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Sierra Club San Diego Chapter
8304 Clairemont Mesa Blvd., suite 101
San Diego, CA 92111-1315

December 15, 2018

Dear Ms. Brown:

Bronwyn.Brown@sdcounty.ca.gov

Subject: Proposed Cottonwood Sand Mine OPPOSITION

This letter is to provide commentary and to express our concerns regarding the proposed sand and gravel mine on the former Cottonwood Golf Course.

The location of the proposed sand mine is entirely inappropriate.

- First, it is located in the heart of the suburban Rancho San Diego community. This residential community has no industrial projects and is a quiet residential community. It already has high levels of traffic that would only be exacerbated by additional traffic, particularly heavy-duty diesel sand hauling dump trucks. It will be impacted by substantial noise and air pollution from the project. It is also in close proximity to two high schools, two elementary schools and a middle school that would be negatively impacted by the project's diesel exhaust. The four main pollutant emissions from diesel engines (carbon monoxide- CO, hydrocarbons-HC, particulate matter-PM and nitrogen oxides-NO_x) all have serious and lasting health effects, especially damaging to children.
- Second, the project will have major impacts on the quiet environment of the adjacent Steel Canyon Golf and Singing Hill Golf courses. Immediately to the South and East of the proposed Sand Mine lies the Steel Canyon golf course and country club as well as numerous homes along this golf course. Similarly, the Singing Hills Golf Course is adjacent to the proposed mine immediately to east.
- Third, it is located next to the McGinty Mountain Ecological Reserve. The McGinty Mountain reserve was purchased to maintain and protect rare plant and animal populations and the unique form of coastal sage scrub and chaparral vegetation

present, and was designated as an ecological reserve by the Fish and Game Commission in 1993. It contains substantial wildlife and numerous threatened or endangered plants. The reserve is jointly managed by the Nature Conservancy, San Diego County Parks, and the Environmental Trust. Additionally, wildlife corridors would be cut by the project connecting McGinty Mountain to other Multiple Species Conservation Project lands.

- Fourth, the project is located in the actual riverbed of the Sweetwater River. This 55-mile long river starts high in the Cuyamaca Mountains and flows to San Diego Bay crossing many sensitive ecosystems and preserves.

There are a number of major environmental concerns that would threaten both the Rancho San Diego community, the nearby Ecological Reserve, and the entire Sweetwater Watershed.

- 1) Noise Pollution. The project description for the supplemental application indicates that for more than a decade the project will conduct mining of over half a million tons of aggregate, grading with diesel equipment, loading trucks, operation of front loaders, use of a long conveyer belt to haul aggregate, the separation of sand from aggregate, and an operational aggregate crushing, and processing facility. All of these activities would produce substantial noise that would impact and diminish the environment of both the local residential community and the adjacent ecological reserve. Noise pollution from digging, grading, loading, screening, and rock crushing from the conveyer line would all add to the disruption of the quality of life of this suburban family neighborhood.
- 2) Traffic. Traffic is already heavy on all the roads along the project including, Willow Glen, Steel Canyon and Jamacha Road. Truck trips would exacerbate these already heavy traffic loads and create traffic jams along these streets.
- 3) Air pollution and fugitive dust. Despite the best practices, fugitive dust from mining, hauling, conveying, and loading will occur. Fugitive dust is carcinogenic and is implicated in many respiratory problems including COPD, asthma, emphysema, and premature death. Moreover, dust pollution would blow westward with the prevailing winds and cover endangered plants in the McGinty Mountain Preserve. Finally, canyons in East County like the Sweetwater River Valley are prone to fierce Santa Ana winds that would reduce the number of mining days, while blowing fugitive dust into the Rancho San Diego Community and beyond into Spring Valley, Lemon Grove, Chula Vista, and San Diego.
- 4) Chemical Weed Control. Surprisingly, chemical weed control is proposed for the project at a time when Bayer's "Roundup" and other herbicides have been implicated in a massive bee die off and increased rates of human cancers. Glyphosates being applied in the vicinity of drinking water sources would result in contamination and violations of the federal Clean Water Act.
- 5) Water Pollution. The proposed Cottonwood Sand Mine is proposed for the actual river bed of the Sweetwater River! This is an important river that carries considerable water and consistent flows during the rainy season. South of the proposed sand mine the river winds through the San Diego National Wildlife Refuge and the Sweetwater River Trail.

Silt, sand, and toxic heavy metals will be carried downstream into environmentally sensitive areas into the Sweetwater Reservoir. During much of winter and other major rain events, runoff would carry pollution including sand, soil and heavy metals down the Sweetwater River and into the Sweetwater Reservoir, a major source of drinking water for San Diego County. Downstream from the Reservoir the river passes through the Sweetwater Regional Park, parkland in the City of Bonita, and the environmentally sensitive Sweetwater Marsh, a part of the San Diego National Wildlife Refuge. It empties into San Diego Bay near the Living Coast, an ecological reserve and nature center. Metals, sand, and silt from the proposed mine would constitute a threat to this entire ecosystem. Attempts at previous restorations for mining sites that incorporate mining waste into the restoration substrate have been shown to fail in the post 5-year monitoring period in several studies. In short, the Sweetwater Watershed will be negatively impacted beyond the abilities of any known or feasible mitigation.

- 6) Community Character. A sand and gravel mine is stunningly incompatible with community character of the surrounding suburban community. Dust and traffic will impact two high schools, a junior high school, and two elementary schools. One elementary school is located just ¼ mile from the proposed mine. Quiet residential areas surround the proposed Cottonwood Sand Mine is zoned as recreational, not industrial. Adding this property to the National Wildlife Refuge or converting it to County Parkland would be compatible, but a sand and gravel mine is strikingly incompatible with the community character.
- 7) There is no need for additional aggregate in San Diego County. Indeed, every area of San Diego County has PCC – grade sand/aggregate that could be mined. The result is that more than 57,000 acres of industry quality sand and aggregate are readily available. Based on these detailed published findings by the County of San Diego, there is no present or near future foreseeable shortages of PCC- grade sand and aggregate.
- 8) Cumulative impacts. Cumulative impacts must be addressed. Traffic Impacts including Sycuan Casino traffic and increased traffic on Steel Canyon and Willow Glen due to the Jamul Casino, must be considered.
- 9) Greenhouse Gas Impact. The use of heavy-duty mining equipment including bulldozers, front Loaders, conveyer belts, and trucks is incompatible with county greenhouse gas goals. Moreover, the removal of hundreds of trees along the existing golf course, would have negative effects on carbon storage and climate change. This existing land stores considerable carbon that would be released if trees and other green plants are removed from the existing golf course. The idea that his project will reduce greenhouse gas is flawed and self-serving notion of a special proximity to sand consuming developers. This “logically closer” argument would be true of any polluting resource extraction operation. One million tons per year of sand and aggregate per year will influence markets and create new distribution networks. Depending on market conditions, it may lead to export of PCC-grade material from San Diego to other areas, such as Los Angeles or Arizona resulting in longer hauls, not shorter ones. In fact recycling building materials

as was done with the Conrad Prybus Student Union at San Diego State rather than mining new materials is the best method to prevent greenhouse gas emission.

- 10) No Proposed Mitigation. Both the production of additional greenhouse gas and the loss of green open space will need to be mitigated. No mention of mitigation is made in the proposal.
- 11) The products and processes of sand mining and aggregate crushing operations place significant amounts of pollutants into the air, including sub-micron and respirable particles of silica. Small silica dust is recognized as carcinogenic, and exposure to silica has been determined as an occupational health hazard since the early 1930's. Silica dust plumes are invisible, lighter than air, readily respirable and extraordinarily dangerous to lung tissues. A complete and total process evaluation of silica dust generated by the sand mining operation must be included in any environmental review undertaken by the County of San Diego.
- 12) Valley Fever is a serious and sometime fatal lung infection of the coccidioides fungi, which is many times associated with mining and earthmoving. While some people experience a continued cough, others can be stricken for years into such a limited capacity as to be bedridden by the infection. Deaths from coccidioidomycosis are not uncommon in high occurrence areas. There are three distinct stages of Valley Fever that manifest in patients; acute, chronic and disseminated coccidioidomycosis, with those suffering from compromised immune at serious risk. The opening of a sand mine operation in close proximity to residents in areas where Valley Fever occurs increases the rate of exposure and threatens those frequently outdoors, including seniors and children.

Thanks for your attention to our opposition to this damaging project. Please keep Sierra Club San Diego informed of all proposed actions regarding this sand mining attempt.

Sincerely,

Dr. Peter Andersen, Chapter Chair
Sierra Club San Diego

George Courser, Conservation Chair
Sierra Club San Diego