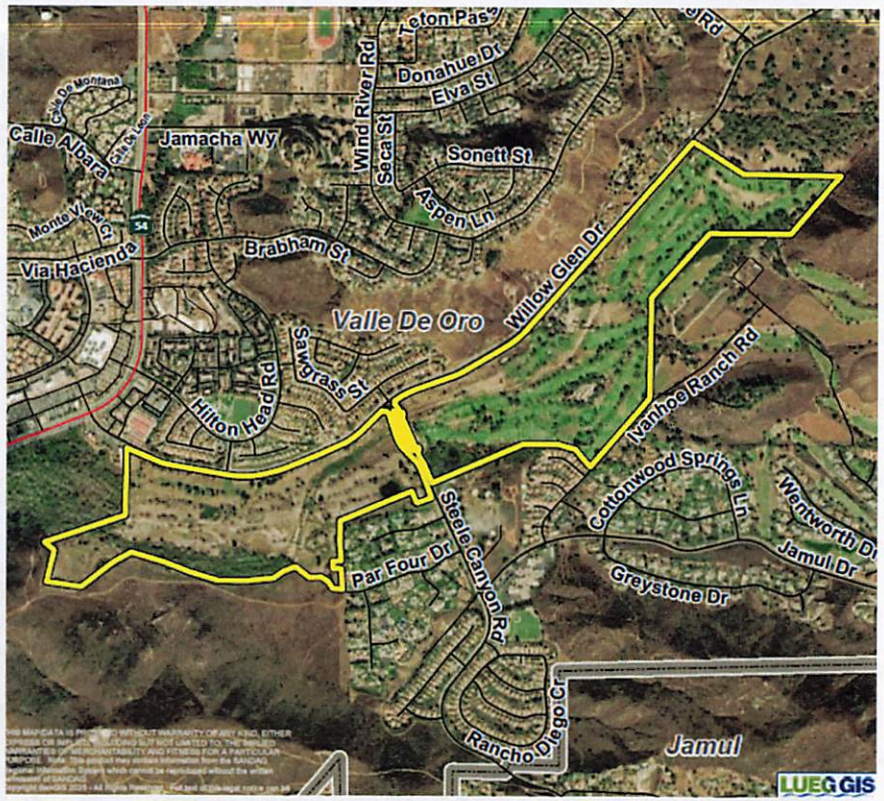






Major Use Permit Finding 5

- *The suitability of the site for the type and intensity of use or development which is proposed.*
  - Project is in a suburban setting with homes, schools, and open space.
    - Over 150 homes
    - Change from golf course to mine



Planning Commission Hearing

- Planning Commission Disapproved the Project on July 9, 2025
  - (3 yes, 3 noes, 0 absent, 1 vacancy)
- Appeal filed July 21, 2025

Point of Appeal #1

- Point of Appeal
  - The Planning Commission could not come to a majority decision.
- Staff Response
  - The Planning Commission disapproved the project.

Point of Appeal #2

- Point of Appeal
  - San Diego has a critical need for the Project.
- Staff Response
  - Major Use Permit Findings are made without consideration of sand resource needs.

Point of Appeal #3

- Point of Appeal
  - Grounds cited for voting against the Project are inconsistent with project description and county code.
- Staff Response
  - Planning Commission relied on evidence in the record as a whole to support Findings. Project equipment is "industrial" in nature.

Point of Appeal #4 and #5

- Points of Appeal
  - Substantial evidence in the record supports project approval.
  - No substantial evidence in the record supports project denial.

- Staff Response
  - Community Character impacts are outside the scope of the California Environmental Quality Act (CEQA).
  - The MUP Findings are intended to protect the public health, safety and welfare.
  - Substantial evidence in the record supports denial of the Project due to the inability to make Major Use Permit Findings 3 and 5.

Point of Appeal #6

- Point of Appeal
  - Project's benefits significantly outweigh its impacts.

- Staff Response
  - Staff recommended denial of the Project because the required MUP Findings 3 and 5 cannot be made, and the MUP Findings do not consider whether the benefits outweigh the impacts.

Community Planning Group Recommendations

- **Valle de Oro Community Planning Group (CPG)**
  - March 2025
    - Deny the Major Use Permit and Reclamation Plan.
    - Deny Design Exception Request.
  - August 2025
    - Uphold Planning Commission's disapproval of the Project.
- **Spring Valley and Jamul-Dulzura Community Planning Groups (CPGs)**
  - March 2025: Deny Major Use Permit and Reclamation Plan.

Environmental Impact Report (EIR)

Notice of Preparation (October 2019)

Draft EIR (December 2021)

Recirculation of EIR (June 2023)

Comments on EIR

- Traffic
- Noise
- Fire safety
- Air quality/GHG
- Cultural / tribal resources

Community Engagement

- Outreach Meetings
  - Numerous Stakeholder Meetings - 2018 to 2025
    - Agencies
    - Organizations
    - Tribal Governments
  - Public Scoping Meeting - 2019
  - Virtual Public Meeting on EIR - 2022
  - In-Person Community Meeting - 2023
  - CPG Meetings - 2018 to 2025

Actions to Consider

Option 1

- Deny appeal and sustain Planning Commission's disapproval the MUP and RP.

Option 2

- Grant the appeal and
  - Approve the Project.
  - Approve indemnification in the amount of 1.5 million dollars.
  - Certify the EIR.
    - Adopt Findings of Overriding Considerations.

Option 3:

- Request additional staff analysis and return to the Board.

Staff Recommendations

- Uphold Planning Commission Decision to Disapprove Project.
- Find that this action is not subject to environmental review.

County of San Diego

COTTONWOOD SAND MINE APPEAL

Board of Supervisors

September 10, 2025

Item # 6

OFFICIAL RECORD
Clerk of the Board of Supervisors
County of San Diego

Exhibit No. A

Meeting Date: 09/10/2025 Agenda No. 06

Presented by: Bob Collins

Bob Collins -

JAMIE SYCHAN - THRU ADAM DAY

Remarks for Cottonwood Sand Mining Permit-
Sept 2025

My name is Bob Collins

I love Rancho San Diego and oppose the proposed Sand Mining Permit.

I have lived in Rancho San Diego for over 40 years.

Rancho San Diego has a lot of open space, natural beauty and has a river running through it. The Sweetwater River. It is a wonderful setting for a residential community.

The Proposed Sand Mining operation is an industrial use that does not belong in a residential community.

The sand mining operation would destroy our scenic beauty, foul the air, compromise water quality, inhibit outdoor recreational activities and make traffic circulation (because of increased truck traffic) quite challenging.

Please consider what's best for the long- term interest of our community– the residents have a vested interest and will always be here; the sand miner on the other hand -will only be here until the sand is gone.

Please help us preserve our community for this generation and generation following us -by denying this sand mining major use permit.

Thank you

NECESITTY IS THE MOTHER OF INVENTION → MANUFACTURED SAND - SUSTITUTE FOR PORTLAND CONCRETE CEMENT.

1 PLANNING STAFF RECOGNITION - CHRIS JACOBS - Bob HIGTENEN

2 ~~FIXAVERE BEEN ADDRESSED SW AUTHORITIES CONCERNS~~

Bob Collins

Cottonwood Sand Mining MUP – Sept 2025

There are several reasons to deny the proposed MUP.

The Findings to grant Major Use Permit cannot be made per San Diego Planning staff-

Applicant can't make the findings required to grant a major use permit because of harmful effects upon neighborhood character and suitability for type and intensity of the use or development. Also, proposed use is incompatible for the site and not consistent with the San Diego County General plan.

Community Character-

The Rancho San Diego Community is a predominately residential one and an industrial use is inconsistent with good planning principles. The proposed Project is inconsistent with the Valle de Oro Community Plan and San Diego County General Plan.

Sweetwater River Watershed-

The Rancho San Diego area will be scenically degraded, as well as the adjoining open space compromised with a sand mining operation.

The Proposed mining operation would be a blight on one of the most pristine watersheds in San Diego County. The operation

would hamper natural steams which flow into the drainage course of the Sweetwater River and reduce the water available for care of the natural flora and fauna, the wildlife and source for drinking water that flows thru the golf course property to the Sweetwater Reservoir.

Sweetwater Authority-

Sweetwater Authority has commented on the proposed operation during the review process and hasn't received any feedback or had its concerns addressed.

Several concerns of the Authority but not all -are,

-loss of water by changing the river course by broadening the channel,

-cutting off the natural flow of ethereal streams which feed the river,

-impacts to water quality from sand mining processes

-impacts associated with flooding events along the river channel

-quality of fill material to be used from off-site sources to back fill after operations are complete which may compromise water quality.

-Water treatment -The Sweetwater Authority is concerned that because of the impacts to water quality it may have to treat the water to a higher level which costs would need to be passed on to its customers – the Authority serves over 200,000 customers in the South Bay.

Other concerns-

Air quality will be compromised for the residents of Rancho San Diego –

Kids at the nearby schools may not be able play on the playgrounds because of dust and particulate coming from the sand mining operation. Jamacha Elementary school is just south of the sand mining operation. Sand Mining hours of Operation are proposed to be 9 AM to 3PM Monday through Friday during regular school hours.

Seniors and others in the community may experience breathing problems while the Sand Mine is operating.

Traffic and Safety concerns-

Willow Glen is scenic roadway and is already a heavy traveled roadway. It brings traffic from Dehesa and the back country.

The Proposed project would add 150 traffic trips per day from the mining operation to an already heavily travelled roadway which would impede residents from using Willow Glen Road

which is used to get around the community. The truck operations would increase safety concerns for the walking and biking public because of the increased traffic.

Noise-

There would be significant noise from the truck traffic and from the sand mining operations itself

In Summation-

We have a beautiful and pleasant community. A great place to raise a family and participate in outdoor activities.

The Sweetwater River Watershed is one of the most pristine watersheds in San Diego County, it needs to be protected.

The proposed Sand Mining operation would disrupt our community, wildlife and plant life in the Sweetwater River, our outdoor activities, our beautiful open space and compromise the Sweetwater River Watershed.

The Project would also disturb the sacred lands of the Kumeyaay Tribe.

Please help us protect and preserve our community by denying the major use permit.

Bob Collins

Suggestions for mitigation for the RSD community if MUP is approved:

Require the Developer to convey the property he owns to the County that lies outside the mining project area.

Require Developer to fund a study to provide open space recreation on that property.

Require the Developer to pay for the development of the recreation on the property outside the mining area.

Require the developer to develop the open recreation on said property for the community before the mining starts.

Require the developer to develop the riding and biking trails before the mining starts and restore the property that's mined after mining is complete.

OFFICIAL RECORD
Clerk of the Board of Supervisors
County of San Diego

Exhibit No. B

Meeting Date: 09/10/2025 Agenda No. 06

Presented by: Brittany Waddell

PRESENTATION ON AIR QUALITY

Chair Lawson-Remer and Members of the Board

Zoning Ordinance 7358 Finding:

The operating characteristics of the proposed use is not compatible with adjacent uses and will have a harmful effect upon the existing neighborhood.

There are significant problems with the information the Applicant has presented on the health and safety risks associated with air quality as a result of sand mining in this location. Keep in mind the sand mining activity will be taking place only 100 feet from homes.

Silica is a result of any sand mine operation and will create severe health impacts on people and animals. According to the American Lung Association, silica dust caused by chipping, cutting, drilling, or grinding soil, granite, slate, sandstone or other natural materials can lead to chronic lung disease.

The San Diego County Air Pollution Control District (APCD) is mandated under federal and state law to regulate air pollutant emissions and improve air quality. In the letter from APCD dated February 25, 2022, it notes several problems with the analysis in the Final Environmental Impact Report (FEIR).

Compliance with "APCD Rule 50 Visible Emissions; APCD Rule 51 Nuisance" and APCD Rule 55, Fugitive Dust" is required by APCD.

Rule 50 states, "air contaminants shall not be discharged into the atmosphere for period or periods aggregating more that 3 minutes in any period of 60 consecutive minutes..."

Rule 51 states, "a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public..."

Rule 55 states, "Fugitive Dust Control. This rule has restrictions for airborne dust beyond the property line and visible roadway dust as a result of active operations spillage from transport trucks, erosion or track-carry-out."

The APCD letter further states, "...the District has received complaints in the past in regard to sand, rock and aggregate operations when in proximity to residences. Common factors which contribute to these complaints are proximity and elevation of a project in relation to residences, wind patterns, ...moisture content of haul roads and aggregate processing lines and piles."

In addition, the letter states that the Applicant's analysis has emission inconsistencies, a questionable dust control plan, and the calculations and assumptions of health risks are inconsistent with how APCD calculates health risk.

I urge your Board to NOT risk our health. Please protect our children, the elderly and all adults who live in the surrounding neighborhoods and deny this harmful project.

San Diego County
Air Pollution
Control District

February 25, 2022

Robert Hingtgen
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Dear Mr. Hingtgen,

The San Diego Air Pollution Control District (District) appreciates the opportunity to provide comments on the proposed project. General comments contained in this letter are for information/education of District rules and requirements and do not require a response. The District requests a response when specific comments are made that reference a section of the CEQA document.

Project Description as Described by the District

The Cottonwood Sand Mine Project (project) is located in the unincorporated portion of the County, in the Valle De Oro Community Planning Area. The Project proposes to convert the two golf courses within the Cottonwood Golf Club to a sand mining operation that would be conducted in three phases over 10 years. Approximately 214.4 acres of the approximately 280-acre site are proposed for extractive use.

General Information About the District

The District is mandated under federal and state law to regulate air pollutant emissions and improve air quality to protect public health and the environment. Accordingly, the District operates a countywide air quality permitting, monitoring, and enforcement programs to ensure compliance with applicable air pollution regulations for healthful air quality. The District's jurisdiction covers all of San Diego County, including both the incorporated and unincorporated areas.

Specific Comments on Emissions Estimates

The District reviewed emissions for Diesel Particulate Matter (DPM) and Particulate Matter (PM) by comparing the project details and assumptions used to create the CalEEMod output. These comments pertain to DPM, PM and other emissions stated in the DRAFT EIR:

- The emissions found on the Attachment tables and those found in the AQ section are not consistent, as some of the totals are different. The District suggests comparing these emissions and making them consistent.

10124 Old Grove Rd. San Diego California 92131-1649
(858) 586-2600 Fax (858) 586-2601
www.sdapcd.org

- The DRAFT EIR used District calculation procedures for the operational emissions, except for the unpaved haul roads – for those, the EIR used the 2006 version of AP-42 (The District uses the 1995 version due to the need to make moisture and other adjustments). Using the 2006 version of AP-42 tends to underestimate the haul road emissions by 2 to 3.5 times.
- The DRAFT EIR used a 95% control efficiency for watering the haul roads, but did not specify a watering frequency in the dust control plan. The District suggests adding a watering frequency that correlates to 95% (i.e. watering every 2 hours, unless the ground is wet).
- PM emissions are created using OFFROAD2017, although EMFAC 2021 was released in January 2021. The District does not believe recalculation of the emissions estimations is required, but including a discussion of why using OFFROAD2017 is still accurate would be appropriate.

Specific Comments on the Health Risk Assessment

The District also reviewed the health risk analysis conducted in the DRAFT EIR. Comments on the health risks:

- The risk calculations are based on a 10-year exposure, as the operation is assumed to run for 10 years only. This is not the practice used by the District in calculating health risks and will be inconsistent with the assumptions used in calculating health risks in District Rule 1200 HRA guidelines. This has the biggest impact on risk results compared to what is seen in AB2588 HRAs (which use 30 years, assuming the source will continue in the future). Based on the reported risk methodology in the DRAFT EIR, it is recommended that the HRA be adjusted to be more consistent with how the District calculates health risks as a result of facility emissions. Then the results can be compared to District Rule 1200 thresholds (again mainly due to the 10-year exposure instead of a normal 30-year exposure). It is also not the District's practice, nor does the District have authority, to put a sunset date on a permit indicating when the operation of a facility must end.
- The DRAFT EIR used CARB provided meteorological data for Gillespie Field. The District would have recommended the use of more recent data which the District has access to. Also, the District would have recommended to use the sigma theta data (not the modified Ustar that was previously used). However, this should not impact the resulting risk results.
- The DRAFT EIR did not give all the HARP model inputs (like deposition velocity), so the District is unable to verify all model inputs. However, the emissions input by source looks appropriate, and the cancer risk isopleth provided is what we would expect for the dispersion patterns in the area.

General Information About Equipment Potentially Requiring Permits

The District's permitting program has been established to minimize air pollution by specifying operating and compliance requirements for stationary and portable sources that emit air contaminants. District Rule 10 requires that any person building, erecting, altering or replacing any article, machine, equipment or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants, shall first obtain written authorization for such construction from the District. Examples of air contaminants include carbon monoxide, lead, nitrogen dioxide, ozone, particulate matter, sulfur dioxide or toxic air contaminants, which can negatively impact public health. District Rule 11 lists exemptions for equipment or processes that do not emit a significant amounts of air pollutants.

Specific Comment on Equipment Which May be Used

Rock crushing, blasting and some 2-engine vehicles may require authority to operate from the District.

General Information About Dust

Projects or operation that can generate fugitive dust emissions may be subject to the following APCD rules:

- APCD Rule 50 *Visible Emissions*, which states air contaminants shall not be discharged into the atmosphere for a period or periods aggregating more than three minutes in any period of 60 consecutive minutes which is darker in shade than a number 1 on the Ringlemann Chart (20% opacity).
- APCD Rule 51, *Nuisance*, which states "*a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property. The provisions of this rule do not apply to odors emanating from agricultural operations in the growing of crops or raising of fowls or animals.*"
  Please note the District has received complaints in the past in regard to sand, rock and aggregate operations when in proximity to residences. Common factors which contribute to these complaints are proximity and elevation of a project in relation to residences, wind patterns, air pollution controls or mitigations implemented and moisture content of haul roads and aggregate processing lines and piles.

In addition to the rules listed above, any commercial construction or demolition activity capable of generating fugitive dust emissions may be subject to District Rule 55, *Fugitive Dust Control*. This rule has restrictions for airborne dust beyond the property line and visible roadway dust as a result of active operations, spillage from transport trucks, erosion, or track-out/carry-out.

General Information About Off-Road Construction Equipment

Any project using off-road vehicles that are diesel-powered, self-propelled, and 25 horsepower or greater must be registered under the current owner with the California Air Resources Board (CARB) Diesel Off-Road Online Reporting System (DOORS). Each vehicle is assigned an Equipment Identification Number (EIN) which must be labeled on both sides of the vehicle. Fleets must meet emission targets.

Fleets must limit their unnecessary idling to 5 minutes; there are exceptions for vehicles that need to idle to perform work (such as a crane providing hydraulic power to the boom), vehicles being serviced, or in a queue waiting for work.

Written Idling Policy – Medium fleets (total max hp 2,501 – 5,000) and large fleets (total max hp greater than 5,000 hp) must also have a written idling policy that is made available to operators of the vehicles and informs them that idling is limited to 5 consecutive minutes or less.

General Information About Asbestos

Asbestos is a known human carcinogen and the primary route of exposure is through inhalation of asbestos fibers. More information on the health effects of asbestos may be found at www.epa.gov/asbestos . As such, APCD Rule 1206 incorporates the requirements of the federal asbestos requirements found in National Emission Standards for Hazardous Air Pollutants (NESHAP) and includes additional requirements to minimize exposure to asbestos fibers.

APCD Rule 1206 requires a facility survey for certain projects to determine if asbestos is present prior to commencement of renovation or demolition. Persons conducting facility surveys shall have taken and passed a current EPA-approved Building Inspector Course. The asbestos content shall be analyzed by a laboratory certified by the National Voluntary Laboratory Accreditation Program (NVLAP).

If more than 100 square feet of asbestos containing materials will be disturbed or a demolition will occur a notification must be submitted to the APCD and procedures for asbestos emission control and waste handling and disposal must be in compliance with District Rule 1206.

Specific Comment About Asbestos

The DRAFT EIR specifies the removal of all manmade structures. As stated in the general information about asbestos, "If more than 100 square feet of asbestos containing materials will be disturbed or a demolition will occur a notification must be submitted to the APCD and procedures for asbestos emission control and waste handling and disposal must be in compliance with District Rule 1206."

Should you have any questions about these comments or District requirements please contact Air Quality Specialist, Eric Luther (858) 586-2806 or eric.luther@sdapcd.org .

Sincerely,

Eric Luther

Eric Luther
Air Quality Specialist

OFFICIAL RECORD
Clerk of the Board of Supervisors
County of San Diego

Exhibit No. C

Meeting Date: 09/10/2025 Agenda No. 06

Presented by: Jösan Feathers

#6

Dear Members of the Board,

As a Registered Civil Engineer, I know the MUP findings cannot be made. The FEIR did NOT present a feasible alternative—manufactured sand, an authorized sand aggregate in California's Standard Specifications for Public Works. Fly ash eliminates the need for sand entirely. Recycled concrete can be processed into M-sand. Its use does NOT preclude the use of construction workers or union members.

Excavation 40 feet below grade of 79 acres downstream and 100 acres upstream of Steel Canyon Road Bridge can undermine the abutments and footings of a bridge used to access a nearby elementary school. River sand extraction has caused *bridge collapses* in Taiwan, Portugal, and India, *killing* almost one hundred people, with millions of dollars of infrastructure damage.

In ten years, the County will be forced to maintain and assume liability for the proposed 620 feet long and 20 feet high grouted riprap control structure in perpetuity in this age of climate change and unpredictable flooding.

which they purposely failed to show in their presentation!!!

Please DENY this project.

Sincerely,

Jösan Feathers, P.E.

Ms. Jösan Feathers, P.E.

[redacted]

OFFICIAL RECORD
Clerk of the Board of Supervisors
County of San Diego

Exhibit No. D

Meeting Date: 09/10/2025 Agenda No. 06

Presented by: Brian Davis

Will the county of san diego be liable if there are increased cas

Sign in

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AI Overview

The question of San Diego County's liability for increased Valley Fever cases after approving the Cottonwood Sand Mine is complex and depends on several factors.

Firstly, it's crucial to understand that Valley Fever is caused by inhaling spores of the Coccidioides fungus, which naturally occurs in the soil of certain arid regions, including parts of San Diego County. While sand mining activities involve disturbing soil, and thus could potentially increase airborne dust containing these spores, the specific conditions at the Cottonwood site are relevant. The Valley Fever Report for the Cottonwood Sand Mining Project stated that the project site has been a golf course and subjected to irrigation and pesticides, making the presence of the fungus unlikely>>.

However, the report also acknowledges that since the risk of potential exposure cannot be entirely eliminated, the project will implement measures to reduce dust and provide information and training for onsite workers.

Potential avenues for liability:

- Negligence: Liability could arise if the County approved the mine without properly assessing and mitigating the potential for increased Valley Fever cases, and if it could be proven that their actions directly caused an increase in infections.
- Failure to Implement Mitigation Measures: If mitigation measures required for the mine were not properly implemented or enforced, it could lead to potential liability.
- Environmental Impact Report (EIR) Adequacy: The EIR process, which informs decision-makers of significant project effects, could be a factor in a legal challenge if it did not adequately address the potential for Valley Fever.

Successfully proving causation in a Valley Fever case is challenging because the disease is endemic in the area and individuals can be exposed from various sources. Establishing a direct link between the mine's activities and increased infections would likely be required.

Ultimately, San Diego County's potential liability would depend on the specific facts, evidence, and legal interpretation by the courts.

spores spread up to 75 miles

Valley Fever Report for the Cottonwood Sand Mining Project

pdf). ... The project site is in San Diego County which is a suspected endemic region for Coccidioides spores and has climatic conditions suitable for hosting t...

County of San Diego (.gov)



Valley Fever Prevention - CDPH - CA.gov

Jun 25, 2024 — Valley Fever. ... Valley fever is caused by breathing in a fungus from dirt and dust in outdoor air, and it can be difficult to avoid breathing in dust....

CDPH (.gov)



Cottonwood Sand Mine DEIR - County of San Diego

Issues to be Resolved by the Decision-Making Body An EIR is an informational document intended to inform the public agency decision makers and the public of the...

County of San Diego (.gov)

Valley fever costs mount for patients and taxpayers

KVPR | By Rebecca Plevin and Kellie Schmitt, Reporting on Health Collaborative

Published September 22, 2012 at 6:05 AM PDT

Berenice Parra was sick for eight months before doctors realized she had a severe form of the fungal disease valley fever.

"I was literally dying without a cure," said Parra, a 25-year-old mother of three from Arvin, in Kern County.

Desperate for relief and concerned that doctors in the Bakersfield area weren't taking her illness seriously, she drove 245 miles to Tijuana, three times, to see a doctor recommended by relatives.

Her health insurance wouldn't cover those visits, so she paid out of pocket about $2,000.

Parra and her husband missed so much work that the family sank into debt.

With valley fever cases soaring in the southwest, more and more people's lives and finances are being upended. Misdiagnosis of the disease adds to the costs for doctor's visits, hospitalizations and long-term treatment with drugs. At more than $100,000 for a typical hospital stay, valley fever, on average, is more costly to treat than any of California's 25 most common conditions requiring hospitalization, according to a state

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Hidden Brain
KVPR
Hidden Brain

By comparison, septicemia, a serious-life threatening blood infection more widely known among clinicians, has an average charge per stay of $72,174, and an average length of hospital stay of 7.1 days, according to the health planning office.

Behind those numbers are families and communities that have been devastated by valley fever.

Parra's 9-year-old daughter, Ilene Jiménez, typed a text message to her mom: "I feel so bad for my mom I just wish I could turn to an angel and help her with valley fever ☹ ☹!!!!"

Out of work for weeks

When people are stricken with valley fever, it can have an enormous impact on their ability to work. Parra eventually had to quit her job picking and packing grapes, and her husband missed long stretches of work while caring for her.

People miss a median of 14 work days – or about three weeks of work – due to valley fever, according to a study by the Arizona Department of Health Services and published in Emerging Infectious Diseases in 2010.

The study of 493 people found a median of 47 days of decreased activities, and a median of 120 days – or four months – of symptoms. In comparison, people are sick with the flu for about one week, said Clarisse Tsang, acting infectious disease epidemiology program manager at the Arizona Department of Health Services and lead author of the report.

"It is something that doesn't just go away," Tsang said. "It prevents people from doing their normal daily activities."

In the City of Coalinga, located in a part of Fresno County where the fungus that causes valley fever is common, an estimated five employees out of 97 – or about 5 percent of the total staff - miss work to recover from valley fever every year or to take care of a sick relative, according to Marissa Chávez, city human resources director.

"I would say it's a major expense and also a hardship, because employees are missing work," she said.

Taxpayers on the hook

Parra was too sick and weak to work for full year after she was diagnosed with valley fever.

With so much income lost, Parra and her husband applied for government help. Parra said she didn't like being a burden on anyone, but she felt like she didn't have a choice.

Through the federal Supplemental Nutrition Assistance Program, they received $250 each month for about one year, Parra said. During that time, she also received $50 disability payments every two weeks, and Medi-Cal assistance.

Local and state governments are often on the hook for valley fever – whether it means more people relying on the safety net for support or paying hefty workers' compensation claims to government employees who became ill on the job.

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programs, was more than $1.1 billion between 2000 and 2010, according to preliminary data from the California Department of Public Health.

Those are just the costs tied directly to an accurate diagnosis of the disease. Given that an estimated 150,000 people suffer from valley fever every year but fewer than 15,000 are diagnosed, the cost to taxpayers likely is much higher. No one knows how much is spent on unnecessary tests, treatments and hospital stays for valley fever cases that are misdiagnosed, such as Parra's.

Frequent misdiagnoses can make it difficult for government agencies and private employers to determine the true cost of workers' compensation costs due to valley fever, too. An employee's claim could be reported as a lung injury, without specifying if the injury was caused by smoke inhalation or by the fungus that causes valley fever. But in instances where valley fever is determined to be the source of a workers' compensation claim, the price tag can range from a couple hundred dollars, with no missed work, to thousands of dollars, and months of leave.

In the past five years, Kern County has paid a valley fever-related claim of about $260,000 to a firefighter, who also missed 678 days of work – or close to two years.

The county also paid about $85,000 to a parks maintenance worker, whose lungs were injured as a result of valley fever. The employee died from lung disease or complications from a lung transplant, according to county spokesman Allan Krauter. If job-related valley fever is determined to have been a contributing cause of his death, the county might be required to pay a death benefit to his survivors, Krauter said.

The city of Bakersfield has paid more than $8 million in workers' compensation claims related to valley fever since 2000. That total includes both the amount paid on a claim and estimated future liabilities, said city risk manager Jena L. Covey.

One claim – of more than $7.1 million – accounts for a bulk of that cost. The average cost of the other 20 workers' compensation claims is about $61,000.

In 2005, a Coalinga correctional officer acquired valley fever, which resulted in meningitis and eventually permanent disability. That claim, plus the resulting settlement, cost that city more than $1 million, which would have more than covered the cost to replace a 25-year-old fire truck on its last legs.

'We had so many plans'

A year and a half after her valley fever diagnosis, Parra's health is recovering, but her family's financial situation remains uncertain.

She works as a teacher's assistant, but she doesn't have the energy she once had.

"My fatigue level hasn't decreased at all," she said. "I have to call into work often because I can't get off the bed, and I'm too tired to go to work."

She had intended to begin taking courses at Bakersfield College in fall 2010 but had to delay starting until a few weeks ago. Her family had been preparing to buy a house but no longer has the resources.

And then there are the credit card bills. Parra thinks it may take years to climb out of

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Google COST TO TREAT VALLEY FEVER IN PEOPLE IN SAN DIEGO Sign in

AI Mode All Images News Short videos Forums Shopping More Tools

AI Overview

The cost to treat Valley Fever in San Diego, while not specific to the city, can range from minimal for mild cases to over $100,000 for severe, hospitalized cases. Treatment costs include doctor's visits, diagnostic tests like X-rays and CT scans, and antifungal medications such as fluconazole, which can cost thousands of dollars over months or years for treatment of more serious or disseminated infections. Hospitalizations account for the largest portion of direct costs in severe cases.

Prevalence and Cost Burden of Coccidioidomycosis Infection ...
Mar 28, 2019
PubMed Central

Valley fever - Diagnosis & treatment - Mayo Clinic



Show more

National Institutes of Health (NIH) | (.gov)
https://pmc.ncbi.nlm.nih.gov › articles › PMC6480346

The Rise of Valley Fever: Prevalence and Cost Burden ...

by L Wilson · 2019 · Cited by 62 — Per person direct **costs** were highest for disseminated **disease** ($1,023,730), while per person direct **costs** were lowest for uncomplicated CM ...
Missing: ~~PEOPLE~~ | Show results with: PEOPLE

People also ask

How much does Valley fever treatment cost?

The average lifetime direct costs across all 5 Valley fever manifestations is $64 800 per person diagnosed in Arizona in 2019 and $6300 for indirect costs. Of the 5 disease manifestations, disseminated infection has the highest economic burden at $1.26 million direct and $137 400 indirect costs per person.

National Institutes of Health (NIH) | (.gov)
https://pmc.ncbi.nlm.nih.gov › articles › PMC7863867

Clinical and Economic Burden of Valley Fever in Arizona

How long is the treatment for Valley fever?

Can you get disability if you have Valley fever?

Can you be hospitalized for Valley fever?

What kills the Valley fever fungus?

Antifungal medications

The antifungal drugs fluconazole (Diflucan) or itraconazole (Sporanox, Tolsura) are generally used for all but the most serious forms of coccidioidomycosis disease. All antifungals can have serious side effects. But these side effects usually go away once the medication is stopped.

Coccidioides in Steele Canyon Sand Mine area San Diego

A potential for *Coccidioides* exposure, the fungus that causes Valley Fever, is a significant concern near the Steele Canyon Sand Mine area in San Diego due to ongoing mining activities. Sand and soil disturbances, especially in dry conditions, can release fungal spores into the air.

Risk factors in the Steele Canyon area

- **Active sand mining:** The proposed Cottonwood Sand Mine project, near the Steele Canyon area, has prompted a formal Valley Fever report from San Diego County. Disturbances from mining operations, including the use of conveyor belts and increased truck trips, stir up soil and release airborne fungal spores.
- **Dry, dusty soil:** San Diego County is in an endemic region for *Coccidioides* fungus, which thrives in arid soil in the Southwestern U.S. and California's Central Valley.
- **Drought conditions:** A 2024 study from UC San Diego linked California's droughts to an increase in Valley Fever cases. Drier soil makes it easier for the fungus to become airborne when disturbed.
- **Increased cases in San Diego:** San Diego County has observed a rising trend of Valley Fever cases in recent years, mirroring an increase throughout California.

Preventing exposure to *Coccidioides*

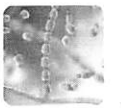
- **Limit exposure to dust:** When possible, reduce outdoor activities in dusty areas, especially during windy days or near active soil disturbance.
- **Mitigate dust at the source:** Wetting soil before it is disturbed can reduce the amount of dust released into the air.
- **Wear a respirator:** An N95 mask can help filter out fungal spores and other harmful particles from the air.
- **Workplace safety:** Workers involved in construction, archaeology, and other occupations that disturb soil are at particularly high risk and should take precautions.
- **Be aware of symptoms:** Be mindful of symptoms like fatigue, cough, and shortness of breath that appear one to three weeks after potential exposure. While most cases resolve on their own, a small percentage can become severe. Seek medical attention if symptoms develop.



10 sites

"FINAL" Minutes JDCPG 8:15:23 - County of San Diego
Aug 15, 2023 — This mining operation is all about cumulative effects. Considered in isolation the...
County of San Diego (.gov)

Coccidioidomycosis (Valley Fever) - County of San Diego
Sep 19, 2024 — People can get Valley Fever by breathing in dust from...
County of San Diego (.gov)



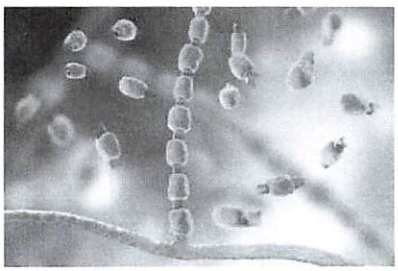
Monthly Communicable Disease Report - County of San Diego
Jun 15, 2021 — San Diego County, 2016-2020 About 40% of acute cas...
County of San Diego (.gov)

Show all

Health & Human Services Agency

Coccidioidomycosis (Valley Fever)

Page originally published 9/19/2024.



Coccidioidomycosis, also known as "Valley Fever" or "Cocci", is a lung infection. Valley Fever is caused by *Coccidioides*, a fungus found in the soil. This fungus can be found in the Pacific Northwest and southwestern United States, and parts of Mexico, Central America, and South America. In California, the number of reported Valley Fever cases have greatly increased in recent years.

See below, or click the following links, to learn more about:

- **Prevention**
- **Transmission (spread)**
- **Symptoms**
- **Diagnosis and Treatment**
- **Resources**

Prevention

There is no vaccine to prevent Valley Fever. It can be difficult to avoid breathing in *Coccidioides* fungus in **areas where it lives** in the environment. However, there are still ways to reduce exposure and infection, including:

- Avoid dust outside in places where Valley Fever is common, as well as dusty areas outside, like construction or excavation sites.
  - If this is not possible, wear a fitted N95 respirator.
  - Avoid digging, gardening, or yard work in these areas.
  - Use vacuums with HEPA air filters to clean contaminated equipment or surfaces.
  - Keep break areas at workplaces clean and free of dust.
- Stay inside and keepwindows and doors closed when it is windy outside and the air is dusty, especially during dust storms.
- While driving in areas where Valley Fever is common, keep car windows closed and use recirculating air, if available.
- Consider avoiding outdoor activities that involve close contact with dirt or dust, including yard work and digging, especially if you are in one of the groups at **higher risk** for getting Valley Fever, or getting very sick from Valley Fever.
- Use soil stabilizers or cover open dirt areas around your home with grass, plants, or other ground cover (like gravel or wood chips) to help reduce dusty, open areas.
- Use **air filtration** measures indoors, such as using portable HEPA cleaners, and change your filters often.
- Clean skin injuries well with soap and water to prevent infection.

Certain jobs and work activities put workers at risk for Valley Fever. See **Valley Fever Prevention for Workers** for more information, including where Valley Fever is found, who is at increased risk, and preventing exposure.

Transmission (Spread)

People can get Valley Fever by breathing in dust from outdoor air that contains spores of *Coccidioides* fungus that grows in the soil.

- When soil or dirt is stirred up by strong winds or while digging, dust containing these fungus spores can get into the air.
- Anyone who lives, works, or travels in an area where the Valley Fever fungus grows can breathe in these fungus spores from outdoor dust without knowing it and become infected.
  - In rare cases, spores can enter through a cut, wound, or splinter and cause a skin infection.
- Animals, including pets, can also get Valley Fever by breathing in fungus spores from dirt and outdoor dust.

Valley Fever is not contagious, meaning it cannot spread from one person, or animal, to another.

Symptoms

Many people who are exposed to *Coccidioides* do not get Valley Fever. Most people who are infected with Valley Fever have no symptoms and their bodies will fight off the infection naturally. Symptoms include:



- Fatigue (tiredness),



- Shortness of breath,



- Cough,



- Night sweats,



- Fever,



- Muscle aches or joint pain, and/or



- Headache,



- Rash on upper body or legs.

Symptoms of Valley Fever may appear between 1-3 weeks after a person breathes in the fungal spores. with symptoms usually lasting a few weeks to a few months. Some patients have symptoms that last longer than this, especially if the infection becomes severe.

With severe infections:

- Approximately 5-10% of people who get Valley Fever will develop serious or long-term problems in their lungs.
- In about 1% of people, the infection spreads from the lungs to other parts of the body, such as the central nervous system (brain and spinal cord), skin, or bones and joints.

If symptoms last for more than a week, contact your healthcare provider.

Diagnosis and Treatment

The symptoms of Valley Fever are similar to other respiratory diseases, including COVID-19, flu, and pneumonia caused by bacteria. Laboratory tests are needed to know whether symptoms are caused by Valley Fever (which is caused by a fungus) or a respiratory disease (caused by a virus).

If you are being checked for Valley Fever, your healthcare provider may:

- Collect a blood sample and send it to a laboratory.
- Do an imaging test, like an x-ray or CT scan, of your lungs.
- Collect and test fluid from your respiratory tract or a biopsy.
- Do a skin test (similar to a skin test for tuberculosis).

Many people who get sick with Valley Fever have mild symptoms. They often get better without medication within a few months.

For people with more serious infections, or **risk factors for getting very sick**, a healthcare provider may prescribe 3-6 months of oral antifungal medication. People may need antifungal treatment if they have severe lung infection, or if the infection has spread to other parts of the body. These people may need to be hospitalized and the course of treatment is usually longer than 6 months.

Resources

Educational Materials

- **Fact Sheet**
- **Groups at Risk Flyer**
- **Valley Fever Awareness Poster**
- **Valley Fever Prevention Wallet Card**

County of San Diego

- **Monthly Communicable Disease Report - May 2021**
- **Monthly Communicable Disease Report - July 2024**

California Department of Public Health (CDPH)

- **Coccidioidomycosis (Valley Fever)**
  - **Frequently Asked Questions**

- **Valley Fever in California Dashboards**
- **Valley Fever Information for Health Professionals**
- **Valley Fever Data and Publications**

Centers for Disease Control and Prevention (CDC)

- **Valley Fever (Coccidioidomycosis)**
- **Clinical Overview of Vally Fever**

Workplace Resources

- **CDPH Occupational Health**
- **CDPH Work-Related Fact Sheet**
- **Cal/OSHA Valley Fever**

For more information, contact the Epidemiology Unit at (619) 692-8499 or send us an e-mail.

OFFICIAL RECORD
Clerk of the Board of Supervisors
County of San Diego

Exhibit No. E

Meeting Date: 09/10/2025 Agenda No. 06

Presented by: Alonso Gonzalez

SAN DIEGO HOUSING COALITION

September 9, 2025

Board of Supervisors
County of San Diego
1600 Pacific Highway, Room 310
San Diego, CA 92101

Re: Item 6 – Appeal of the Cottonwood Sand Mine (Sept. 10 Land Use Session) — Opposition

Honorable Chair and Supervisors:

On behalf of the San Diego Housing Coalition, I urge you to deny the appeal for the Cottonwood Sand Mine (Item 6) at your September 10, 2025 Land Use session. The Planning Commission has already voted to deny the Major Use Permit and Reclamation Plan; the applicant now seeks reversal.

Our coalition advances policies and projects that increase safe, healthy, and affordable homes across the region. The Cottonwood site—an aging golf course embedded in existing neighborhoods along Willow Glen Drive—should, if redeveloped, be planned for housing and community uses, not a decade of industrial extraction that worsens health, safety, and climate outcomes.

Public health concerns must be front and center. The record acknowledges risks from respirable crystalline silica associated with sand mining, including silicosis, lung cancer, COPD, kidney disease, and other harms, along with trace toxic metals in dust. Siting these emissions amid dense neighborhoods is inconsistent with your health-protection goals.

The project also creates serious traffic hazards. Heavy haul trucks would be placed onto Willow Glen and Jamacha corridors already under stress. Dozens of daily truck trips, along with proposed mining hours that overlap with school and commuting schedules, pose new risks for families who rely on these roads.

The site borders the Sweetwater River riparian corridor, habitat for the federally and state-listed endangered Least Bell's Vireo. Mining disturbance, noise, and dust adjacent to this sensitive habitat could undermine decades of recovery work and harm a species that remains imperiled.

Tribal sovereignty is sacrosanct. The record shows Native American cultural sites within the project area, including the possibility of sacred sites and human remains. The Sycuan Band of the Kumeyaay Nation submitted comments stressing the importance of protecting tribal cultural resources and burial grounds. The County has a duty to avoid damaging effects to tribal cultural resources when feasible, and in this case avoidance means saying no.

Beyond these points, the project raises concerns about climate change, water quality, hazardous materials, noise, vibration, and community character. All of these impacts are at odds with the County's commitments to environmental justice, safety, and climate action.

If this property is to be repurposed, the County should lead a community-driven process that evaluates infill housing, neighborhood-serving open space, and river-sensitive restoration—uses that add homes and reduce vehicle miles traveled instead of intensifying truck traffic and industrial emissions in a residential area.

For these reasons, the San Diego Housing Coalition respectfully urges a vote to deny the appeal and uphold the Planning Commission's denial.

Thank you for your consideration and for honoring the health, safety, housing, environmental, and tribal-cultural priorities of the Valle de Oro community.

Respectfully,

Alonso González
Acting Director
San Diego Housing Coalition

Alonso Gonzalez

OFFICIAL RECORD
Clerk of the Board of Supervisors
County of San Diego

Exhibit No. F

Meeting Date: 09/10/2025 Agenda No. 06

Presented by: Teri Davies-Storm

#6

TERI DAVIES-STORM
[redacted]

Dear Board Of Supervisors,

I live in the Cottonwood Development of Rancho San Diego and have lived here 39 years this past June. I raised my children in Rancho San Diego. We chose this area because it was rural, away from city and industry. We love nature. The Cottonwood/Sweetwater Valley is visible from our backyard. This was our most important selling feature. We love having the opportunity to look at the beautiful valley each morning.

The Cottonwood valley, which is surrounded by multi-million dollar homes, was zoned as recreational. Everyone who bought in this area believed that this area would either remain a golf course, park or at least open space with hiking trails. No one ever imagined the possibility of a sand mine one day occupying this area. You would be hard pressed to find any resident in this area agree that a sand mine would be a fitting industry for this area. If you have never had the opportunity, I encourage you to drive to the top of Windriver Drive and view this beautiful valley. It is one of the most beautiful valleys in all of San Diego County. It should remain so. In addition, Willow Glen Drive which borders the proposed Sand Mine area is designated as a scenic byway

I have a love and appreciation of the Native American culture. The Kumeyaay Natives inhabited this Cottonwood Valley long before Spanish Colonization. This area is a sacred area to the Kumeyaay of today, who's ancestors occupied this territory. To dig into this earth, in a sand mine operation, would not only be destructive to the environment and habitats of this valley including many endangered animal species and birds, it would be disrespectful and offensive to our Kumeyaay neighbors and friends. Greg Brown of New West Investment group and Cottonwood Cajon Es. LLC have the primary goal of making money out of the sale of the resources extracted from this land without regard to the damages this would cause to the environment, people, surrounding homes, property values, and Kumeyaay traditions. Using a quote from Native American proverbs warns about the consequences of environmental destruction and the importance of valuing natural resources over material wealth. "When the last tree has died, the last river has been poisoned, the last fish has been caught-we will realize we cannot eat money". For the sake of our environment, neighbors, neighborhoods and Kumeyaay traditions, I plead with you to vote against this sand mine project!

Best regards,
Teri Davies-Storm

OFFICIAL RECORD
Clerk of the Board of Supervisors
County of San Diego

Exhibit No. G

Meeting Date: 09/10/2025 Agenda No. 06

Presented by: Elizabeth Urquhart, Dianne Jacob, Brian Lorenz, Barry Jantz

BOARD OF SUPERVISORS MEETING
SEPTEMBER 10, 2025
AGENDA ITEM 6

Stop Cottonwood Sand Mine Organization

Speakers

Elizabeth Urquhart, President

Dianne Jacob

Brian Lorenz

Barry Jantz

Board of Supervisors Presentation by Elizabeth Urquhart
September 10, 2025
Cottonwood Sand Mine Major Use Permit

Chair Lawson-Remer and Members of the Board,

My name is Elizabeth Urquhart, President of the "Stop Cottonwood Sand Mine" organization.

We are here this morning representing thousands of people who since 2018 have been fighting against this sand mine which, if approved, would be right in the middle of an established residential area.

To begin a short history of this property.

For over 60 years, this property has been in an outdoor recreational use. For decades the County General Plan and Valle de Oro Community Plan have designated this property as Open Space/Recreation... a designation that applies to large, existing recreational uses such as parks, athletic fields, playgrounds, hiking trails, and biological and wildlife resources , not a sand mine.

We ask that you join thousands of residents, the Sycuan Band of Kumeyaay Nation, Sierra Club, 3 Community Planning Groups, Community Organizations, The San Miguel Fire Protection District, County Planning Staff and the Planning Commission in denying the appeal and denying this project.

Dianne...

Board of Supervisors Presentation by Dianne Jacob
September 10, 2025
Agenda Item 6
Cottonwood Sand Mine Major Use Permit

My name is Dianne Jacob.

As a former County Planning Commissioner and member of the Board of Supervisors, I have been a part of many land use hearings. In my decades of experience, I have never seen such a destructive project with such negative impacts on the people who live in a community.

The Applicant wants you to believe that "there is now only one active sand mine within the County".

The fact is there are currently six active sand mines within the County that produce sand for concrete!

(map of quarries with red smiley faces)

And, according to the most current California Geological Survey, Department of Conservation; there are 9 undeveloped locations with one additional location in the permitting process, for a total of almost 2,500 acres with PCC-Grade Sand potential. (see graphic w/list)

In addition, the Applicant argues that there is a need for PCC grade sand; construction costs will be lower; housing will be more affordable; $2.5 million in sales tax revenue; and a "gift" of open space, which is exactly what we already have guaranteed in the County General Plan!

The fact is there is no evidence to support these arguments AND...

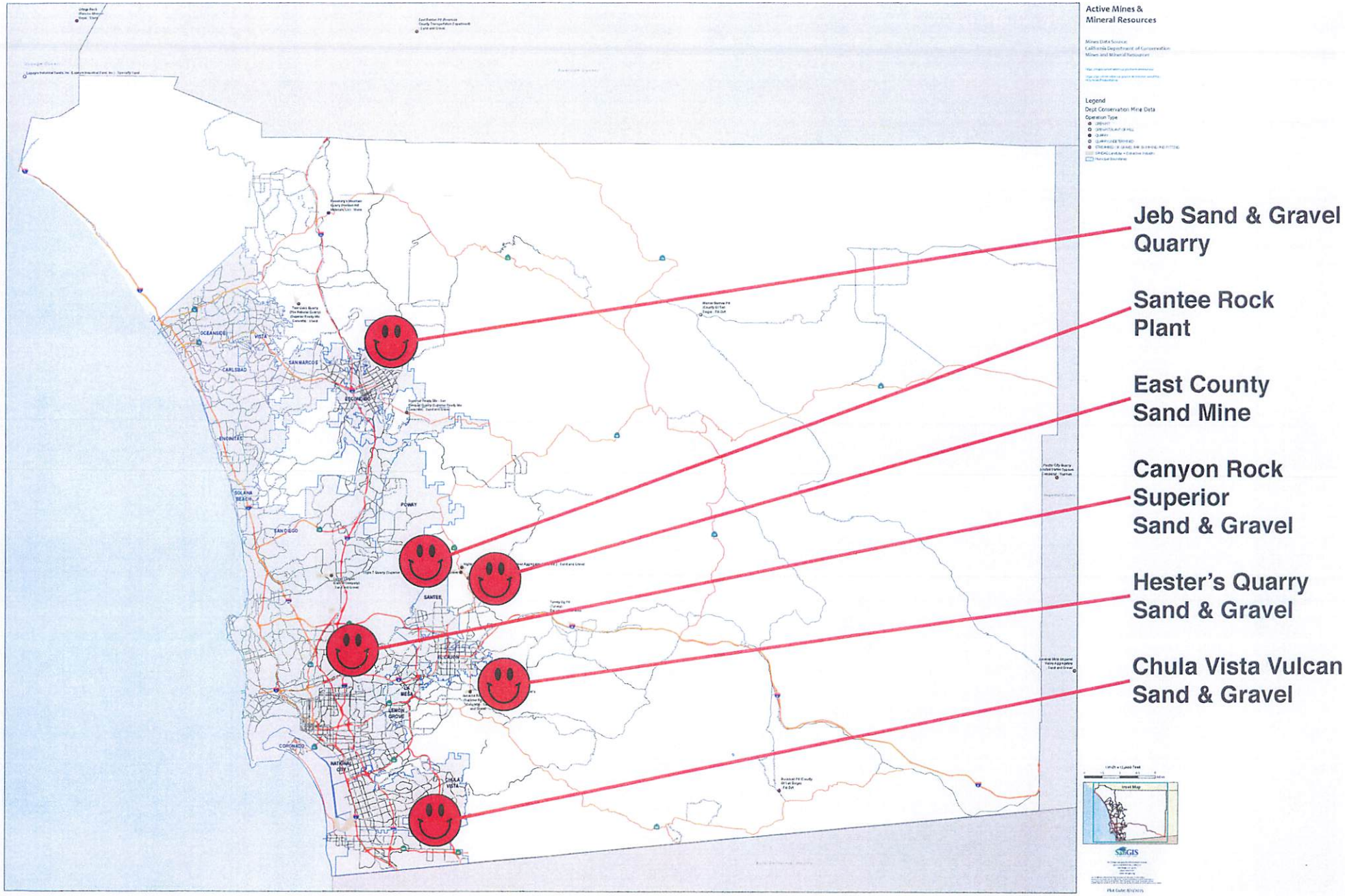
NONE of these arguments matter because NONE of these arguments relate to the required legal findings the Board must make to approve this project.

County staff has correctly concluded that two of the legal findings in Zoning Ordinance Section 7358 cannot be made; harmful effect on neighborhood character and suitability of the site for the type and intensity of the use proposed.

In addition, the Zoning Ordinance states, "before any use permit MAY be granted, it shall be found that the location, size, design and operating characteristics of the proposed use will be COMPATIBLE with adjacent uses, residents, building or structures..."

The key word here is COMPATIBLE which refers to the ability of two or more things to exist together without problems or conflict. In other words, capable of existing together in harmony.

Brian and Barry will provide evidence why a sand mine is NOT COMPATIBLE in any way with the adjacent uses.


Active Mines &
Mineral Resources
Legend
Dept Conservation Mine Data
Operation Type
Jeb Sand & Gravel
Quarry
Santee Rock
Plant
East County
Sand Mine
Canyon Rock
Superior
Sand & Gravel
Hester's Quarry
Sand & Gravel
Chula Vista Vulcan
Sand & Gravel
OCEANSIDE
VISTA
CARLSBAD
SAN MARCOS
ESCONDIDO
ENCINITAS
SOLANA BEACH
POWAY
SAN DIEGO
SANTEE
EL CAJON
LA MESA
LEMON GROVE
CORONADO
NATIONAL CITY
CHULA VISTA

ACTIVE SAND MINING OPERATIONS IN SAN DIEGO COUNTY PRODUCING SAND FOR CONCRETE

Hester's/Robertson's Quarry
2094 Willow Glen Drive; El Cajon, CA 92019

Chula Vista Quarry
2275 Hardrock Road; Chula Vista, CA

Canyon Rock Quarry
7500 Mission Gorge Road; San Diego, CA 92120

East County Sand Mine
12152 Morena Avenue; Lakeside, CA 92040

Jeb Sand & Gravel Quarry
25125 Lake Wohlford Road; Escondido, CA

Santee Rock Plant
8514 Mast Blvd. Santee, CA

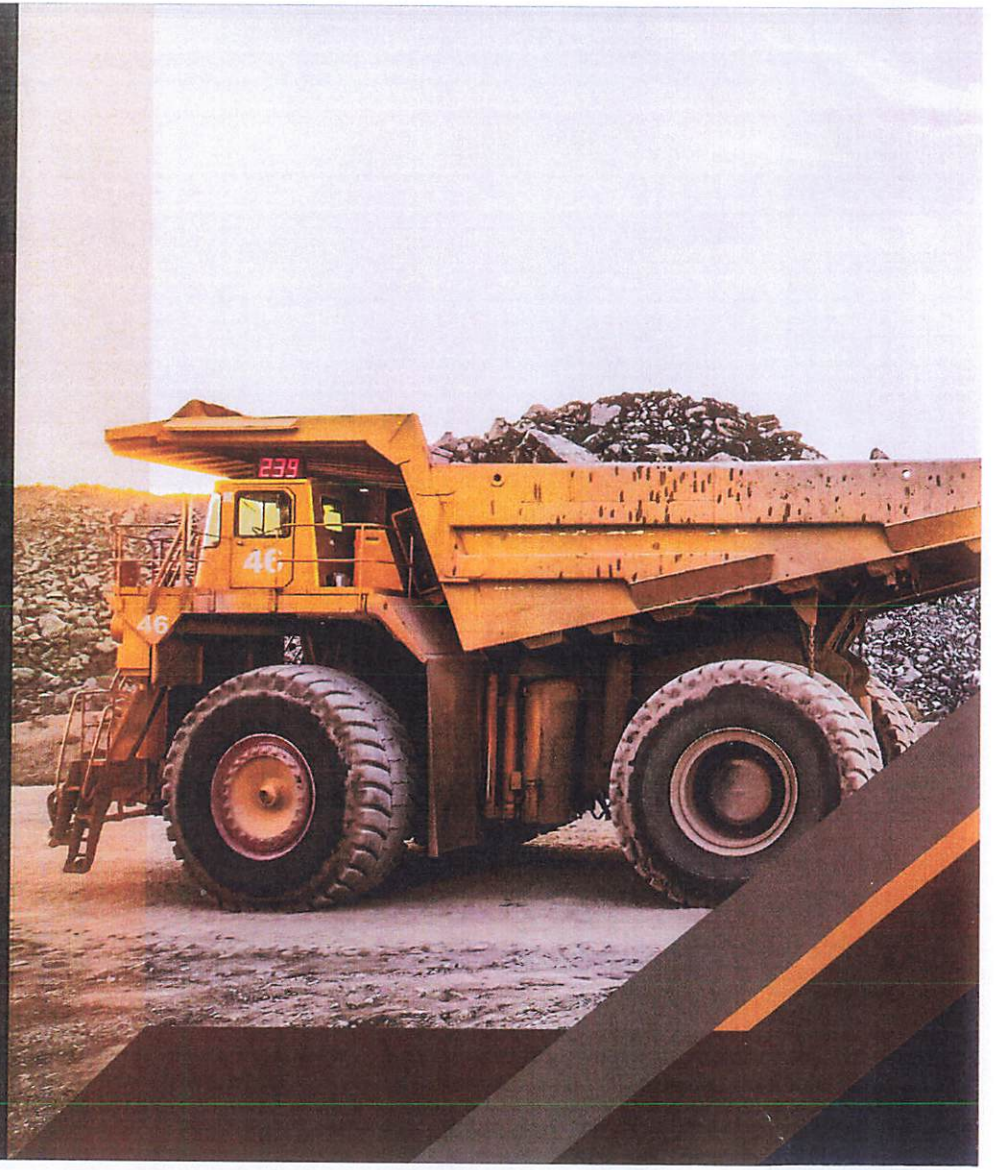
CONCLUSION:

Contrary to what the Applicant wants you to believe there are six, not one, active sand mines in San Diego County that produce sand for concrete.

10 ALTERNATIVE SITES

2,472 UNDEVELOPED ACRES WITH PCC-GRADE SAND POTENTIAL

Sycamore Ridge (482 acres)
Rosemary's Mountain Quarry (78 acres)
San Marcos Quarry area (544 acres)
TTT Quarry (36 acres)
San Vincente Creek area (696 acres)
Hester's Granite Quarry (112 acres)
Part of Dehesa Valley (196 acres)
Jamacha Rock Quarry (65 acres)
Jamul Quarry (158 acres)
Otay Hills Quarry (105 acres) - currently in the permitting stage



PORTLAND CEMENT CONCRETE-GRADE AGGREGATE SITES IN THE WESTERN SAN DIEGO COUNTY

According to the report, "Update of Mineral Land Classification of PCC-Grade Aggregate in the Western San Diego County P-C Region, there are nine sites designated MRZ-2 in addition to the Cottonwood Golf Course Property.

This MRZ-2 zone applies to areas where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists and where there is adequate data demonstrating that the likelihood for occurrence of significant mineral deposits is high for PCC-Grade Sand.

Sycamore Ridge Property (482 acres)
Rosemary's Mountain Quarry Property (78 acres)
San Marcos Quarry area (544 acres)
TTT Quarry (36 acres)
San Vicente Creek area (696 acres)
Hester's Granite Quarry (112 acres)
A part of Dehesa Valley (196 acres)
Jamacha Rock Quarry (65 acres)
Jamul Quarry (158 acres)

Source: California Geological Survey Report; California Department of Conservation 2017

Otay Hills Quarry (105 acres); is currently in the permitting stage.

Including the Otay Hills Quarry, there are ten alternative sites which total almost 2,500 acres of undeveloped land with the potential of producing PCC-grade sand.

SPECIAL REPORT 240

UPDATE OF MINERAL LAND CLASSIFICATION: PORTLAND CEMENT CONCRETE-GRADE AGGREGATE IN THE WESTERN SAN DIEGO COUNTY PRODUCTION-CONSUMPTION REGION, CALIFORNIA

2017



CALIFORNIA GEOLOGICAL SURVEY
Department of Conservation

STATE OF CALIFORNIA
EDMUND G. BROWN JR.
GOVERNOR

THE NATURAL RESOURCES AGENCY
JOHN LAIRD
SECRETARY FOR RESOURCES

DEPARTMENT OF CONSERVATION
DAVID BUNN
DIRECTOR

Areas within the P-C Region Reclassified to MRZ-2 for PCC-Grade Aggregate from MRZ-3 or MRZ-4 in OFR 96-04

The first update report for the Western San Diego County P-C Region (Miller, 1996) reclassified several areas within the P-C Region from MRZ-3 or MRZ-4 to MRZ-2 for PCC-grade aggregate. These include:

- San Marcos Quarry area (MRZ-3 to MRZ-2, 544 acres),
- TTT Quarry (MRZ-3 to MRZ-2, 36 acres),
- San Vicente Creek area (MRZ-4 to MRZ-2, 696 acres),
- Hester's Granite Quarry (MRZ-3 to MRZ-2, 112 acres),
- A part of Dehesa Valley (MRZ-4 to MRZ-2, 196 acres), and
- Sycamore Ridge Property (482 acres previously reclassified to MRZ -2 by petition).

Areas Outside the P-C Region Classified MRZ-2 in OFR 96-04

OFR 96-04 also classified two areas outside of the Western San Diego County P-C Region boundary as MRZ-2:

- The previously mentioned Rosemary's Mountain/Pankey Ranch site (adjacent to the P-C Region at the San Luis Rey River [78 acres] had previously been classified MRZ-2 for "Mixed Aggregate" by petition), and
- The Jamul Quarry (3 miles east of the P-C Region [158 acres] was classified MRZ-2 for PCC-grade aggregate.

Area Reclassified to MRZ-2 from MRZ-3 in this Update Report

In this update report, one area in the Western San Diego County P-C Region is reclassified to MRZ-2 for PCC-grade aggregate from MRZ-3:

Jamacha Rock Quarry: Approximately 65 acres, two miles south of El Cajon and two miles east of Casa de Oro, are reclassified to MRZ-2 (PCC) from MRZ-3. Here, quartz-diorite and gabbro are mined to produce decomposed granite, fill, and crushed rock aggregate. Mining, which began in the 1940s, originally produced decomposed granite; more recently, unweathered rock suitable for use as crushed rock aggregate of PCC-grade has been exposed.

Area Reclassified to MRZ-2 from MRZ-1 and MRZ-3 in this Update Report

In this update report one area in the Western San Diego County P-C Region is reclassified to MRZ-2 from MRZ-1 and MRZ-3:

Cottonwood Golf Course: Approximately 167 acres, four miles southeast of El Cajon and three miles east of Casa de Oro, are reclassified to MRZ-2 from MRZ-1 and MRZ-3.

Alluvial sand and gravel deposits along the middle reach of the Sweetwater River Valley near Jamacha historically have been mined on a small scale. Aggregate resource evaluation reports provided to CGS indicate that aggregate resources at this site meet engineering specifications for PCC-grade aggregate and threshold value requirements.

Areas Reclassified to MRZ-3 from MRZ-2 in this Update Report

Hanson Aggregates, Inc. Oceanside/Carlsbad Pit: An 82-acre site in the City of Oceanside south of State Route 78 and west of College Avenue, previously classified MRZ-2 for PCC-grade aggregate in SR 153 and OFR 96-04, is reclassified to MRZ-3 for PCC-grade aggregate. This area was underlain by dacite volcanic rocks. The material, previously mined for a variety of uses, is apparently mined-out; the site is being developed to other uses.

Hanson Aggregates, Inc. Pala Sand Pit: A 127-acre site in the San Luis Rey River Valley south of State Route 76 and west of Pala, previously classified MRZ-2 for PCC-grade aggregate in SR 153 and OFR 96-04, is reclassified as MRZ-3 for PCC-grade aggregate in this update report. This site was underlain by Quaternary age alluvial deposits of the San Luis Rey River. The material, PCC-grade sand and gravel, is reportedly mined-out and site reclamation was certified complete by the lead agency in 2005.

CalMat Company Pala Reservation Pit: A 220-acre site in the San Luis Rey River Valley north of State Route 76 and east of Pala, previously classified MRZ-2 for PCC-grade aggregate in SR 153 and OFR 96-04 is reclassified as MRZ-3 for PCC-grade aggregate in this update report. This site was underlain by alluvial fan deposits eroded from the Palomar Mountains. These sand and gravel deposits of PCC-grade are apparently mined-out. The site is within the jurisdiction of the Pala Band of Mission Indians.

Miramar Marine Corp Air Station: Approximately 1,116 acres south of the main runways of the Marine Corp Air Station Miramar, north of State Route 52 previously classified MRZ-2 for PCC-grade aggregate in SR 153 and OFR 96-04 is reclassified as MRZ-3 for PCC-grade aggregate in this update report. This site is now the location of nearly filled municipal landfills; it was underlain by sand and gravel deposits of the Eocene age Poway Fan.

Enniss, Inc. San Vicente Pits: Two areas totaling about 37 acres along San Vicente Creek in the Moreno Valley south of San Vicente Reservoir and east of State Route 67 were classified MRZ-2 for PCC-grade aggregate in OFR 96-04. These areas are reclassified MRZ-3 for PCC-grade aggregate in this update report. This site was underlain by Quaternary age alluvial deposits of the San Vicente Creek. The material, sand and gravel of PCC-grade, is reportedly mined-out.

Hanson Aggregates, Inc. El Monte Sand Pit: A 104-acre site in the San Diego River Valley east of Lakeside, previously classified MRZ-2 for PCC-grade aggregate in SR 153 and OFR 96-04 is reclassified as MRZ-3 in this update report. This site is underlain by Quaternary age alluvial deposits of the San Diego River. The material, sand and gravel of PCC-grade, is reported to be mined-out. The site ceased production in 2009.

PART II - UPDATE OF MINERAL LAND CLASSIFICATION OF PCC-GRADE AGGREGATE IN THE WESTERN SAN DIEGO COUNTY P-C REGION

This section of the report contains updated information concerning the location, quality, and quantity of PCC-grade aggregate resources in the Western San Diego County P-C Region.

MINERAL RESOURCE ZONES

As set forth in Section 2761(b) of SMARA, the State Geologist shall classify land solely on the basis of geologic factors and without regard to existing land use. Areas subject to mineral land classification are divided by the State Geologist into various MRZ categories that reflect varying degrees of mineral resource potential.

MRZ-1: Areas where available geologic information indicates that little likelihood exists for the presence of significant mineral resources.

MRZ-2: Areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists. This zone shall be applied to known mineral deposits or areas where well-developed lines of reasoning, based upon economic-geologic principles and adequate data, demonstrate that the likelihood for occurrence of significant mineral deposits is high.

MRZ-3: Areas containing mineral occurrences of undetermined mineral resource significance.

MRZ-4: Areas where available information is inadequate for assignment to any other MRZ category.

CLASSIFICATION CRITERIA

To be considered *significant* for mineral land classification, a mineral deposit, or a group of mineral deposits that can be mined as a unit, must meet marketability and threshold value criteria adopted by the SMGB (http://www.conservation.ca.gov/smgb/pages/index.aspx). Mineral deposits considered significant in this report must meet the specifications for PCC-grade aggregate. Threshold values are intended to indicate in a general way the approximate minimum size of a mineral deposit that will be considered significant for classification and designation. The threshold value criteria vary for different mineral deposits depending on their uniqueness and commodity-type category.

The SMGB determined threshold value of the first marketable product in 1998 dollars to be $12,500,000 for construction aggregate deposits. To adjust these threshold values to reflect 2015 dollars, each value was multiplied by an inflation factor of 1.53. This factor was determined by

dividing the U.S. Department of Labor's estimated Consumer Price Index for California (California Department of Finance website, February 2016) for December 2015 (250.711), by the Consumer Price Index for 1998 (163.7). The threshold value in 2015 dollars for construction aggregate is $19,144,000. The average price of concrete-grade aggregate (AC- and PCC-) in the Western San Diego County P-C Region ranges from about $16 to $18 per ton; washed concrete-grade sand ranges from about $20 to $24 per ton. Therefore, assuming an average price of $20 per ton, $19,144,000 equates to about one million tons of aggregate material.

REEVALUATION OF MINERAL LAND CLASSIFICATION FOR PCC-GRADE AGGREGATE

This report reevaluates the original mineral land classification of the Western San Diego County P-C Region in SR 153 published in 1982, and the first update report (OFR 96-04) published in 1996. It also includes information published in the petition reports OFR 88-16 (Clinkenbeard, 1988), OFR 89-15 (Clinkenbeard, 1989), and SR 191 (Busch, 2006). A description of the areas reclassified in these petition reports is included below. Analysis of new data obtained since those five publications resulted in two new areas (Jamacha Rock Quarry and Cottonwood Golf Course) in the Western San Diego County P-C Region being reclassified from MRZ-1 or MRZ-3 to MRZ-2 for PCC-grade aggregate. Seven areas have also been reclassified from MRZ-2 to MRZ-3 because of apparent depletion of resources. Plate 1 provides the Updated Mineral Land Classification Map.

Areas Reclassified to MRZ-2 by Petition

Prior to this update report, three sites were previously reclassified to MRZ-2 by petition. These petitions include:

Sycamore Ridge Property: A 482-acre area in northwestern San Diego County, on the west flank of the Merriam Mountains, five miles northeast of the City of San Marcos. The area is underlain by Cretaceous age granodiorite of the Peninsular Ranges batholith. Test data provided by the petitioner indicates material from this site meets quality standards for PCC-grade aggregate. The property was reclassified to MRZ-2 from MRZ-3 in OFR 88-16 (Clinkenbeard, 1988).

Rosemary's Mountain Quarry Property: A 78-acre area in northern San Diego County, north of State Route 76, approximately one mile east of Interstate Highway 15. The area is underlain by the Cretaceous age leucogranodiorite of Indian Mountain. Test data provided by the petitioner indicates fresh rock material from this site meets quality standards for PCC- and AC-grade aggregate, base, and subbase. The property was classified MRZ-2 for aggregate materials in OFR 89-15 (Clinkenbeard, 1989).

Twin Oaks Quarry Property: A 164-acre area in northwestern San Diego County, low on the east slope of the San Marcos Mountains, five miles north of the City of San Marcos. The area is underlain by Cretaceous age gabbro and granodiorite of the Peninsular Ranges batholith. Test data provided by the petitioner shows that, with appropriate processing, material from this site meets quality standards for PCC- and AC-grade aggregate. The property was reclassified to MRZ-2 from MRZ-3 in SR 191 (Busch, 2006).

Board of Supervisors Presentation by Brian Lorenz
September 10, 2025
Agenda Item 6
Cottonwood Sand Mine Major Use Permit

Good morning, I'm Brian Lorenz.

The Applicant thinks, "the Final EIR... is an appropriate source of evidence and information relevant to the MUP findings."

(graphic: Proposed Mine Aerial View)

Contrary to what they *think*, County staff disagrees stating, "information included in the Final EIR is NOT relevant to the question of whether the appropriate MUP findings can be made."

Regarding the Required Legal Findings:

Finding 1. <u>Harmony</u> in scale, bulk, coverage, and density

The fact is, an open pit sand mine in a residential neighborhood is as *DIS*-harmonious as two things can be.

(graphic: Communities Affected)

Rancho San Diego and the surrounding area has a population of over 100,000 people.

The Applicant acts like phasing the project could make it acceptable. They want to strip this site in 12 phases, of up to 30-acres each, to a depth of 40 feet... *in the middle of a residential neighborhood.*

That's a *crater* 4 stories deep the size of 23 football fields. And that's just ONE phase. This *cratering* would repeat over and over and over again for *at least* 10 years.

It's far bigger and far more dangerous than they want **you** to believe.

Finding 3. Harmful effect upon desirable neighborhood character

(graphic: Bridge Fences Image)

In addition to the visual impacts, the mine would create significant noise and air quality impacts.

And, as if decibels and dust simply fall to the ground within a few feet, the Applicant is adamant about a laughable 100-foot setback from residences and schools. Like that could stop the ripple effect of destruction.

(NO GRAPHIC)
Well it can't. Silica dust is the most harmful component of particulate matter and a known human carcinogen. Why? It's easy to understand when you realize that asbestos is also a naturally occurring silicate. Silica dust and asbestos are virtually the same.

This silica dust carcinogen does NOT simply fall to the ground. Studies prove it can remain airborne for up to several days and can drift over a mile... One mile, NOT 100 FEET.

Silica dust is a significant public health risk. And a neighborhood where carcinogens are pumped into the air all day, every day, for residents, children and the elderly to breathe, is NOT a desirable neighborhood.

And regarding aesthetics, this is a **significant** impact that EVERYONE—including the Applicant—acknowledges cannot be mitigated.

Finding 4. Generation of traffic and the capacity and physical character of surrounding streets

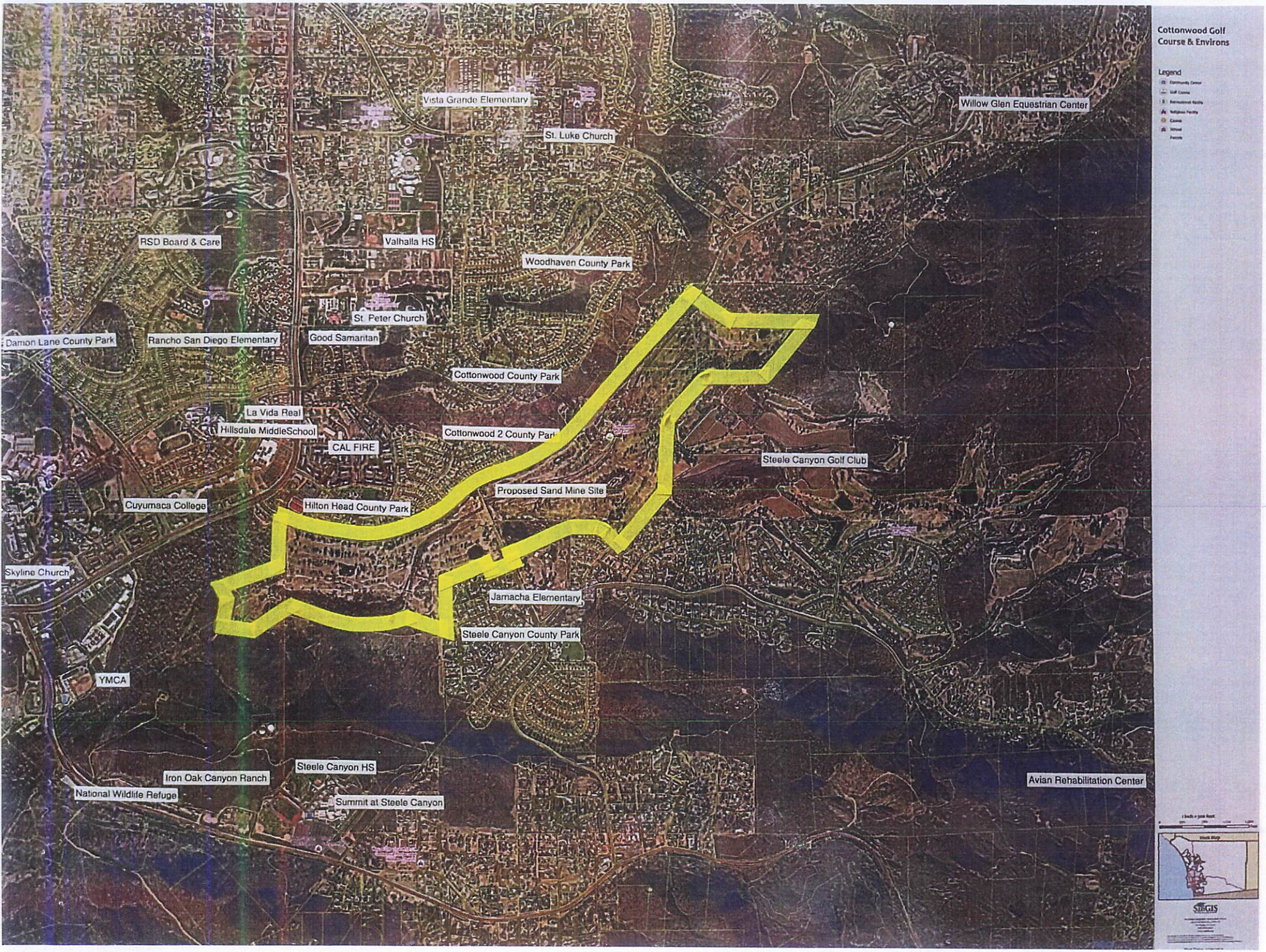
According to the California Highway Patrol, in the past five years on Willow Glen Drive, over 300 people have been injured or killed in traffic accidents.

The scene becomes more deadly when you imagine the current load of semis and cars approaching their three new intersections at over 45 mph. Intersections with narrowed lanes and no shoulder.

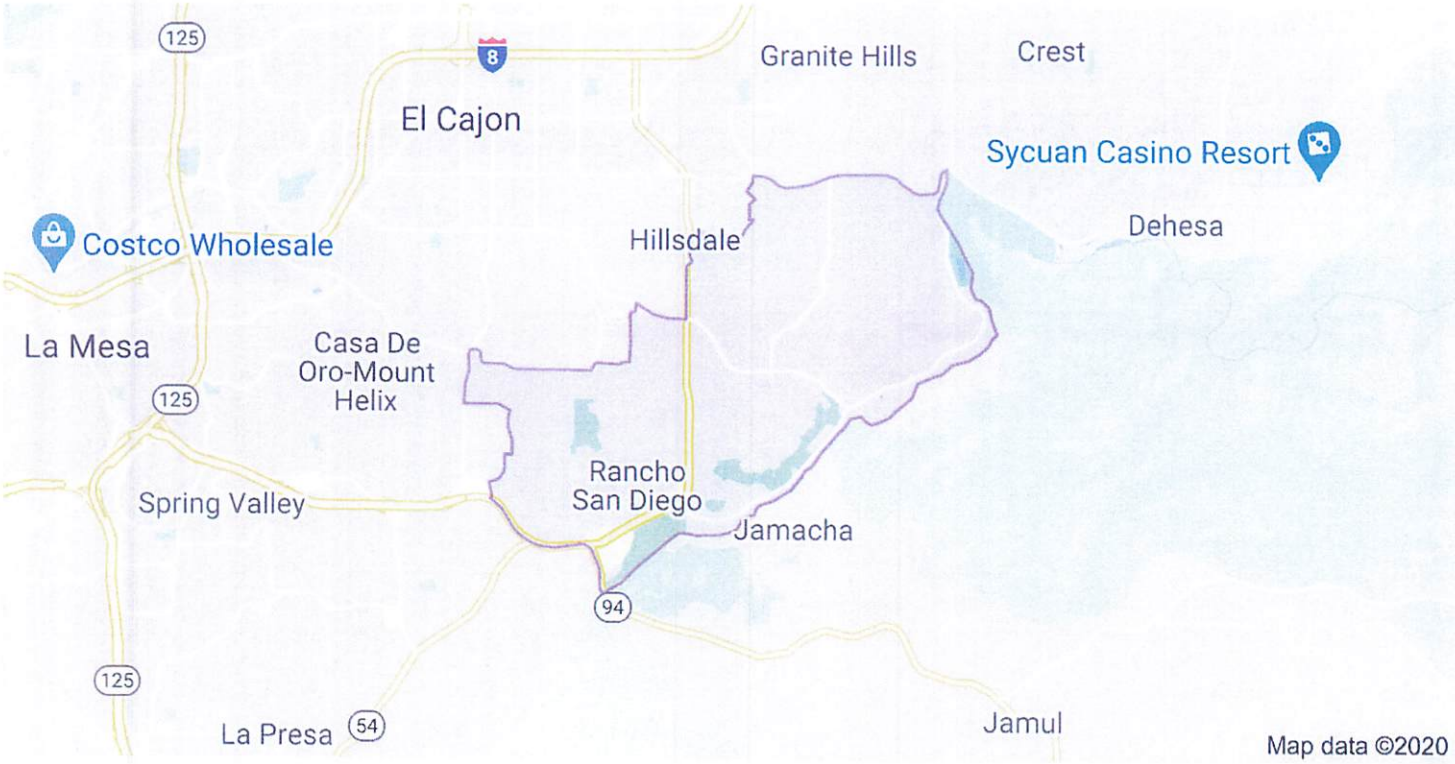
In the EIR, the Applicant camouflages the true traffic impact. A closer look at their recent Average Daily Traffic count shows 4,353 vehicles between 9am and 3:30pm. That's the same time that the Applicant plans to lob 296 Heavy Haul truck trips into the mix which is the "Passenger Car Equivalent" of 740 additional vehicles. A staggering jump of almost 20% more traffic; and ALL of it slow moving!

This traffic nightmare would happen **every day** slowing traffic and endangering commuters, parents, school children, and cyclists. It will make Willow Glen and adjacent streets far **MORE** dangerous; compounding the previously acknowledged health and safety issues.

Barry ...


Cottonwood Golf Course & Environs
Legend
Vista Grande Elementary
Willow Glen Equestrian Center
St. Luke Church
RSD Board & Care
Valhalla HS
Woodhaven County Park
St. Peter Church
Damon Lane County Park
Rancho San Diego Elementary
Good Samaritan
Cottonwood County Park
La Vida Real
Hillsdale MiddleSchool
CAL FIRE
Cottonwood 2 County Park
Steele Canyon Golf Club
Proposed Sand Mine Site
Cuyumaca College
Hilton Head County Park
Skyline Church
Jamacha Elementary
Steele Canyon County Park
YMCA
Steele Canyon HS
Iron Oak Canyon Ranch
National Wildlife Refuge
Summit at Steele Canyon
Avian Rehabilitation Center

WHAT WILL BE IMPACTED?



COMMUNITIES

ALPINE
AVOCADO ESTATES
AVOCADO VILLAGE
BELLA TERRA
BONITA
CANTERBURY HILLS
CHULA VISTA
CORTE MADERA
COTTONWOOD
CREST
DEHESA
DEL RIO
DULZURA
EL CAJON
FUERTE HILLS
FUERTE KNOLLS
FURY
GRANITE HILLS
HIDDEN MESA
IVANHOE RANCH
JAMACHA ROAD
JAMUL
LA MESA
LA PRESA
LAKEVIEW POINTE
LA TIERRA
LEMON GROVE
LOMA RANCHO
MONARCH RIDGE
MOUNT HELIX
MOUNT MERRITT
NATIONAL CITY
PARADISE
PAR FOUR
PASATIEMPO
VISTA GRANDE
RANCHO SAN DIEGO
RANCHWOOD
SINGING HILLS
SPRING VALLEY
STEELE CANYON ESTATES
SWEETWATER VILLAGE
SYCUAN
VALHALLA
VISTA CIELO/VIA CALIENTE
WEST VILLAGE
WILLOW GLEN DRIVE
YBARRA ROAD

CHURCHES

SKYLINE CHURCH
SUMMIT AT STEELE CANYON
ST. PETER CHALDEAN CATHEDRAL
ST. LUKE CATHOLIC CHURCH
ST. JOSEPH CHALDEAN CHURCH
FOOTHILLS UNITED METHODIST
PROVIDENCE CHURCH

SCHOOLS/DAYCARE FACILITIES

FUERTE ELEMENTARTY
RANCHO SAN DIEGO ELEMENTARY
JAMACHA ELEMENTARY
HILLSDALE MIDDLE SCHOOL
VALHALLA HIGH SCHOOL
STEELE CANYON HIGH SCHOOL
JAMUL PRIMARY SCHOOL
OAK GROVE MIDDLE SCHOOL
JAMUL INTERMEDIATE SCHOOL
AVOCADO ELEMENTARY
CUYAMACA COLLEGE
RANCHO SAN DIEGO KINDERCARE
LITTLE SPROUTS RANCHO SAN DIEGO
COLLEGE PREP MIDDLE SCHOOL
KUMEYAAY COMMUNITY COLLEGE
LA VIDA REAL RETIREMENT HOME
GOOD SAMARITAN RETIREMENT HOME
RANCHO SAN DIEGO BOARD & CARE
EL CAJON KINDERCARE
SKYLINE CHILD DEVELOPMENT CENTER
CUYUMACA CHILD DEVELOPMENT CENTER
TAPROOT MONTESSORI PRESCHOOL

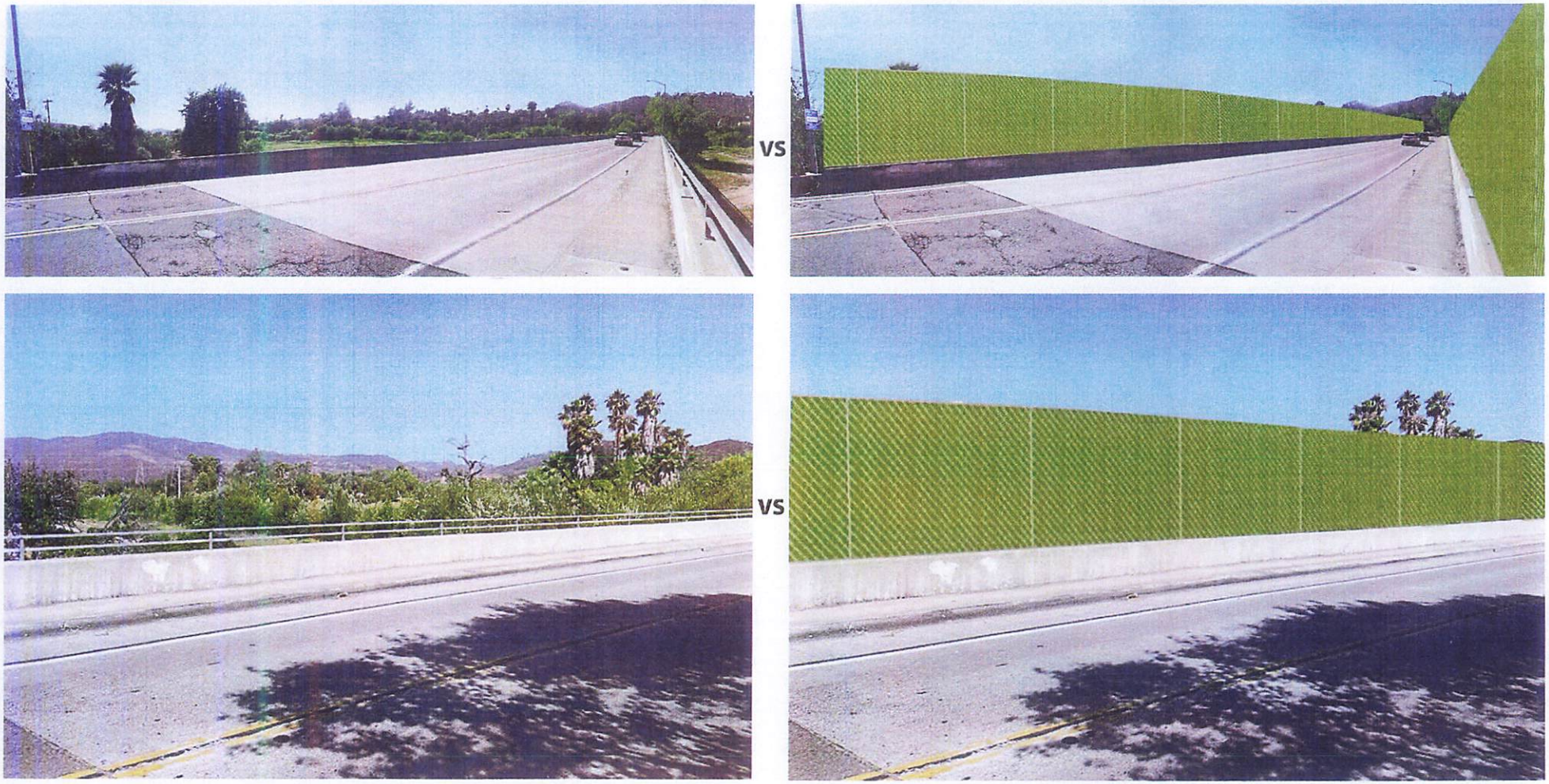
RECREATION

WATER CONSERVATION GARDEN
WILLOW GLEN EQUESTRIAN CENTER
MCGRATH YMCA
24-HOUR FITNESS
STEELE CANYON GOLF CLUB
SINGING HILLS GOLF RESORT
HILTON HEAD & STEELE CANYON COUNTY PARKS
MCGINTY MOUNTAIN ECOLOGICAL RESERVE
SAN DIEGO NATIONAL WILDLIFE REFUGE

FINDINGS #3 AND #4 AT A GLANCE

Desirable Neighborhood Character
with Cottonwood Golf Course

Future Significant Impact
with Cottonwood Sand Mine



Finding #3: Harmful effect upon desirable neighborhood character.
(*ALL* parties acknowledge that Finding 3 ***cannot*** be met).

Finding #4: Generation of traffic and the capacity and physical character of surrounding streets.

Board of Supervisors Presentation by Barry Jantz
September 10, 2025
Agenda Item 6
Cottonwood Sand Mine Major Use Permit

Good morning, I'm Barry Jantz. As a former union laborer and retired union journeyman carpenter, I stand in opposition to this project.

That's because my colleagues and I are focused on the facts and the legal findings that cannot be made.

Finding #5 is the suitability of the site for the type and intensity of use or development proposed.

County staff is spot on ... This site is definitely not suited for a sand mine.

Not only is the site designated Open Space/Recreation in the General Plan, it is part of the County's Biological Resource Core Area, a high-value habitat corridor. The sand mine would fragment, destroy, and degrade these important areas, further threatening the viability of the region's wildlife and natural habitat.

Over 485 homes, 14 apartment complexes, 4 restaurants, 3 parks, an ecological reserve, and an elementary school, all within a quarter mile of the mining operation, would be directly impacted. And rest assured, the devastating effects of an open pit industrial mine operation will reach far beyond a quarter mile, with no guarantee the project lasts only ten years.

In addition, the site is located within the floodplain of the Sweetwater River, an area intended for conservation, not an industrial-type development.

The Sweetwater Authority depends on the Sweetwater River watershed, serving and providing drinking water to approximately 200,000 people living in Chula Vista, National City, and Bonita.

Concerns include water quality, hydrology, groundwater recharge, increased risk of flooding, and water pollution. The Authority relies on the ability to transfer water from Loveland Reservoir to its water treatment facilities. This includes the capture of local runoff in the Sweetwater River.

Sweetwater has clearly documented its concerns about this project since 2018, stating, "the Authority outlined a variety of environmental, water quality, water rights, and engineering concerns for the County and the project proponent's consideration."

Yet, the project has gotten this far while the Authority says its concerns still exist and remain unresolved.

The bottom line is this:

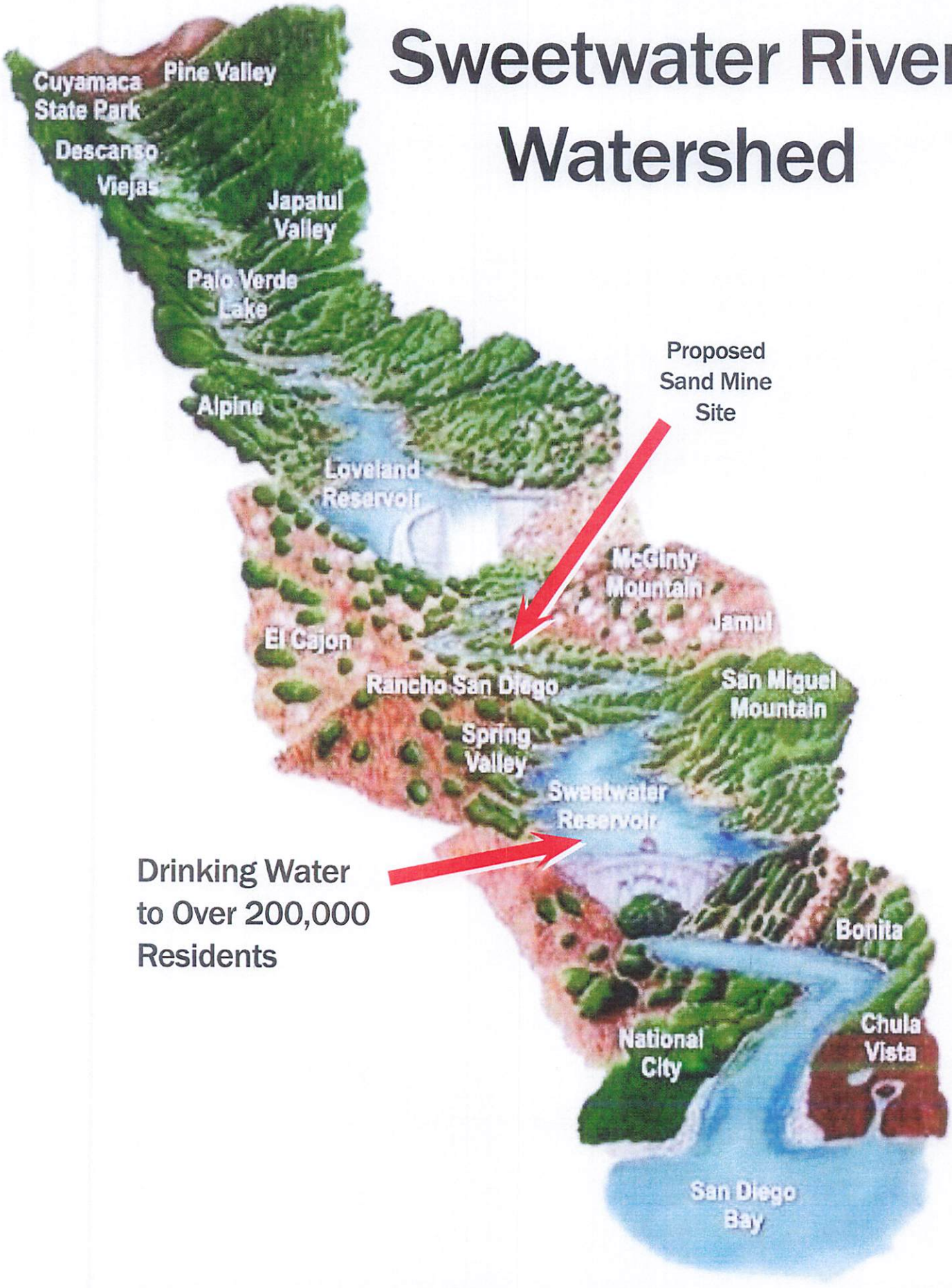
The fact is that no argument the applicant makes overshadows or supersedes the required legal findings.

The fact is the required legal findings to approve this project cannot be made.

We ask the Supervisors to deny this appeal and to deny this project.

Thank you.

Sweetwater River Watershed



SWEETWATER AUTHORITY
505 GARRETT AVENUE
POST OFFICE BOX 2328
CHULA VISTA, CALIFORNIA 91912-2328
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February 24, 2022

Robert Hingtgen
Land Use/Environmental Planner
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Subject: Comments on the Cottonwood Sand Mine Project Draft Environmental Impact Report, PDS2018-MPA-18-004
SWA File: (Gen) Land Use and Environmental – Watershed Review – Cottonwood Sand Mining

Dear Mr. Hingtgen:

Thank you for providing Sweetwater Authority (Authority) with a Notice of Availability of a Draft Environmental Impact Report (DEIR) for the proposed Cottonwood Sand Mining Project (Project). The Project, if approved, would convert two golf courses located within the floodplain of the Sweetwater River to sand mining operations that would impact approximately 214 acres of land over a period of 10 years.

The Authority provided comments on the Project to the County of San Diego (County) in an Initial Concerns Letter dated December 13, 2018, which was prepared in response to a draft project description. Additional comments were provided in a second letter, dated September 27, 2019, which was prepared in response to the Initial Study (IS) and Notice of Preparation (NOP) of the Environmental Impact Report (EIR). In these two letters, the Authority outlined a variety of environmental, water quality, water rights, and engineering concerns for the County and the project proponent's consideration. The Authority letters referred herein are provided as part of Appendix A of the DEIR.

At the time of the NOP and IS circulation, it was concerning to the Authority that the NOP, IS, and associated engineering drawings failed to address many of the comments provided by the Authority in its Initial Concerns Letter, which was provided months before the circulation of the IS and NOP. Examples of concerns not addressed in the 2019 IS include the following:

- Description of the Authority's periodic water transfers between Loveland Reservoir and Sweetwater Reservoir
- Impacts to water transfers resulting from mining operations and widening of the floodplain
- Consideration of water transfers in the initial hydrology and water quality analysis

- Potential for pollution at Sweetwater Reservoir, a source of drinking water for 200,000 people
- Request for identification of pollutants of concern at the mining site
- Consideration of atmospheric river events that may not be properly mitigated with only the implementation of standard construction and/or industrial BMPs, and how atmospheric river events may result in additional risk of pollution at Sweetwater Reservoir if the Cottonwood sand mining operation is approved
- Sources of fill for mined areas
- Potential impacts to water quality from proposed conveyor belt
- Potential additional water treatment expenses at the Robert A. Perdue Water Treatment Plant (Perdue Plant) resulting from potential exacerbated water quality issues at Sweetwater Reservoir, resulting from the proposed mining site

Similar to the 2019 IS, the circulated DEIR and associated documents have not addressed many of the Authority's concerns with the proposed mining Project, including many of the matters listed above and other concerns described in the Authority's second letter.

The Authority owns and operates Loveland Reservoir, Sweetwater Reservoir, and the Perdue Plant. The Authority is a water district that depends on the health of the Sweetwater River watershed, and serves and provides drinking water to approximately 200,000 people living in western Chula Vista, National City, and Bonita, and has more than 33,000 service connections in its service area. To the Authority, the concerns with the proposed mining operation and impacts to water quality, hydrology, and to the Authority's ability to transfer water, are a serious matter that need to be properly addressed in the DEIR and completely mitigated where needed. The Authority requests that the County and the project proponent spend the necessary time and resources in order to provide a complete analysis and appropriate mitigation measures, even if this means preparing major revisions to the proposed project components, their technical appendices, engineering drawings, or having to recirculate the DEIR.

The Authority comments on the DEIR and associated documents are as follow:

1.0 Impacts to Hydrology, Water Quality, and Utilities – Lack of Mitigation Measures

The 2019 IS identified three areas of concern where the proposed project could result in potentially significant impacts to hydrology and water quality, and would need to be fully analyzed in the DEIR, resulting in the development of enforceable mitigation measures. The three areas of concern are the following:

- E & F) substantial alterations to the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner

which would result in substantial erosion or siltation on or off-site (Pages 28-29, 2019 Initial Study);

- J) Placement of structures within a 100-year flood hazard area which would impede or redirect flood flows (Page 30, 2019 Initial Study); and
- K) Exposing people or structures to a significant risk of loss, injury or death involving flooding (Pages 30-31, 2019 Initial Study).

Instead of developing the needed mitigation measures to address the initially identified potential impacts to hydrology and water quality, the DEIR failed to identify or develop any enforceable mitigation measures to address potential impacts to these areas of concern, and has concluded that the significance of the . impacts for these three areas of concern listed above is "less than significant."

The DEIR does include certain "project design components" in the updated project description (Pages 1-21 and 1-22), and it includes the same language as part of the discussion in the hydrology and water quality analysis. These project design components, which are discussed below, seem to be an attempt to alleviate some of the Authority's concerns, but none of these project design components are presented in the DEIR as mitigation measures or are fully analyzed to ensure their effectiveness. Some of these project design components, if further analyzed, could be considered mitigation measures, as their sole purpose seems to be mitigating impacts related to 1) flooding at the mining site, 2) serious water quality and water resources impacts associated with mining operations in the floodplain, and 3) impacts to the Authority's water transfers, which are considered an essential function of the Authority.

A project of this magnitude needs well-developed and properly analyzed enforceable mitigation measures to prevent impacts to hydrology, water quality, and public utilities. The DEIR does not provide adequate analysis on these topics. Examples of these project design components that should be further developed and analyzed in the DEIR, and very likely recategorized as enforceable mitigation measures, are discussed below.

1.1 Installation of berms during sand mining operations

The DEIR's Project Description and the Hydrology and Water Quality analysis briefly mention, as a project design component, that if mining would occur within ten feet of the river's low flow channel, the project proponent would construct berms approximately five feet in height to separate operation areas from the low flow channel, as needed. The berm locations would be adjusted as mining progresses and would be set back from mining activities (DEIR Page 1-21). This project design component is presumably an effort to avoid the capture of water being transferred, and while the installation of berms may be well intended, this action should be completely analyzed by the County and the project proponent, in order to prove its effectiveness.

As currently written, the DEIR does not require the installation of berms. Instead, it gives the project proponent the option and full discretion to install berms if they think berms are necessary. If the mining operator chooses not to install the berms in the future, who would be responsible for enforcing this measure?

None of the technical appendices provided in the DEIR, including the drainage study or the engineering drawings, properly analyzed the construction and installation of berms during mining activities. While the construction of "short berms" is briefly mentioned in the drainage study and in the hydrology and water quality section of the DEIR as an optional solution to ensure no significant mining impacts occur on water transfers, the drainage study and engineering drawings do not provide any meaningful analysis on the construction and installation of these berms. This lack of technical information is not trivial, especially since it seems that the "berms" project component is being proposed by the County and the project proponent in lieu of an enforceable mitigation measure.

As currently presented, the County and project proponent appear to be considering, without any securities, that the mine operator is fully capable of constructing and installing two berms (one on each side of the river channel) that may need to be hundreds of linear feet long, at a given moment's notice, in order to mitigate impacts to hydrology, water quality, flooding at the site, and impacts to the Authority's water transfers. Construction and installation of berms is not a trivial engineering matter, and a proper analysis with a well-developed protocol needs to be prepared and reviewed by the County, the Authority, and applicable regulatory agencies, in order to ensure the berms function as intended.

The drainage study and project description seem to indicate that the proposed berms would be built, if needed, to accommodate for water transfers only, which is an incorrect assumption. In addition to the flows created by water transfers, these berms (or whatever mitigation measure that is ultimately developed) would also need to accommodate for flows resulting from multiple upstream tributaries in the watershed (i.e. water transfers + watershed flows resulting from significant storm events at the same time).

Given that a proper engineering analysis regarding the use of berms during mining operations is not provided, reviewers of the DEIR and appendices have not been able to comment on the effectiveness of the berms project component, and therefore the DEIR analysis is flawed and incomplete. Before continuing to move forward with the CEQA process, the County and project proponent should properly analyze the berms project component and reconsider this optional component as a mitigation measure that needs to be fully analyzed for its effectiveness. The drainage study – hydraulic analysis needs to consider the berms and if placement of the berms within 10 feet of the river's low flow channel is the appropriate distance based on the maximum anticipated flow through the

project site, inclusive of water transfers from Loveland Reservoir and large storms, such as a 100-year storm event.

1.2 Installation of permanent berms during the reclamation of the mining site

The DEIR mentions that berms could be incorporated as part of the final reclamation plan, where needed, to prevent significant impacts on the Authority's operations (i.e. water transfers). The Authority has commented in the past regarding long-term water losses due to the proposed widening of the river channel and, although the County and project proponent did not develop an enforceable mitigation measure in the DEIR to prevent potential water losses from happening, the Authority appreciates the concern the County and the project proponent have shown in trying to mitigate this long-term impact. However, these permanent berms must be properly analyzed under CEQA and must be included in the reclamation plan.

If the permanent berms are indeed intended to prevent or minimize water losses to the Authority, these permanent berms need to be analyzed in the DEIR, the technical appendices, and be included in the reclamation plan. Without proper analysis of these permanent berms, project reviewers cannot comment on the effectiveness of these berms, and therefore the DEIR's analysis and reclamation plan, as presented, are flawed and incomplete.

The installation of permanent berms should have been presented in the DEIR as a mitigation measure in the hydrology and water quality section or in the public utilities section, as the sole purpose of these permanent berms is to mitigate impacts related to the Authority's operations and water transfers. A proper engineering analysis needs to be conducted by the project proponent and reviewed by the County in close consultation with the Authority and applicable regulatory agencies, in order to ensure the berms function as intended.

As "accommodating water transfers" between the two reservoirs is one of the project objectives (DEIR, Page 1-1), these permanent berms should have been depicted in the engineering drawings provided as part of the reclamation plan.

The DEIR does not answer the following questions regarding the permanent berms:

1. Who would be responsible for the permanent berms' maintenance, repairs, or adaptive management?
2. What would happen if these permanent berms fail during a water transfer, after the project proponent is no longer involved?
3. Who is liable if people get injured or die, or property damage occurs, due to berm failure during a water transfer?

4. Who would compensate the Authority for water losses if the berms fail during a water transfer?

Similarly, neither the County nor the project proponent have approached the Authority to discuss any of these matters. As such, the Authority requests that the County do not provide project approvals until these questions and other questions of a similar nature are answered to the satisfaction of the Authority.

The Authority also requests that additional engineering analysis be performed to demonstrate that the proposed permanent berm will fully mitigate water losses. Additionally, the DEIR impact analysis and Reclamation Plan should be updated to reflect that. It is important to note that water losses associated with the proposed mining activities will not be acceptable to the Authority, a public water utility operating continually under drought conditions and with senior water rights in the Sweetwater River watershed. The County and the project proponent should properly analyze a long-term solution (permanent berms or otherwise) before moving forward with the approval of the DEIR or Reclamation Plan. Before granting any permits, the County should ensure that water losses to the Authority resulting from the proposed mining operation, or its reclamation plan, will be fully avoided or mitigated.

1.3 Mining during the rainy season

The project description indicates, as a project component, that "*to ensure that excavation activities would not substantially affect Sweetwater Authority water transfers between the Loveland and Sweetwater Reservoirs, mining activities during the rainy season (generally November through March) would be located away from the river channel, to the extent feasible* (DEIR, 1-21)".

- Who is responsible for the implementation of this project design component? The DEIR does not identify who is responsible for implementing this project design component, or who is responsible for enforcing that this project component is implemented.

- What are the repercussions if the mining operator decides not to implement this project component?

- The language provided says that this project component would be implemented "to the extent feasible". The Authority would like to know in which instances it would be appropriate for the project proponent to conduct mining operations within or near the river channel area during the rainy season. Have these instances where mining operations would occur within or near the river channel during the rainy season been identified and discussed in the DEIR, and will they be mitigated as necessary?

- Why is this "project design component" not presented in the DEIR as a mitigation measure, if its entire purpose is mitigating an impact to hydrology, water quality, and the Authority's operations? By presenting this measure as a project component and not as a mitigation measure, the DEIR fails to identify what the real impacts of the project are on hydrology, water quality, and to the Authority's operations.

- The DEIR does not provide information on how impacts to water transfers are being analyzed. To further develop on this, the DEIR has language such as "*excavation activities would not substantially affect Sweetwater Authority water transfers*", but the DEIR lacks a complete discussion or analysis on thresholds of significance regarding this impact to a public utility's vital operation. As noted above, there are references to installation of short-term berms and permanent berms, but no real analysis. In order to properly quantify this impact to the Authority's operations, this important impact information needs to be properly analyzed, either under the hydrology and water quality section of the DEIR, or the utilities and services systems section.

1.4 Need of a bypass channel – Impacts to Utilities and Service Systems

By adding the measures described in Sections 1.1, 1.2, and 1.3 of this letter as project components and not as mitigation measures, the Hydrology and Water Quality section of the DEIR is inadequate as it doesn't reflect the real potential impacts of this project. The same can be said for the Utilities and Service Systems section, as any impact to a water transfer from the proposed mining operation is not only an impact on the quality of the water being transferred, but also an impact on the Authority's ability to continue one of its main operations, which is the transfer of water between two reservoirs for treatment and distribution.

The following comment was provided to the County in the Authority's second letter dated September 27, 2019, which addressed the information provided in the NOP and 2019 IS. This comment addresses the potential need to build new facilities in order to mitigate impacts to the Authority's operations (i.e. water transfers).

> *"The Utilities and Service Systems Section of the IS Environmental Checklist includes the following question:*
>
> > *"Would the project require or result in the relocation or construction of new or expanded water, wastewater, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?"*

> *The County and project proponent must consider the need of constructing new facilities, including a bypass channel that may be necessary to satisfy the Authority's needs to transfer water between its two drinking water reservoirs.* ***Proposed sand mining operations cannot interfere nor have a negative effect on the river's ability to convey water to Sweetwater Reservoir.****"*

While water being transferred between two reservoirs may not be the typical scenario that the County or project proponent has analyzed in other projects, and while the river channel may not be commonly associated as an asset of a water district, any impact to the river channel has a potential impact on the periodic water transfers. Transferring water between reservoirs using the river channel is a major water operation, and mining within the river channel could be considered an impact to the Authority's operations, therefore it should be properly analyzed in the DEIR.

The Authority and its predecessors have worked very hard for more than a century in order to secure properties and agreements in the Sweetwater River watershed in order to have the ability to build dams and reservoirs, transfer water between those reservoirs, and ultimately treat and distribute that water in National City, western Chula Vista, and the unincorporated community of Bonita. The middle basin of the Sweetwater River has historically been an essential part of the Authority's operations, and should continue to provide this service for many years to come. The County and the project proponent have briefly described the use of berms to potentially address the need for protecting water transfers, but have failed to recognize that the project could have a significant impact on utilities, which needs to be fully mitigated.

1.5 Additional concerns with the County's hydrology and water quality determinations

While the Hydrology and Water Quality section of the DEIR discusses compliance with applicable regulations, implementation of Best Management Practices (BMPs) and a Storm Water Pollution Prevention Plan (SWPPP), the analysis does not describe implementation of stormwater prevention plans as mitigation measures. The Authority recommends that the County reconsider the approach of presenting BMPs, SWPPP implementation, and other mitigating actions that minimize impacts to water quality as conditions or components of the project, as this approach may not be appropriate for the proposed mining operation. The Authority understands that, in some cases, small development projects that are subject to stormwater regulations and that have to comply with multiple regulations and ordinances, having a potential impact on water quality is low or nonexistent. However, this is not the case for the proposed mining operation. For the subject project – a 214.4-acre mining site located upstream of a

drinking water reservoir with the potential to disturb and significantly reshape the river floodplain – stormwater pollution control measures should be considered mitigation measures, given that their main goal would not only be reaching compliance with stormwater regulations, but implementation of these plans and BMPs would be mitigating, to the greatest extent possible, impacts to hydrology and water quality. The DEIR fails to identify measures to mitigate potential impacts associated with stormwater pollution.

Similarly, the County has adopted guidelines for Determining Significance for Surface Water Quality (Surface Water Guidelines). These Surface Water Guidelines, which can be found on the County website[1], require consideration of the following three matters in order to appropriately respond to the questions in the Environmental Checklist:

1. *The project is a development project listed in County of San Diego, Code of Regulatory Ordinances (Regulatory Ordinances), Section 67.804(g), as amended and does not comply with the standards set forth in the County Stormwater Standards Manual, Regulatory Ordinances Section 67.813, as amended, or the Additional Requirements for Land Disturbance Activities set forth in Regulatory Ordinances, Section 67.*

2. *The project would drain to a tributary of an impaired water body listed on the Clean Water Act Section 303(d) list, and will contribute substantial additional pollutant(s) for which the receiving water body is already impaired.*

3. *The project would drain to a tributary of a drinking water reservoir and will contribute substantially more pollutant(s) than would normally runoff from the project site under natural conditions.*

Per Item 2 above of the Surface Water Guidelines, the subject project would drain to the Sweetwater River, which is a tributary to Sweetwater Reservoir. The Sweetwater Reservoir is a water body listed on the Clean Water Act Section 303(d) list for Dissolved Oxygen. The Authority requests that mitigation measures be developed to ensure project activities do not contribute additional pollutants to the reservoir. For additional information on the potential impacts that need to be fully mitigated, see comments below (Section 6 and Section 7).

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[1] Link to Surface Water Guidelines:
https://www.sandiegocounty.gov/content/dam/sdc/pds/docs/water_quality_guidelines.pdf

Per Item 3 above of the Surface Water Guidelines, the subject project would drain to a tributary of a drinking water reservoir. Per the DEIR analysis (Appendices S and T of the DEIR), the subject project would contribute more pollutants than would normally runoff from the project site under natural conditions. As such, the Authority requests that the Hydrology and Water Quality section be revised and mitigation measures for such impacts or potential impacts be developed. For additional information on the impacts or potential impacts that should be fully mitigated, see comments below (Section 6 and Section 7).

Page 3.1.5-3 includes a statement indicating that "*surface water sampling indicated that water chemistry between the upstream and downstream monitoring locations is generally consistent, while several results were elevated for the midstream monitoring point*". This statement is a misrepresentation of the water quality data presented in Table 3 of the Water Quality Evaluation Report, which clearly shows the presence of high levels of pollutants in the stormwater at the midstream sample location. This raises many questions, including the ability of the BMPs proposed at the project site to contain and treat as necessary these high levels of pollutants being discharged on the site during storm events, and to prevent for further potential water quality impacts downstream. Note that the downstream sample was taken on April 14,2020, a day with no rain and no runoff versus the midstream sample, which was taken on April 10, 2020 – a day with heavy rain and higher volumes of watershed runoff. The data provided demonstrates the need to verify that BMPs, structural or otherwise, would need to provide effective mitigation to water quality impacts, and continual stormwater and non-stormwater monitoring should be necessary.

Page 3.1.5-21 indicates that "*because the project would have less than significant impacts on water quality standards and waste discharge requirement violations, when combined with cumulative projects, impacts would not be cumulatively considerable*". For a project of this magnitude and given all the concerns provided by the Authority, a water district that depends on its ability to treat water originating in the Sweetwater River watershed, the Authority believes that a comprehensive water quality monitoring plan should be a requirement of this project, to indeed ensure that the mining operations do not negatively impact water quality.

Section 3.1.5-23 indicates that "*based on the analysis… no significant Project-specific or cumulative impacts related to hydrology and water quality would result from implementation of the Project*". The Authority is in disagreement with the conclusions of the analysis provided in the Hydrology and Water Quality section.

- Given the information provided in the DEIR, Drainage Study (Appendix O), and the information discussed above regarding the proposed berms, the project would result in project-specific impacts to hydrology, and potential cumulative impacts as this project could have an impact on the downstream areas and the

Sweetwater Reservoir. See Section 5 below for additional comments on impacts, the Drainage Study, and needed revisions to the DEIR.

- Given the information provided in the DEIR, Sediment Load Analysis (Appendix S) and Water Quality Evaluation (Appendix T), the project would result in project-specific impacts and could result in potentially cumulative impacts to water quality, including additional sedimentation and pollutant loads at Sweetwater Reservoir. For additional information on this, refer to Section 6 and Section 7 of this letter.

- the Authority believes that the proposed project could result in significant impacts to hydrology and water quality, and requests that mitigation measures be developed by the County and project proponent, and a Water Quality Mitigation and Monitoring Program be implemented throughout the duration of this project.

2.0 Hazards and Hazardous Materials Section

The Authority requests that further clarification as to the persistence of AggreBind in the environment is added to the DEIR. The information provided for AggreBind is vague, including the information provided in the safety data sheet (SDS).

If the AggreBind is stored in a 25-gallon drum, would there be any additional secondary containments provided to ensure spills that impact the environment do not occur?

The Authority requests that a Hazardous Materials Business Plan (HMBP), or similar document, be prepared and reviewed by the applicable regulatory agencies before any permits are granted to the project proponent by the County. Given the potential from the mining operation to impact the Authority's operations and water quality at Sweetwater Reservoir, the Authority requests being added as a reviewer of such plan, to ensure that emergency responses related to hazards being released from the project site fully mitigate impacts to water resources and the Authority's operations.

3.0 Project Description

3.1 Project Objectives

As noted in Section 1.1 of the DEIR's project description, the project has the two following objectives:

> Objective #4: maintain the existing low-flow channel of the Sweetwater River to accommodate water transfers from Loveland Reservoir to Sweetwater Reservoir, and

> Objective # 5: Widen the existing flood channel of the Sweetwater River to more closely mimic conditions prior to golf course construction.

The Authority appreciates the inclusion of objective #4 to the project's environmental review. Given the importance of Sweetwater Reservoir and the Authority's water transfers to the entire region, the Authority believes that the channel in the middle Sweetwater River watershed is to be protected at all costs from additional sources of potential pollution or from hydrologic modifications that could result in short-term or long-term water losses to the Authority.

As mentioned before in this letter, maintaining the existing low flow channel may not be enough to accommodate the flows created by water transfers and additional watershed runoff, as these water flows make their way through the proposed project site to Sweetwater Reservoir. The Authority and the County are aware that water transfers are just a portion of the water flowing through the site and ending at Sweetwater Reservoir for future treatment and distribution. The DEIR refers to flows of 358 cubic feet per second (cfs) that need to be accommodated (i.e. water transfer flows). However, this should be considered a major flaw of this project's environmental review that needs to be corrected and properly addressed, as significant additional flows from the upper areas in the Sweetwater River middle watershed typically occur at the same time when water transfers are being conducted. To add to the complexity of this issue, natural flows resulting from heavy storm events, such as atmospheric rivers, have clearly exceeded 358 cfs multiple times in the past, including significant flow events that did not include water transfers. The Authority suggests that the County and project proponent review historical flow data available from the Dehesa stream gauge located in the middle watershed of the Sweetwater River, upstream of the proposed project site. Flow data for the Dehesa stream gauge can be found at https://waterdata.usgs.gov/usa/nwis/uv?11016200. Historical flow data can provide some insights to the County and project proponent, with respect to flows that can be expected through the project site. This stream gauge is operated and maintained by the United States Geological Survey (USGS) and the Authority makes financial contributions to USGS to ensure its continued operation and maintenance. In addition to historical flow information available through the aforementioned website, the County and project proponent should consider 100-year storm events to properly analyze maximum flows that could pass through the project site, that may not be captured in the historical flow data available through the aforementioned website.

If this project moves forward, the protected channel must accommodate water transfers and significant storm events at any given time, and must not result in water losses to the Authority associated with the mining activities, or flooding of the mining site or reclaimed areas. The County and project proponent should revise this objective to ensure all runoff and flows reaching the mining site, including water transfers and runoff from other upstream locations, are protected by an engineered channel at all times. In addition, the

County and the project proponent should revise the technical analysis, as well as grading and reclamation plans to reflect this. As such, the following language is recommended to replace the existing language of objective #4:

> Objective #4: "maintain during and after mining operations a protected channel through the project site, to accommodate for water transfers from Loveland Reservoir to Sweetwater Reservoir, and any additional Sweetwater River middle watershed water flows resulting from significant storm events or natural watershed processes".

Objective #5 mentions the widening of the channel to mimic historic conditions of the river. Per the DEIR, it appears that this means flattening and widening the existing channel up to 300 feet wide in some areas; however, the engineering drawings appear to show that certain areas of the river would be widened to approximately 800 feet. While this objective may be well intended, it may also be in direct conflict with Objective #4, which requires a protected channel to prevent the impacts to the Authority's water transfers. As such, the County and project proponent should reconsider the feasibility of Objective #5, prioritize minimizing impacts to the Authority's operation and its water rights, and ensure that watershed runoff and water transfers reaching the site do not end up being diverted and flooding the mining site, resulting in significant hazards, water losses, and water quality issues.

3.2 Project design components

Page 1-2 of the DEIR indicates that the reclaimed river channel is expected to average approximately 250 to 300 feet in width and would be slightly higher in elevation than the existing low-flow channel. However, sheet 5 of Attachment A – Plot Plan shows that the river channel would be widened to approximately 800 feet in some locations. The text within the DEIR needs to be updated to match the proposed widening shown on the plot plan, or the scale shown on the plot plan should be corrected as necessary if the intent is to widen the river channel by no more than 300 feet.

Please refer to comments outlined in Sections 1.1, 1.2, and 1.3 of this letter regarding the Authority's additional comments on certain project design components.

4.0 Project Alternatives

The DEIR includes multiple project alternatives that claim to attain many of the project objectives, while minimizing the project's environmental impacts. The Biological Resources Avoidance Alternative (Alternative 2) is far superior to what the County and project proponent are presenting for certification as the preferred alternative. Alternative 2 includes a 50-foot mining setback from the river channel, which would greatly minimize potential impacts to hydrology, water quality, and the Authority's operations.

Additionally, the 500-foot mining setback included to protect the endangered least Bell's vireo not only benefits this protected migratory species, but it also creates additional distance between the Sweetwater Reservoir and the project site, which is desirable. Finally, Alternative 2 also reduces the time during which sand mining operations would be conducted to 6 years, instead of the proposed 10-12 years. With applicable revisions to the technical studies, grading plans, and the reclamation plan as indicated throughout this letter, and with the development of enforceable mitigation measures to fully protect water quality and the Authority's operations, this project may actually be able to minimize impacts if Alternative 2 is adopted.

The Authority is not against or in favor of mining operations upstream of Sweetwater Reservoir, as long as these operations do not result in impacts to water quality or the Authority's operations. Therefore, the Authority is extremely concerned with the proposed Cottonwood sand mining operation as currently presented in the DEIR, which does not provide the necessary mitigation measures and the appropriate engineering analysis to protect the Authority's water transfers. The Authority requests that the County and the project proponent revise the DEIR, technical documents, and the reclamation plan, in order to address the significant impacts or potential significant impacts to hydrology, water quality, and the Authority's operations identified in this letter. In addition, the Authority strongly encourages the County and the project proponent to reconsider Alternative 2 as the only feasible alternative for a mining site in the Sweetwater River floodplain, once the technical documents and reclamation plan are modified to incorporate the Authority's comments.

5.0 Drainage Study-Hydraulic Study (Appendix O)

The following comments address specific issues with the drainage study for the project. Comments herein would also need to be addressed in the applicable sections of the DEIR, including the Hydrology and water Quality section.

Page 2, Paragraph 2, indicates that "*a hydraulic goal is that the excavation will dominate over revegetation/restoration resulting in no increased 100-year water elevations on off-site areas, i.e., no-rise on off-site properties along the Sweetwater River*". If this "hydraulic goal" is not properly mitigated, this could potentially result in long-term water losses to Sweetwater Authority due to the creation of new ponding areas, evaporation, and infiltration. As currently described, the river channel would ultimately be widened up to 300 feet in some areas, although engineering drawings appear to show that some areas would be widened to approximately 800 feet. The amount of water being transferred between reservoirs, and additional watershed flows that would otherwise flow through the site with potential to be stored at Sweetwater Reservoir and treated for distribution, would be significantly lost to ponding and percolation. As noted in comments above, brief mention of construction of berms occur throughout the DEIR project description, Hydrology and Water Quality section, and this

drainage study, but there are no related engineering documents provided for the reviewers of this DEIR. Widening of the channel could result in a significant impact to the Authority's water supply, its operations, and ultimately, to the customers located in the Authority's service area. The drainage study and other project associated documents need to provide viable alternatives and mitigation measures to address this potential water loss issue.

Page 2, Paragraph 4 reads "*To ensure no significant mining impacts on water transfers during extraction activities, short berms can be constructed to separate the operations areas from the channel, as needed. The berm locations can be adjusted as mining progresses and should be set back from the mining so that they are not impacted by ongoing operations. Berms can also be incorporated upon final reclamation, where needed, to prevent significant impacts on water transfers. The project design and berming are intended to preserve the Authority's ability to transfer water from Loveland Reservoir to Sweetwater Reservoir.*" To reiterate, this study does not analyze or recognize the common eventuality of the Authority's water transfer flows being combined with natural watershed runoff flows that could exceed the suggested berm heights. The Authority is requesting that a revision be made to the document to address this concern. As noted in Sections 1.1 and 1.2 of this letter, the use of berms during and after mining operations to protect water transfers and water quality needs to be completely evaluated in the Drainage Study and the Reclamation Plan to ensure their effectiveness, and would need to prevent any water losses from occurring.

Page 3, paragraph 1; reads "*the conveyors shall also be anchored, as needed, during scheduled water transfers.*" Anchors shall not alter, divert, or impede water transfers or natural flows.

Page 3, paragraph 3; reads "*In fact, the extraction areas will provide detention and retention benefits during mining that will reduce off-site flow rates.*" The mining operations should not impact the Authority's water supply or operations. Any water detained at the site may be considered a potential water loss to the Authority, which is an impact to a public utility.

Page 4, paragraph 3; indicates *"Material stockpiles will be present during the mining phases."* Sediment stockpiles from mining could flow into Sweetwater River and end up in Sweetwater Reservoir if proper BMPs are not implemented. The Authority requests that BMPs be implemented around the sediment stockpiles, in accordance with an approved SWPPP, to prevent the sediments from the stockpiles from flowing into Sweetwater River.

Other matters that need to be addressed in the Drainage Study (or the reclamation plan) include the following:

- The analysis needs to explain how removal of alluvium from the mining site would affect groundwater infiltration and water transfers in the future.
- The analysis needs to incorporate hydraulic infiltration capacity of the site for future, proposed conditions.
- The analysis needs to calculate water losses to the Authority resulting from the widening of the channel and excavation of mining pits.

As discussed throughout this letter, further analysis will be required to quantify proposed final basin capture of transfers or natural flows with regard to the construction of berms, but also to quantify for potential water losses to the Authority resulting from the mining operations or reclamation of the area. The Authority would seek a reimbursement agreement for transferred and naturally occurring flows detained and retained during mining or water loss during the reclamation phase of the project. The Authority requests that the County does not approve this project until such agreement between the Authority and the mine owner has been executed.

For additional comments on the Drainage Study, please refer to the comments provided above regarding Alternative 2 and the "project design components" that need to fully mitigate impacts to water quality, hydrology, and the Authority's operations.

6.0 Sediment Load Analysis (Appendix S)

The Authority has the following comments regarding the Sediment Load Analysis:

The Sediment Load Analysis does not have an introduction or a background section, and does not include what the main purpose of this sediment load analysis is. For background, the Authority commented during the circulation of the IS and.NOP that

> *"A list of substances and materials ("pollutants of concerns") that are proposed to be used as part of the Project that have the potential to pollute soils, waterways, groundwater, and the Sweetwater Reservoir. Impacts from pollutants of concern should also be analyzed as part of the Project's environmental review. Furthermore, the Authority requests that a pollutant load analysis be conducted as part of the environmental review process to better understand the potential impacts to water quality (Authority, 2019)."*

EnviroMINE Inc., the consulting firm representing the project proponent, shared with the Authority an initial draft of the Water Quality Evaluation (draft WQE) and Work Plan prepared by Geo-Logic, dated January 2020. This document included the following language:

> *"a pollutant load analysis and report is proposed to address a comment from the Authority to better understand the potential impacts to water quality from the project. GLA proposes to conduct a Pollutant Load Analysis to estimate potential impacts of sediment erosion to the Sweetwater Reservoir for three scenarios: (1) temporary lack of BMP maintenance; (2) major storm events and resulting river flows, and (3) routine Loveland reservoir releases.*
>
> *For each scenario, standard analytical surface-water modelling methodologies will be used to estimate sediment and sediment-bound pollutant loading to the river channel, distribution of sediments and pollutants within the river downstream, and potential settling in Sweetwater Reservoir. Sediment loading will be estimated based on predicted stormwater flow rates, exposed soil surface area, and Site soil properties (e.g., methods of Banzai and Hayase, 1993). Distribution of sediments in the river (i.e., including silt, clays, and organic materials) downstream will be estimated based on river flow rates, soil properties, sediment loading rates and sediment settling. If sediments are predicted to reach Sweetwater Reservoir (e.g., under major storm events), sediment settling and pass-through will be evaluated based on reservoir properties (e.g., area, depth) and flow rates (Chapra, 1997). Concentration of pollutants in eroded sediments will be based on soil sampling described above. The results of this analysis will be summarized and presented in a technical report (Geo-Logic 2020, unpublished draft)."*

The Authority appreciates coordination with the County during the preparation of the scope of this document. The Authority has the following comments:

> It appears that the ponds located upstream of Sweetwater Reservoir, as shown in Figure 2, are considered throughout the study as a place where sediments would deposit and thus not reach the reservoir and not result in an impact to water quality at the reservoir. This is a false assumption as these ponds are not upstream of the reservoir, but located within the highwater mark of the reservoir, and thus part of the reservoir. The sediment load analysis needs be reassessed in order to re-evaluate its estimates and conclusions. In addition to this, the Authority objects to the term "sedimentation pond", as it pre-supposes the use of this pond as some type of BMP. These areas are managed both for habitat and for water resources purposes, and cannot be considered sedimentation ponds or

a mitigation measure for a mining project located upstream of the drinking water reservoir.

Per Table 5, if 33% of fine clays and silt erode from the site and end up at the reservoir, that could result in approximately 8.3 tons per year of suspended sediments (not including sands) reaching Sweetwater Reservoir during Phase 1 only. This is a serious water quality concern and could significantly increase turbidity, suspended solids, and sedimentation in Sweetwater Reservoir. The Authority requests that the County and other regulatory agencies do not provide permits for the Project until the Project implements appropriate mitigation measures and a mitigation and monitoring reporting program.

Similarly, current conditions at Cottonwood yield approximately 2.2 tons per year of sediment loading into the Sweetwater River. For Phase 1 alone, sedimentation is expected to increase from 0.71 tons per year to 25 tons per year. This is a water quality concern to the Authority that would increase turbidity and sedimentation in the Sweetwater River, making water more difficult and expensive to treat, and this potential erosion and sedimentation issue needs to be properly mitigated at the source.

Sediment and suspended fines entering the Sweetwater River and Sweetwater Reservoir contain chemical pollutants. Table 6 in the Report provides pollutant loading estimates associated with the Cottonwood Sand Mining Project, as analyzed in the Sediment Load Analysis Report. Per the report, under severe storm runoff conditions, converting to kilograms, the most impactful pollutants entering Sweetwater Reservoir would be as follows:

Total Organic Carbon (TOC) = 21.7 kg/year
Total Phosphorus = 2.3 kg/year
Total Nitrogen = 1.45 kg/year
Iron = 75 kg/year

Any additional loading of nutrients such as total nitrogen and total phosphorus into Sweetwater Reservoir would further increase the potential for nuisance algae blooms, which could increase the cost of mitigating for taste and odor and cyanotoxins in the reservoir and at the Perdue Water Treatment Plant. Increases in loading of TOC into Sweetwater Reservoir could cause increases in the use of coagulant chemicals at the Perdue Plant, which could also increase the cost of treating water. Any increase in the concentration of iron in Sweetwater Reservoir or in the sediment in the reservoir, could potentially contribute, during certain times of the year, to an exceedance of the Title 22 secondary standard for iron.

The document does not include metals data provided for manganese, which is a major concern in the sediment in Sweetwater Reservoir. If available, predicted loading rates for manganese should be included in the Report. Increases in manganese could also contribute to incremental increases in chemical oxidant usage at the Perdue Plant.

The last column of "Table 6 – Pollutant Loading Estimate" should be reformatted, and instead of showing estimated quantities in scientific notation, it should show them in decimal notation to better display to all document reviewers of all backgrounds the amount of incremental pollution estimated at Sweetwater Reservoir as a result of the proposed project, if unmitigated.

7.0 Water Quality Evaluation (Appendix T)

Table 3 of Appendix T does not include analysis results for Oil & Grease, although it is listed in Table 1 of the same document.

The Total Dissolved Solids (TDS) data for the upstream (350 mg/L) and midstream (280 mg/L) sites appear to be incongruent with their respective conductivity values of 3.71 mS and 4.64 mS, respectively. The Authority requests that the County and project proponent revisit this data and provide revised data as necessary.

The midstream sampling event occurred on April 10, 2020 during a major storm runoff event (0.72 inches of rain). Many pollutants were detected above their regulatory standards (refer to the table below). This water quality data demonstrates the vulnerability of the Cottonwood project site to high levels of pollutants during major storm events, with a large contribution of stormwater runoff from Mexican Canyon.

The Authority recommends that the County and the project proponent develop a more comprehensive monitoring plan to properly evaluate potentially significant water quality impacts to the Sweetwater River and Sweetwater Reservoir (for the constituents listed below that have exceeded their regulatory benchmarks). Currently, the Industrial General Permit (IGP) only requires stormwater analysis of pH, TSS, Oil & Grease, and nitrate and nitrite.

In addition to the contaminant monitoring required by IGP, the Authority recommends the County and project proponent develop a mitigation measure that requires quarterly monitoring at the upstream, midstream, and downstream Cottonwood Project site sampling locations, to adequately capture both stormwater events and dry weather flows for the duration of the Cottonwood Sand Mining Project.

Implementing a more robust monitoring regime is the only scientific way that would support the effectiveness of any of the BMPs proposed by the project proponent. BMPs on the proposed project shall be effective in preventing pollutants, sediment, and clay fines from impacting the Sweetwater River and Sweetwater Reservoir.

As a check on potential impacts to groundwater quality, the Authority recommends annual monitoring for the analytes and sites listed in Table 4 of the Water Quality Evaluation Report (Nov 2021 Rev).

Midstream Pollutants Exceeding Regulatory Benchmarks

Parameter	Concentration	Regulatory Standard	Exceedance Factor/Comments
Turbidity (NTU)	>800	20 (San Diego Basin Plan (BP))	40X
Total Nitrogen-N (mg/L	5.1	1.0 (BP); assuming a 10:1 N:P ratio	5X
Total Organic Carbon (mg/L)	33	Not Available	Approximately 3X normal Sweetwater Reservoir Concentration
Total Phosphorous-P (mg/L)	1.0	0.1 (BP)	10X
Total Suspended Solids (TSS) (mg/L)	2400	Not Available	Approximately 120X normal Lower Sweetwater River Concentration
Lead (mg/L)	0.023	0.015 (CA Primary MCL)	1.5X
Manganese (mg/L)	0.91	0.05 (CA Secondary MCL)	18X
Iron (mg/L)	21	0.3 (CA Secondary MCL)	70X
Vanadium (mg/L)	0.12	0.05 (CA Notification Level)	2.4X

Conductivity (mS/cm)	4.64	1.6 (CA Secondary MCL)	2.9X

8.0 Comments on Reclamation Plan

The proposed grading shown on cross-section A-A' on sheet 7 of the plot plans appears to impede the flow of water towards Sweetwater Reservoir. The proposed mining activities shall not interfere with water flows to Sweetwater Reservoir. Also, the final configuration of the riverbed will be much wider than the existing riverbed channel. This will most likely result in more water being infiltrated into the ground and less water reaching Sweetwater Reservoir. The proposed riverbed final configuration cannot have a negative effect on the river's ability to convey water to Sweetwater Reservoir. The plot plans or project specifications need to indicate what types of materials and gradation will be used to fill the over excavated areas in the river. Indicate what grading practices will be implemented to key in the proposed reclamation areas onto the existing slopes. If reclamation areas are not keyed in properly onto the existing slopes, backfill materials could erode or get washed away by flowing water and impact water quality in Sweetwater Reservoir.

Also, the reclamation plan/plot plan does not show the proposed temporary berms during construction and the permanent berms after reclamation discussed in the DEIR. Please refer to Sections 1.1, 1.2, and 5.0 above regarding additional comments on this matter.

In addition, the Reclamation Plan circulated with the DEIR includes an operating procedure that would be followed by the mine operator and the Authority, whenever a water transfer is to occur (Attachment D of the Reclamation Plan). Authority staff indicated on an email dated March 4, 2020 to EnviroMINE staff that the Authority would not provide comments on the Operating Procedure until mitigation measures were reviewed by Authority staff, as part of the environmental review process. Once appropriate mitigation measures are developed for the mining site as described throughout this letter, and agreements are being processed between the project proponent and the Authority, the Authority will continue to discuss this Standard Operating Procedure with the County and the project proponent.

9.0 Permit Type / Action – Sweetwater Reservoir Urban Runoff Diversion System Fee

If this project moves forward, the Authority requests that a condition be placed on the subject project to require the owner to submit satisfactory evidence to the County, stating that the owner has complied with *Resolution 84-8 As Amended.* Complying with

this condition should be required prior to issuance of any permit pursuant to a Major Use Permit. On May 8, 1985, the County Board of Supervisors took action that required the County to place conditions on development proposals within a designated area of the Sweetwater River Watershed to the satisfaction of the Authority, as provided in *Resolution 84-8*. Since the Board of Supervisors 1985 action, discretionary Project approvals within the designated watershed area have complied with this condition. The resolution provides for the collection of urban runoff protection fees from all developments within the Sweetwater Reservoir drainage basin to pay for a portion of the Sweetwater Reservoir Urban Runoff Diversion System.

10.0 Conclusion

The Authority appreciates the opportunity to review and comment on the DEIR and is willing to continue to work with the County and the project proponent to ensure that the Sweetwater Reservoir is not impacted by, and that water losses to the Authority do not occur, as a result of this project. Authority staff look forward to the discussion and development of solutions that will fully mitigate impacts or potential impacts to water quality and the Authority's operations.

If you have any questions, do not hesitate to contact Erick Del Bosque, Interim Director of Engineering, at 619-409-6752 or edelbosque@sweetwater.org, or Israel Marquez, Environmental Project Manager, at 619-409-6759 or imarquez@sweetwater.org.

Sincerely,

Carlos Quintero, P.E.
General Manager

CQ:IM:ah

cc: Mr. David Gibson, California Regional Water Quality Control Board
Mr. Eric Becker, California Regional Water Quality Control Board
Mr. Sean Sterchi, Water Resources Control Board, Division of Drinking Water
Mr. Bill DiBiase, Water Resources Control Board, Division of Drinking Water
Ms. Kelly Fisher, California Department of Fish and Wildlife
Ms. Jill Terp, U.S. Fish and Wildlife Service
Mr. Dwane Binns, U.S. Fish and Wildlife Service
Mr. Kyle Dahl, U.S. Army Corps of Engineers

County of San Diego, Clerk of the Board of Supervisors

County of San Diego, Supervisor Vargas
Valle De Oro Community Planning Group

Ms. Roxanne Gores, Community Member
Ms. Lessa Ritzma, Community Member

Ms. Jennifer Sabine, Sweetwater Authority
Mr. Erick Del Bosque, Sweetwater Authority
Mr. Justin Brazil, Sweetwater Authority
Mr. Mark Hatcher, Sweetwater Authority
Mr. Israel Marquez, Sweetwater Authority

OFFICIAL RECORD
Clerk of the Board of Supervisors
County of San Diego

Exhibit No. H

Meeting Date: 09/10/2025 Agenda No. 06

Presented by: Sierra Club

SIERRA CLUB SAN DIEGO

- Over 12,000 members in San Diego & Imperial Counties
- Oldest and largest environmental organization in the country
- Defending everyone's right to a healthy world

Lisa Ross, Chapter Chair
Ron Askeland, Conservation Chair
Mark West, Chapter Director
Charles Rilli, Conservation Organizing Manager
Peter Andersen, Conservation Vice-Chair

SIERRA CLUB
SAN DIEGO CHAPTER

Explore, Enjoy and Protect the Planet

1

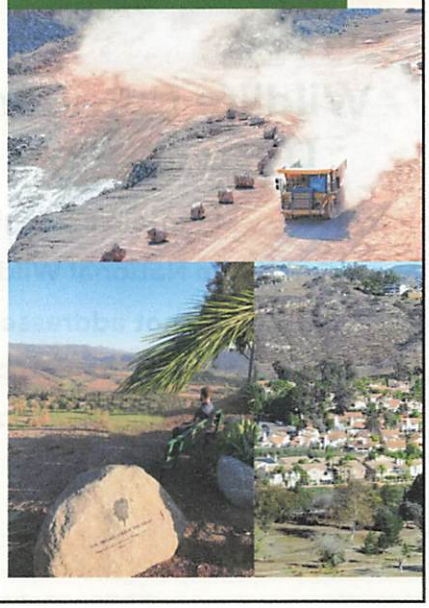
Wrong Project...Wrong place

01 **Cottonwood Wildlife Corridor**

02 **Endangered Species**

03 **Air Quality, Noise**

04 **Sweetwater River Watershed**



2

Destroy To Restore?

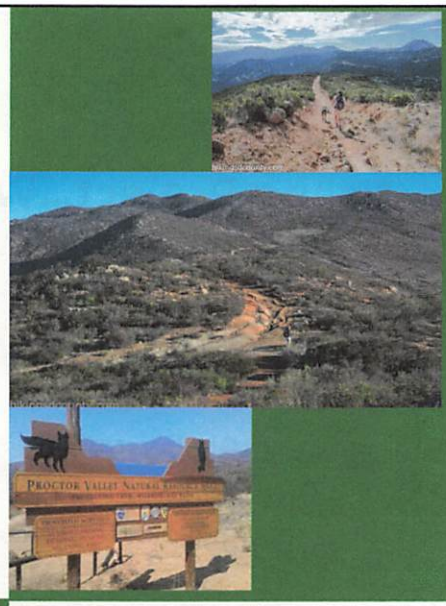
- Restoration vs. natural habitat
- Phased restoration won't work
- Biological value lost for a decade
- Sources of back fill?



3

Wildlife Corridor Destruction

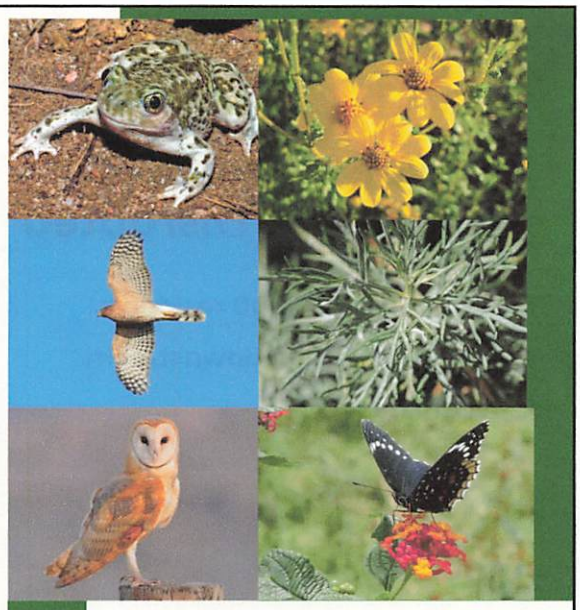
- McGinty Mountain Ecological Reserve & San Diego National Wildlife Refuge
- Vital linkage not addressed in EIR
- 10 to 12-year reclamation before connection is fully reestablished



4

Endangered Species Further Threatened

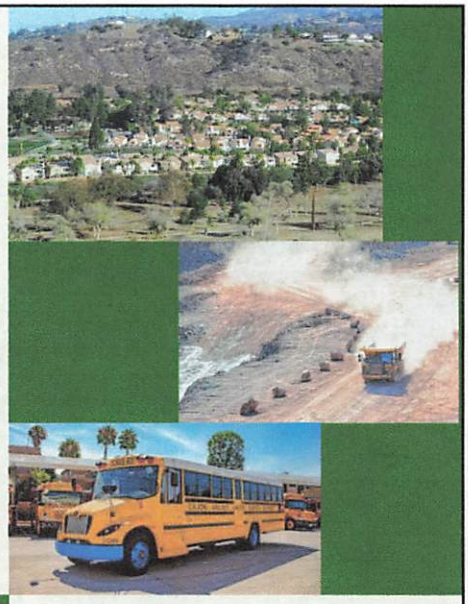
- Breeding & foraging disrupted
- Plants, Reptiles, Migratory Birds, Amphibians, Bats, Butterflies
- Mitigation unworkable



5

Noise & Water Pollution

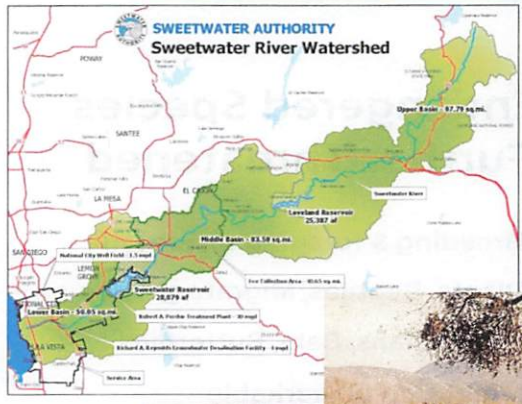
- Noise Pollution
- Air Quality: Fugitive Dust Impacts
- Elementary schools, homes nearby

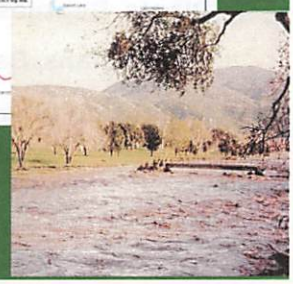


6

Sweetwater River: Watershed Disrupted

- **230 miles, 300,000 residents**
- **Water Pollution downstream**
- **Wetlands**

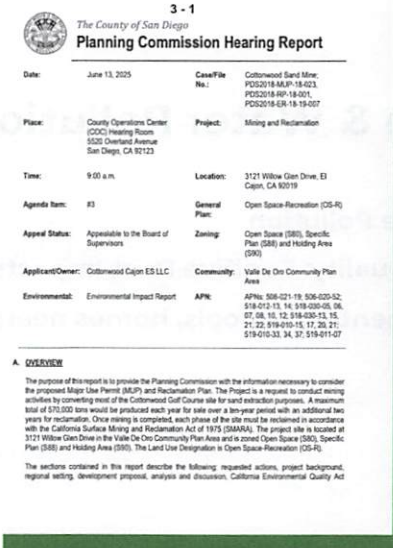




7

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

- Staff Report



3 - 1

The County of San Diego

Planning Commission Hearing Report

Date:	June 13, 2025	**Case/File No.:**	Cottonwood Sand Mine; PDS2018-MUP-18-023, PDS2018-RP-18-001, PDS2018-ER-18-19-007
Place:	County Operations Center (COC) Hearing Room 5520 Overland Avenue San Diego, CA 92123	**Project:**	Mining and Reclamation
Time:	9:00 a.m.	**Location:**	3121 Willow Glen Drive, El Cajon, CA 92019
Agenda Item:	#3	**General Plan:**	Open Space-Recreation (OS-R)
Appeal Status:	Appealable to the Board of Supervisors	**Zoning:**	Open Space (S80), Specific Plan (S88) and Holding Area (S90)
Applicant/Owner:	Cottonwood Cajon ES LLC	**Community:**	Valle De Oro Community Plan Area
Environmental:	Environmental Impact Report	**APN:**	APNs: 506-021-19; 506-020-52; 518-012-13, 14; 519-030-05, 06, 07, 08, 10, 12; 518-030-13, 15, 21, 22; 519-010-15, 17, 20, 21; 519-010-33, 34, 37; 519-011-07

A. OVERVIEW

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

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

8

OFFICIAL RECORD
Clerk of the Board of Supervisors
County of San Diego

Exhibit No. I

Meeting Date: 09/10/2025 Agenda No. 06

Presented by: Jennifer Lynch, James DeCarlis, Maddy Kilkenny

Cottonwood Sand Mine Project

Applicant's Board of Supervisors Presentation

September 10, 2025

Requested Actions: Grant Appeal

1. Find and determine the Project complies with CEQA, the County RPO, and the County WPO
2. Certify the Final EIR and adopt the CEQA Findings of Fact, including the Statement of Overriding Considerations
3. Adopt the Mitigation Monitoring and Reporting Program
4. Grant MUP PDS2018-MUP-18-023 and Reclamation Plan PDS2018-RP-001, make the findings, and impose the Conditions of Approval presented in the Form of Decision

History of the Cottonwood Project Site

1950s: Sand mining begins on the site

1960s: Golf course construction, mining continues, Sweetwater River confined to a narrow, artificial channel

1970s: Sand mining continues, gravel pit

2007: Additional sand mining

2009: Additional sand mining

2016: Additional sand mining

Source: FEIR Appendix E: Historic Resources Evaluation Report for Cottonwood Sand Mine Project (2020)

Robust Environmental and Planning Review Process

Extensive environmental review

No question extraction an allowable use under the site's General Plan and Zoning designations

No other suitable location for extraction of much needed PCC-grade aggregate sand

Dispelling Misconceptions

Sand mining is not rock mining

No residential area is exposed to mining for the life of the project

No mining within the river channel

No impact to the ability of the river channel to convey water

No record or evidence of any significant cultural resource located on the site

Starting on day 1:

VMT and associated emissions are reduced

Dependance on imported aggregate falls

Construction costs reduced

County sales tax revenues increase

Water use significantly reduced

At Project Completion:

County obtains 148 acres of new, pristine, perpetually protected open space

Sweetwater River channel is improved

Riparian habitat and wildlife connectivity is improved

Flood protection is improved

County has received at least $2.5 million in sales tax revenue

Water consumption onsite reduced to 0% of current demand

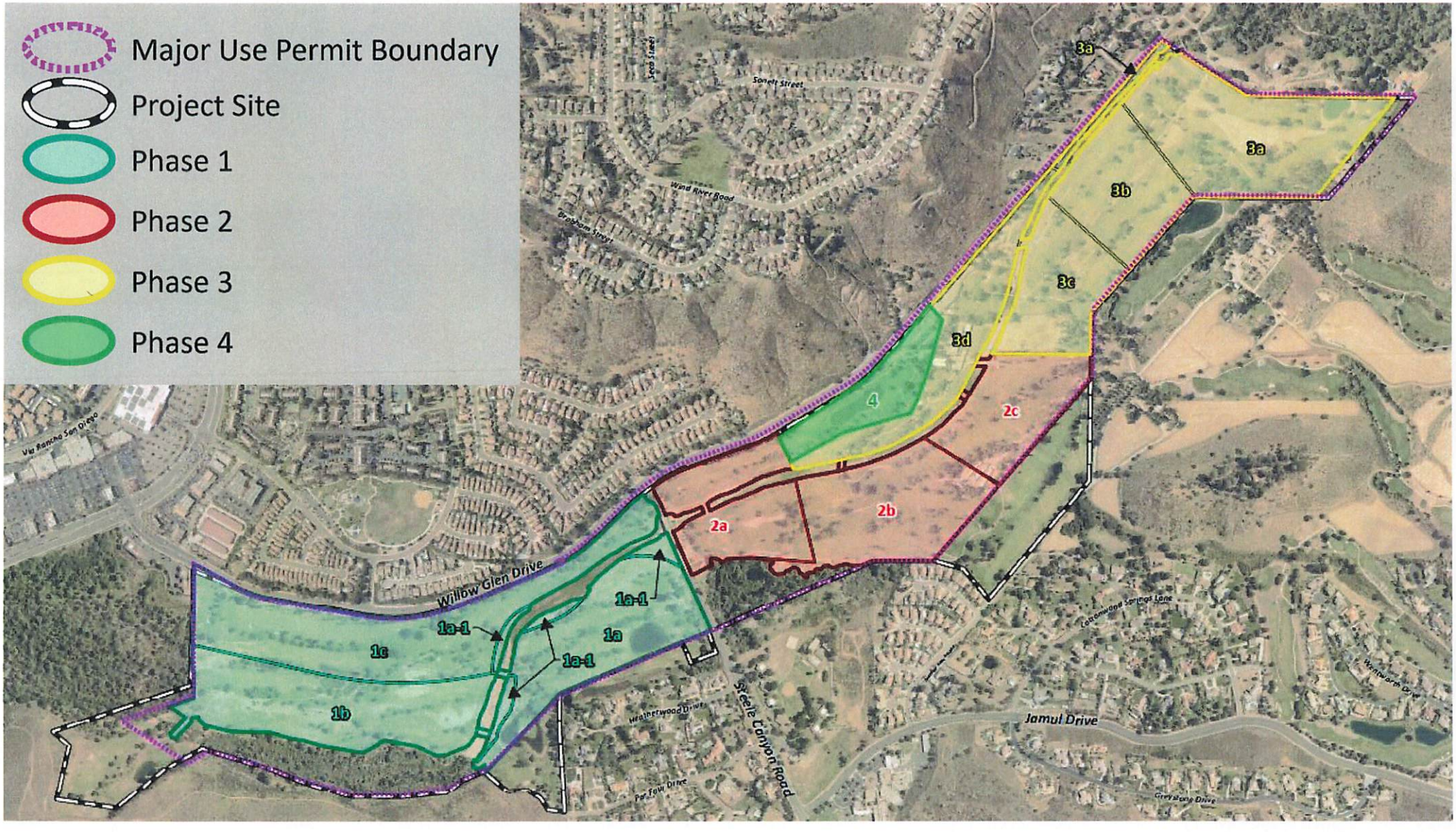
Notable Conditions of Approval

MUP GEN#4 and GEN#7: Land Dedication Offer

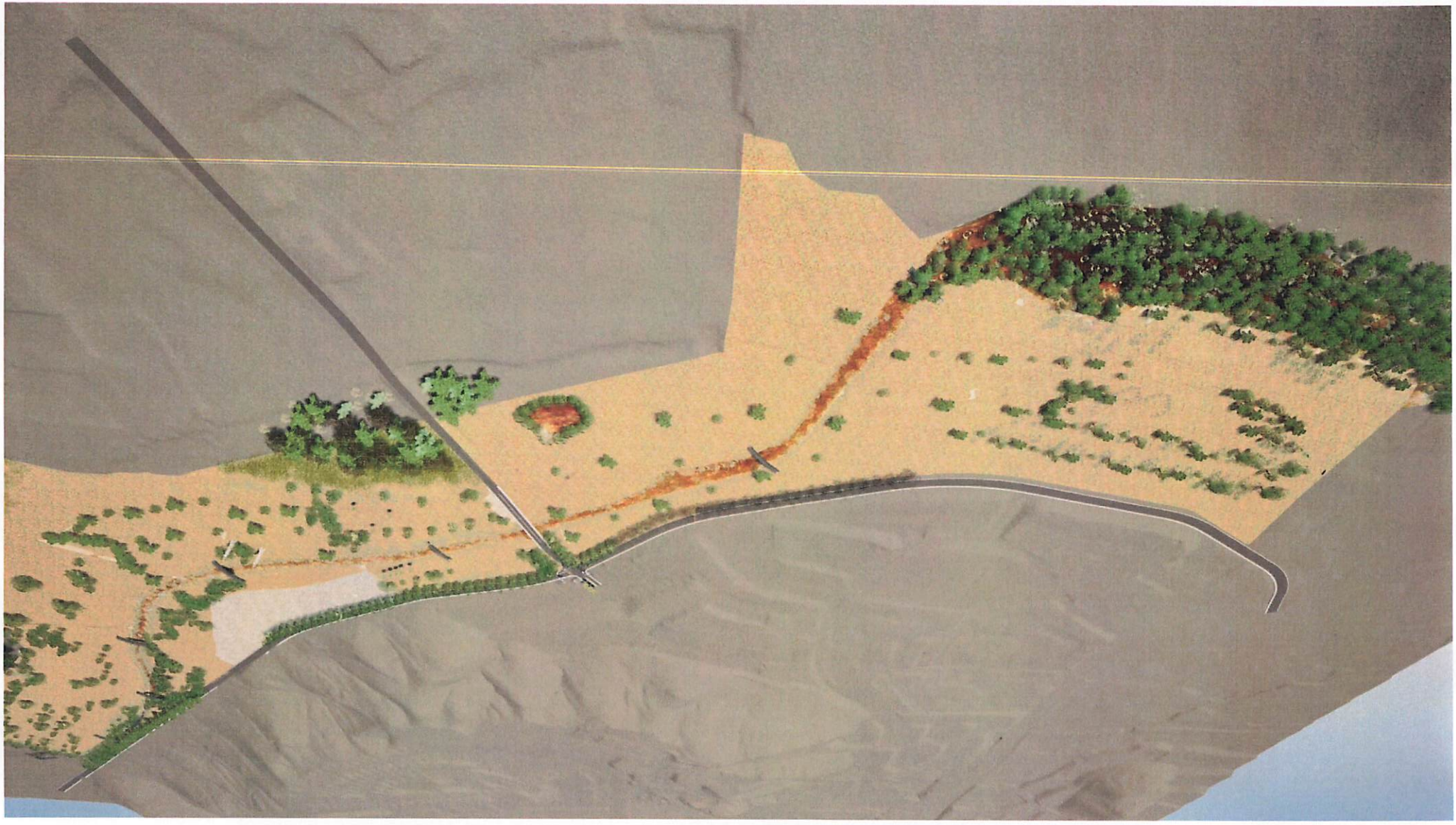
MUP GEN#5: Permit **Only** for 10 Years

RP GEN#7, BIO#4, BIO#6: Financial Assurances

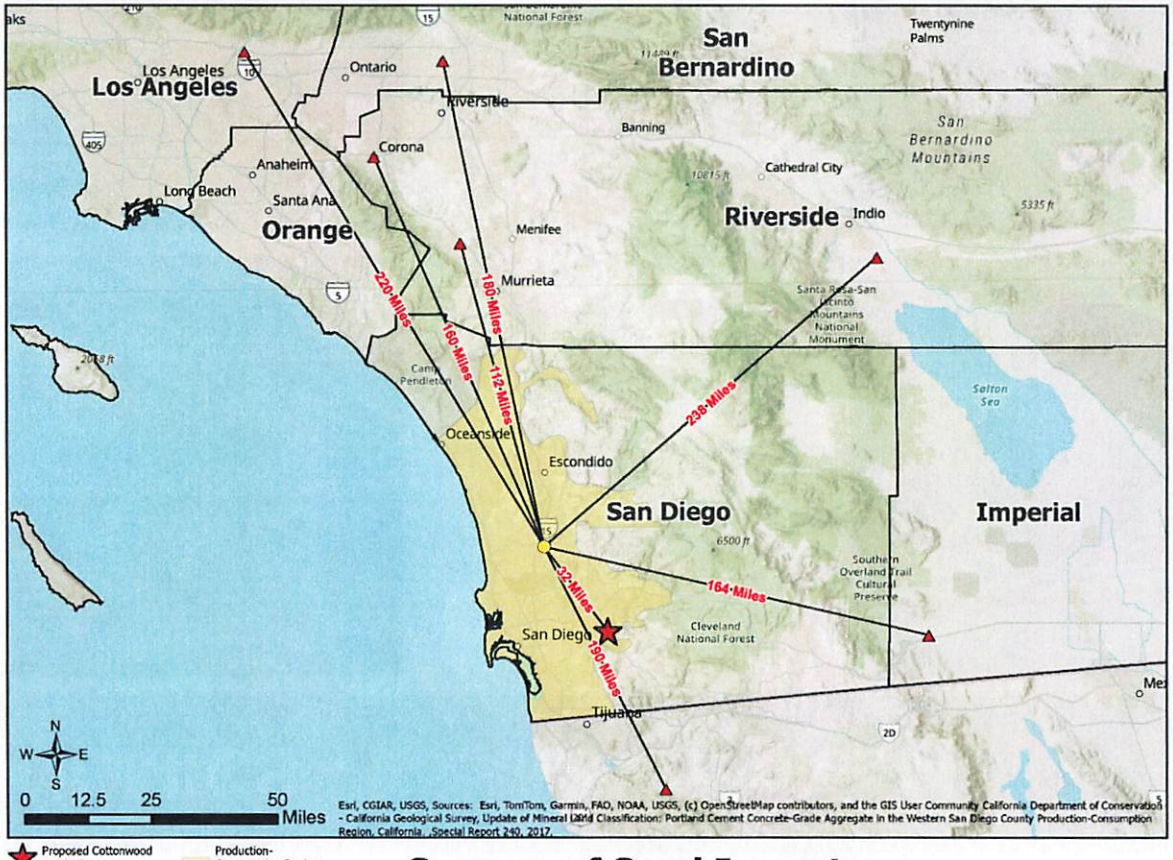
RP ROADS#9 and #10: Haul Route Plan and Road Repair



Major Use Permit Boundary
Project Site
Phase 1
Phase 2
Phase 3
Phase 4
3a
3b
3c
3d
4
2a
2b
2c
1a
1a-1
1b
1c
Willow Glen Drive
Jamul Drive
Steele Canyon Road
Sonett Street
Wind River Road
Via Rancho San Diego
Heatherwood Drive
Par Four Drive
Greystone Drive
Wentworth Drive



SAND ECONOMICS – The Cost of Transportation



Sources of Sand Imports

SAND ECONOMICS – Local Examples









SAND ECONOMICS – Local Examples





4 X Cost





CEQA FINDINGS



Reduce aggregate truck trips by 44%
Total reduction of 1.5M trips a year



Reduce water consumption by 80%
Eliminate pollutants into Sweetwater River Channel
Improve Sweetwater River Channel condition



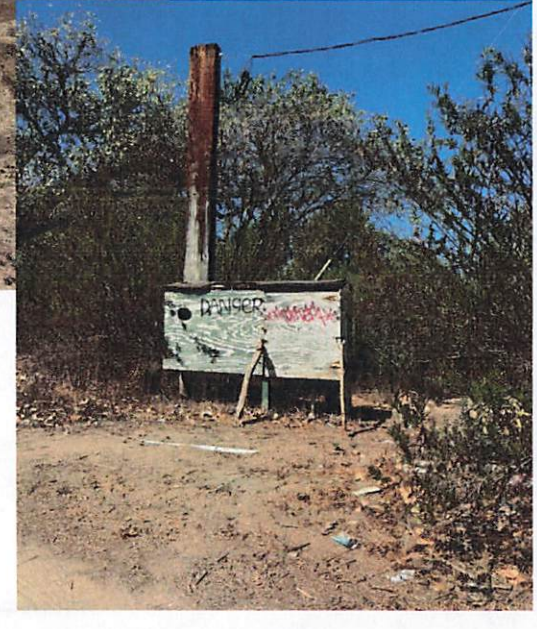
No increase in cancer risk
Fugitive Dust Control Plan & Best Practice implementation

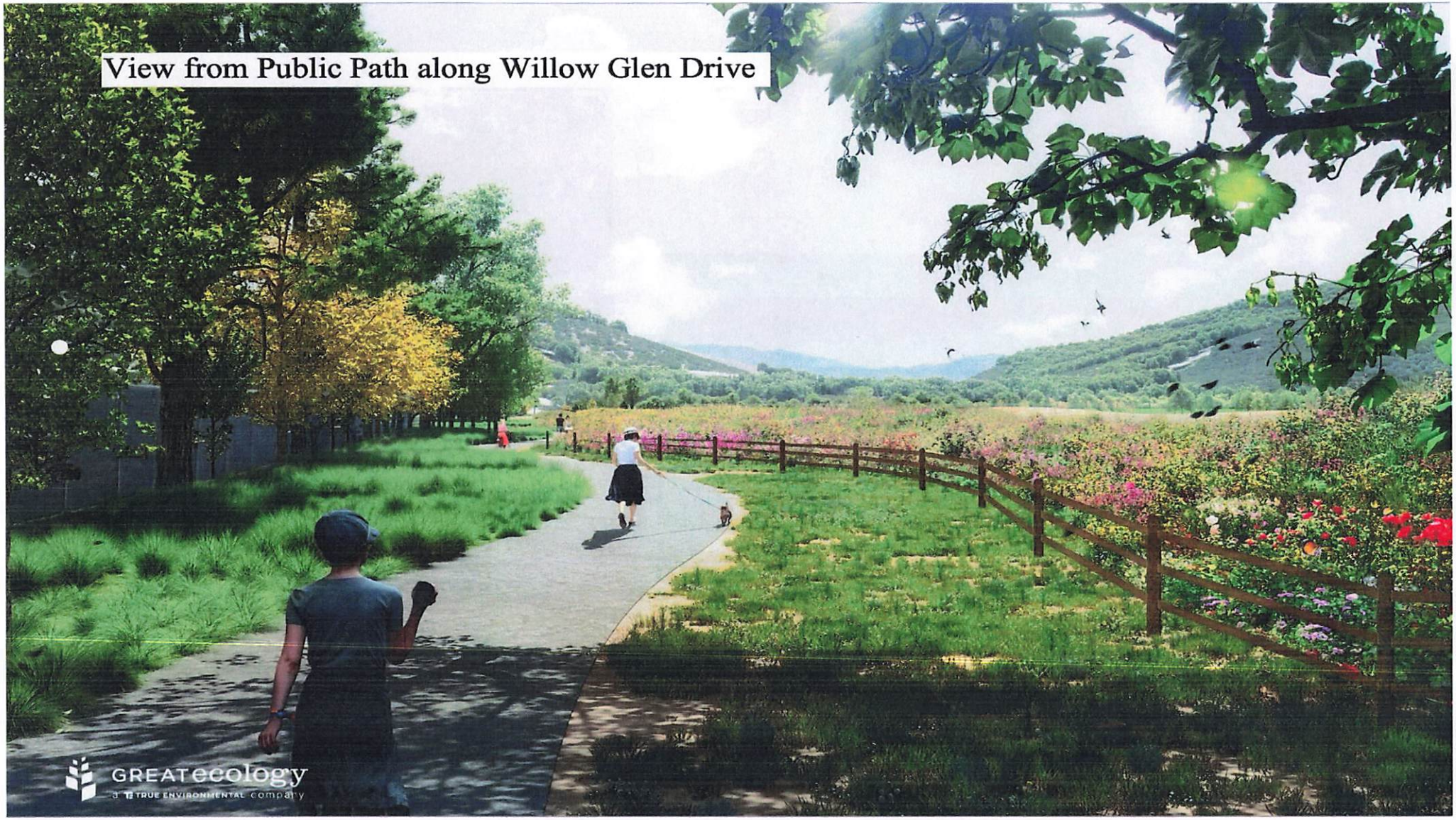
CURRENT CONDITIONS

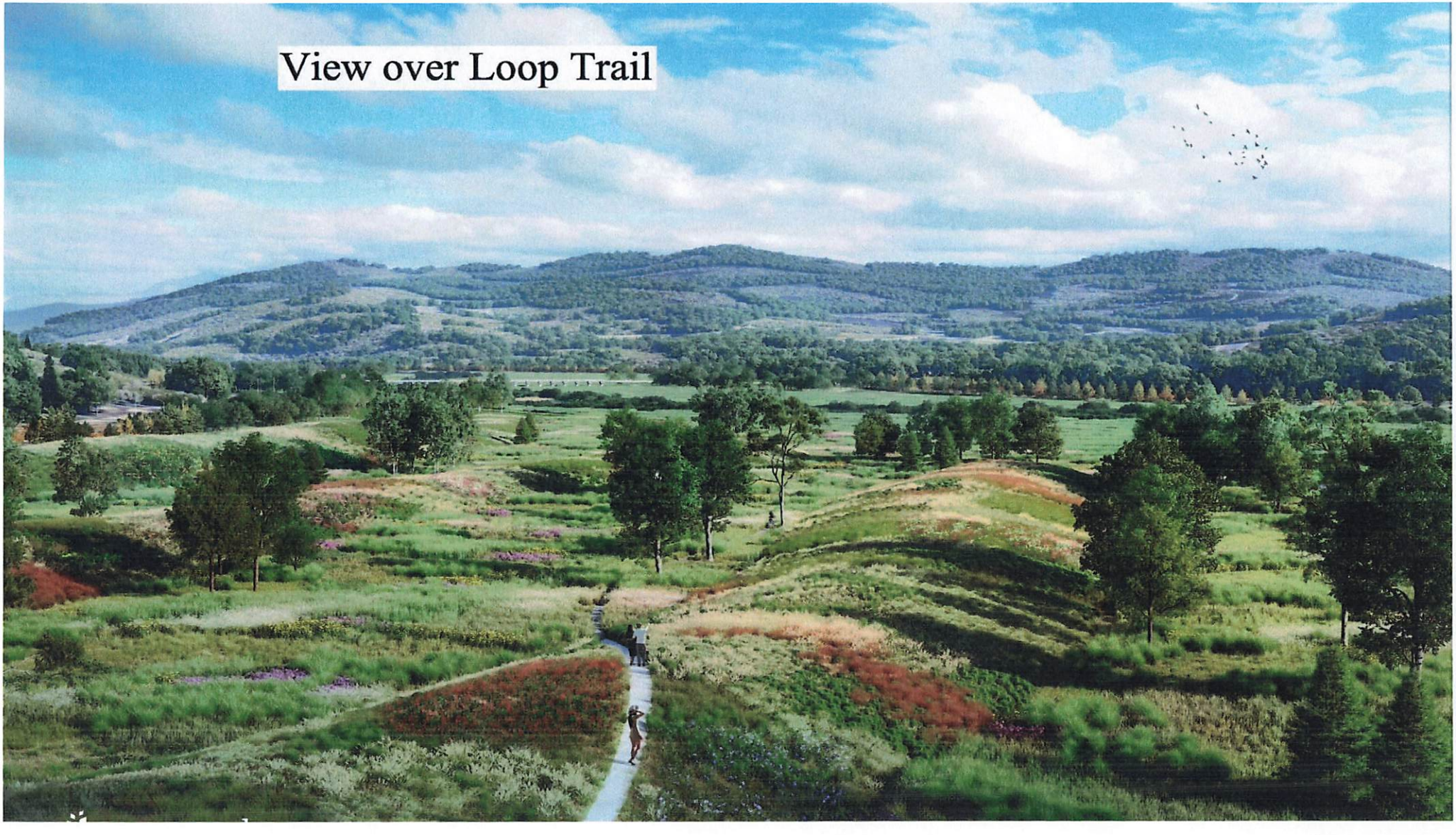


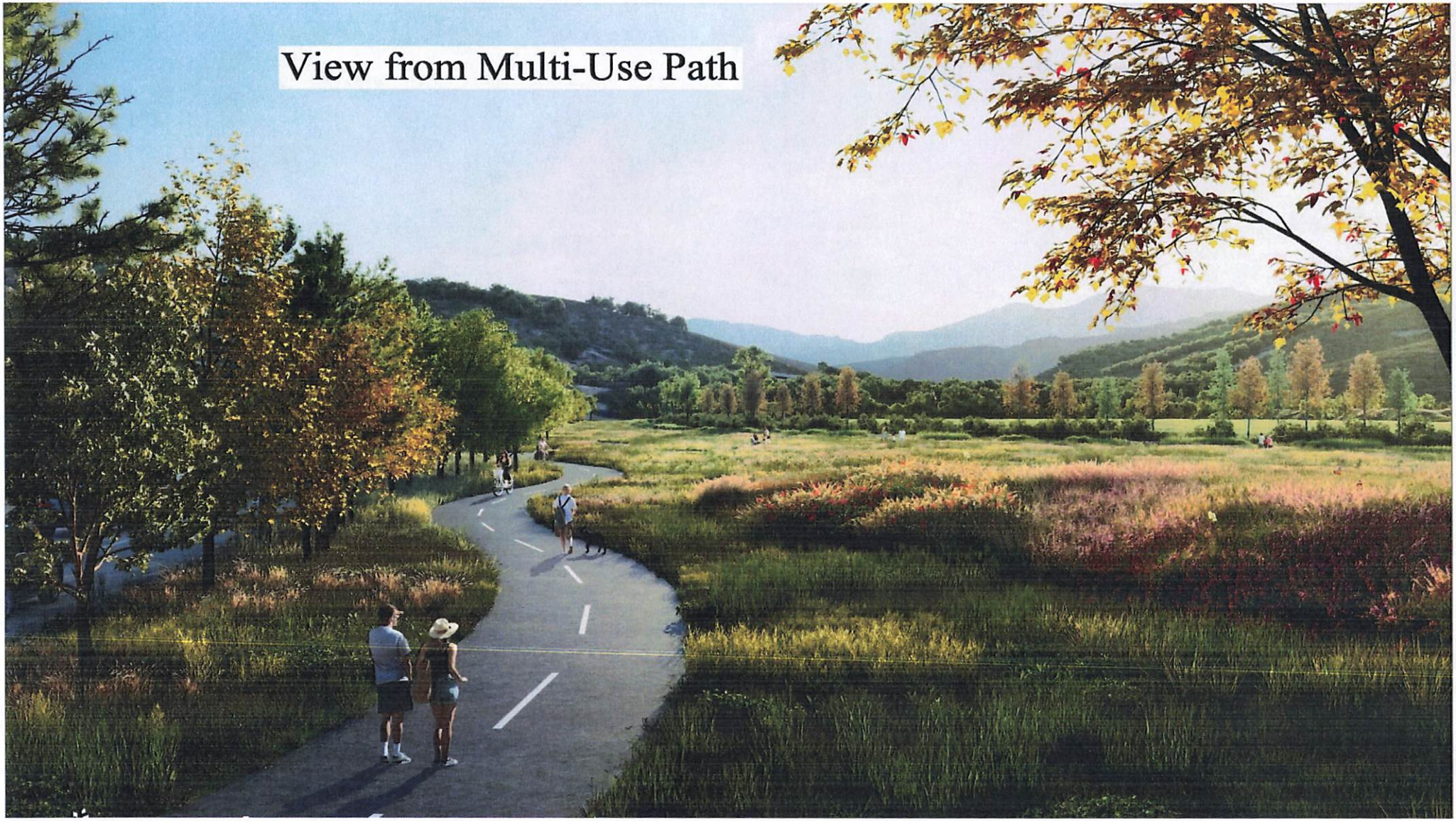


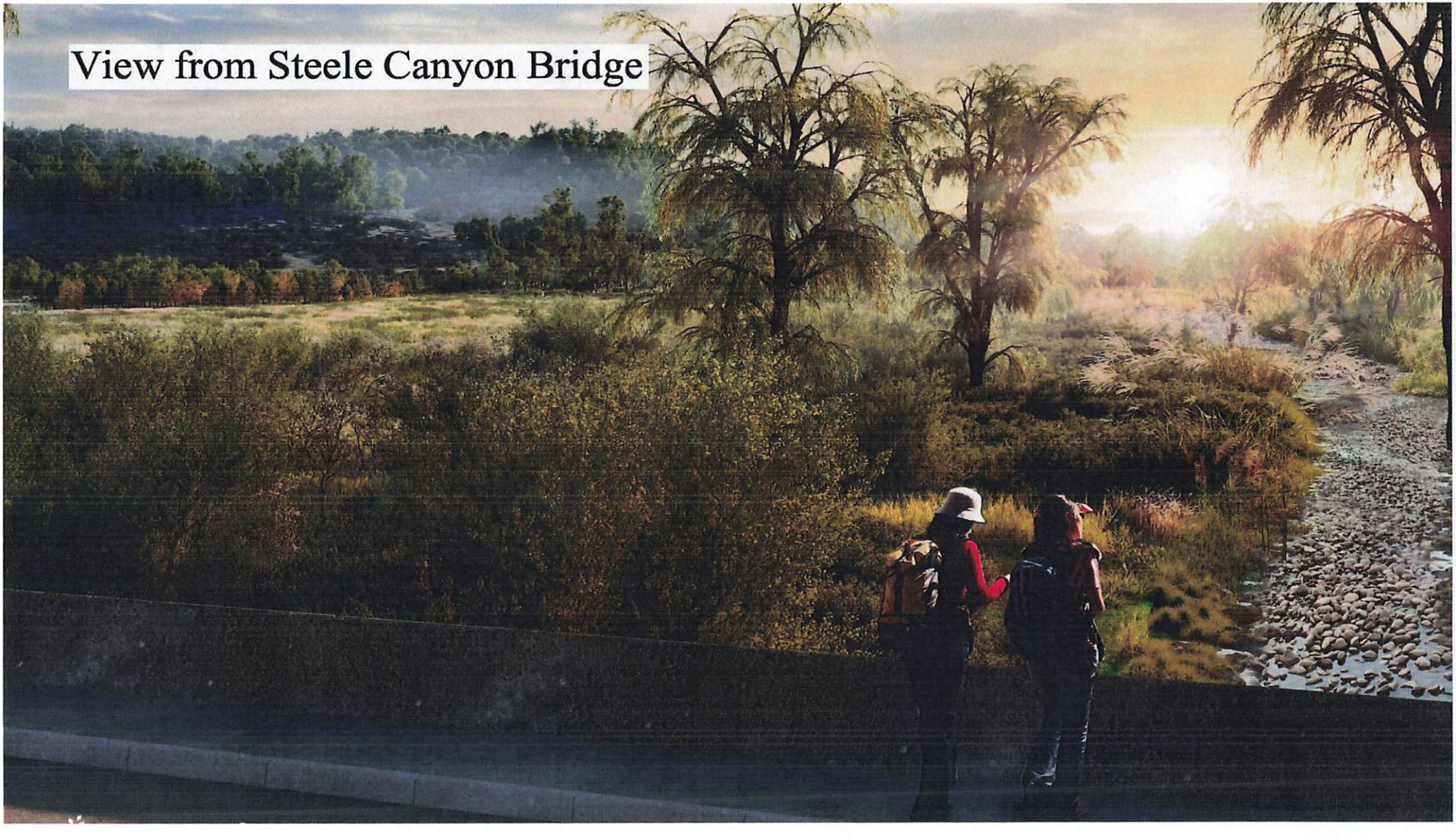


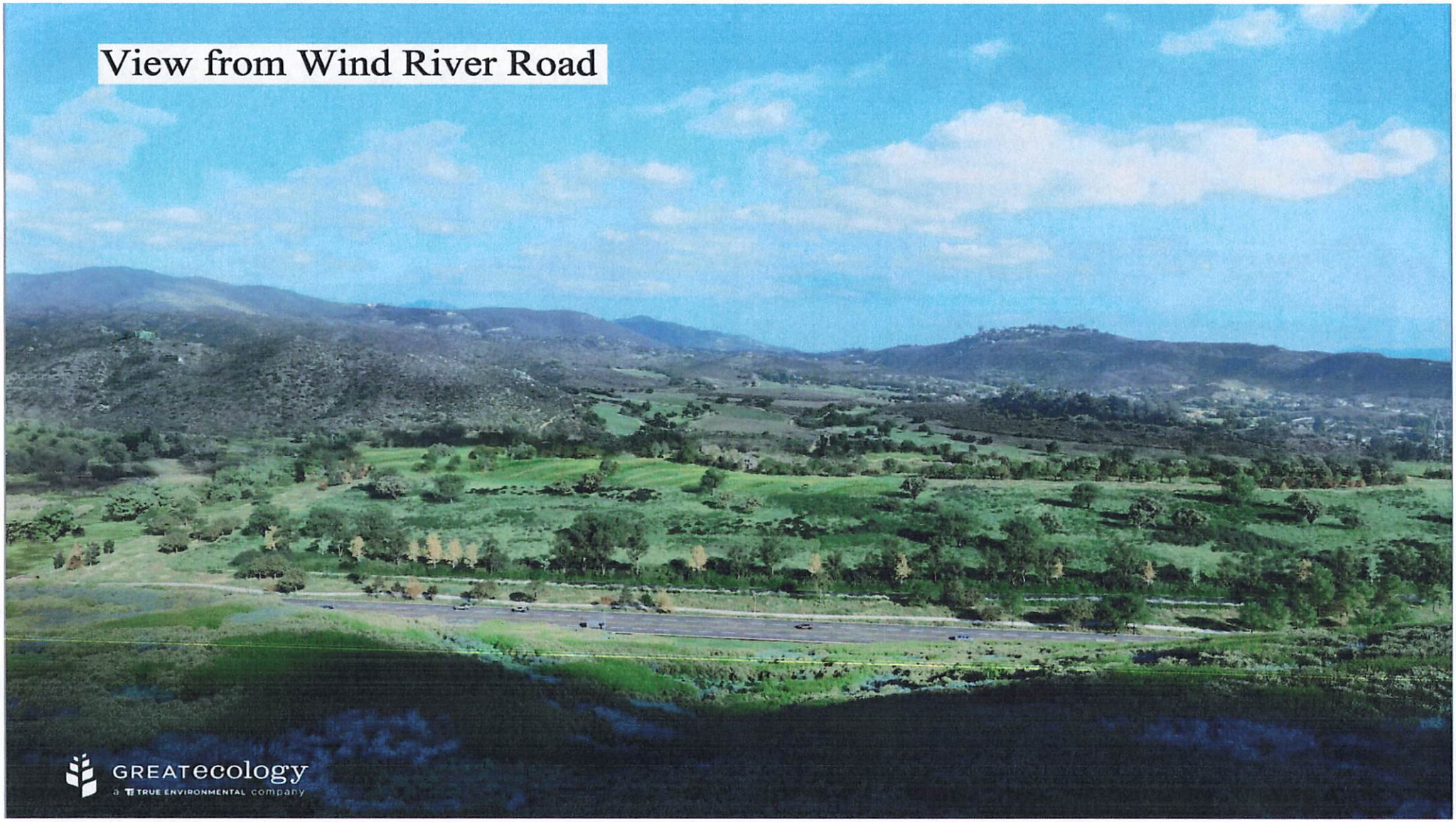



View from Public Path along Willow Glen Drive
GREATecology
a TRUE ENVIRONMENTAL company


View over Loop Trail


View from Multi-Use Path


View from Steele Canyon Bridge


View from Wind River Road
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PARTNERSHIPS



THANK YOU