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Subject: Cottonwood Sand Mining Project DEIR Issued 12/16/21
(PDS2018-MUP-18-023), (PDS2018-RP-18-001); LOG NO. PDS2018-ER-18-19-007;
SCH# 2019100513

Thank you for considering the following comments and questions pertaining to the Cottonwood Sand Mining Project draft Environmental Impact Report issued on December 16, 2021 for public review.

A review of the Cottonwood Sand Mine Draft EIR and Technical Reports shows that air quality health risk assessments (HRAs) are used to quantify the additional health risk to the surrounding community caused by the project. Risk is broken into three categories, acute for risk brought on by short term exposure, and cancer and chronic risks both brought on by long term exposure to the prolonged diesel activity.

This project has all three included, with the focus on cancer risk due to the prolonged diesel activity, but it is up to the project applicant and modeler to input the usage data. These user inputs are supposed to be highly conservative, realistic and transparent.

Guidance documents and regulatory models are used to calculate risk, but these documents do not fairly model the risk, and are not consistent with similar recent projects in San Diego County. One good example is the El Monte Sand Mine. The County is not holding the Cottonwood project to the same standards as in El Monte.

In the Cottonwood project the applicant does not sufficiently explain the health risk. In the El Monte project, the health risks are explained in discernable text, whereas the Cottonwood project expects residents to interpret hundreds of pages of tables. The El Monte project boiled down the technical air quality report, instead of burying the significant information in myriad tables and repetitious regulatory language.

This lack of uniform standards needs to be addressed for Cottonwood.

Following are concerns/questions about the Cottonwood DEIR air quality section and the related technical report (Appendix I):

Discrepancies in modeled source locations and the calculated emissions

The two biggest discrepancies are the modeled source locations and the calculated emissions.

In the El Monte Sand Mine EIR, the many modeled source locations are along the perimeter of the site, demonstrating that equipment may be used within the entire site. Appendix I File 1 page 34 states the use of OEHHA 2015 guidance, but the Cottonwood DEIR shows the emission sources as being only in the middle of the project, and only in four spots, as if the equipment would never move from these four conveniently modeled sources.

How were the emissions calculated for onsite mining equipment? Standard practice for the industry is to use AP-42, which is what was used in the El Monte Sand Mine EIR. It appears Cottonwood applicants only used CalEEMod, which was not meant to quantify mining emissions.

Lack of criteria used for analyzing sensitive receptors

It is not evident what criteria was used for analyzing sensitive receptors. There are many homes, schools, a senior citizen facility, and more within a half mile of the project, all of which seem to be largely ignored in the analysis. (It is of course not proper to measure from the middle of the site to the middle of schools and other sensitive receptors.)

Heavy duty truck idling/Emissions

Was any heavy-duty truck idling at the proposed entrances/exits accounted for in the HRA emissions? Were offsite emissions calculated as well?

During the day when the school children are in classrooms and outdoors, one-half mile from the project site, what are the engine requirements for the aggregate loading trucks idling at the entrances/exits of the site?

What are the engine requirements for the trucks entering the site for aggregate loading? The use of Tier 4 engines for all onsite equipment is mentioned in Appendix I but does not appear to be an official mitigation in the DEIR section. Will Tier 4 engines be used and how will this be tracked?

Have Tier IV engines and the difference in cancer causing DPM emissions been assessed?

Additionally, if project emissions calculated for inventories are higher than proposed in the CEQA documents, what type of mitigations will be initiated?

Additional Comments/Questions

Was combined health risk from DPM calculated for both construction preparation activities and mining operations?

Was the use of a rural setting in CalEEMod for Phase 1 approved as appropriate in this case? If so, does this adequately represent a description of the surrounding area?

Did the hay fever modeling use the same dispersion assumptions as the health risk assessment?

The EIR document notes that the County Zoning Ordinance allows for "Extractive use ... within" certain areas of the site "with approval of a Major Use Permit." It is unacceptable for the EIR to solely utilize the County Zoning Ordinance to reference the allowance of an extractive use, while ignoring, minimizing and glossing over how such a use would violate the clearly stated principles in the other relevant guiding documents, including CEQA, the County General Plan and Valle de Oro Community Plan.

This is not an 18-month, a two-year, or even a three-year project, in which the area residents would face and accept some minor, short-term annoyances and less than optimum conditions in exchange for an improved site just on the horizon.

The project proposes 10 years of mining, followed by a two-year reclamation plan and, in addition, "five to seven years post reclamation for each phase" to gain full maturity for any regrowth of vegetation. In other words, another five to seven years following the 12 years for the final phases of the project.

This is clearly not a rezone application. Instead, it's a major use permit application, "temporarily" impacting the site. In effect, it is a rezone, but for only 10-12 years – minimum.

Cottonwood Sand Mining Project DEIR

Page Four

The location proposed is both highly inappropriate and inconsistent with the general and community plans. The DEIR does not adequately mitigate the long term impacts of the project.

Sincerely,

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