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PRESENTATION

By Elizabeth Urquhart, Chair of StopCottonwoodSandMine.org

On July 25, 2023, at 6:30pm – 8:30pm

Public Meeting on the Cottonwood Sand Mine Project

Hillsdale Middle School, El Cajon

Good evening. I am Elizabeth Urquhart, Chair of StopCottonwoodSandMine.org, a non-profit civic organization established in 2018 to fight against this horrific project that will do irreparable harm to neighborhood character, the people in the surrounding area and beyond. I represent 14 members of the Board of Directors as well as over 5,000 residents in our community.

First, thank you for providing the opportunity for community members to comment this evening and for moving the deadline for written comments to August 21st. I will focus my comments this evening only on the new information in the Draft EIR which includes the Revised Project Description; Traffic, Biology, Noise and the Stormwater Quality Management Plan.

Revised Project Description Raises More Questions – it was only after the circulation of the Draft EIR that it was discovered that the Proposed Project would be required to import backfill material, adding an additional 58 truck trips per day as well as a second conveyor. In addition, the Stormwater Management Plan initially proposed was insufficient addressing only the frontage improvements along Willow Glen Drive rather than the entire sand mining operation, and the Biological Resources section needed to be completely redone since the Draft EIR missed several special status plant and animal species in their report. What other significant changes can the community expect during this process we wonder?

Traffic remains a significant impact that cannot be mitigated – in fact, the new information makes the traffic impacts worse! The RDEIR indicates that an additional 58 truck trips will occur daily due to the need to haul back-fill material – this is on top of the 89 truck trips stated in the original Draft EIR. This totals 147 round-trip truck trips daily or 294 trucks either coming to or leaving the Sand Mine location. Trucks will be operating Monday – Friday from 9:00am to 3:30pm or 6 and a half hours daily. This means a large hauling truck will be traveling either to or from the project site every 1.3 minutes or 78 seconds.

The heavily traveled Jamacha Road, Willow Glen Drive, and Steele Canyon Road cannot handle this additional heavy use. The Recirculated documents state that it was determined that the additional truck trips will not change the already determined “less than significant” impact. This statement is



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erroneous and makes no sense at all! Anyone who travels in the area by vehicle, bike, or on foot can tell you that without a sand mine nearby, Willow Glen Drive already experiences excessive truck trips due to Robertson's Ready Mix located at 2094 Willow Glen Drive and Hesters Granite Pit at 2268 Willow Glen Drive. The recirculated documents dismiss the fact that the Cottonwood Sand Mine heavy truck hauling will affect the community's streets, air quality, greenhouse gas emissions, health risk, and noise in the area.

I would submit to you that the cumulative traffic impacts have NOT been adequately analyzed and therefore an updated traffic analysis is needed to address not just the impacts from the Proposed Project but the cumulative impacts of both truck and vehicle impacts as well.

Additionally, if traffic surveys were conducted between 2020 and 2022, they must be dismissed and redone because they do not capture an accurate analysis of cumulative traffic impacts. Due to the unusual circumstances during the COVID-19 Pandemic, traffic was changed and halted in many ways. Stay-at-home orders began March 19 of 2020, and they were not lifted until January 25 of 2021. We all can see that traffic is significantly different today in 2023 than it was during California's shutdown. The Applicant's traffic study includes some data collected on August 30, 2018, and other traffic data was collected on October 23, 2020. This data must be rejected since it is not an accurate depiction of pre or post COVID-19 Pandemic traffic patterns. The Applicant must conduct a new traffic study for any data to be valid.

Biological Resources remain a significant impact that cannot be mitigated – the Recirculated documents conclude the project implementation could result in “potentially significant impacts to sensitive plant and animal species, sensitive natural communities and riparian habitat, jurisdictional wetland and non-wetland waters, and consistency with local policies, ordinances and adopted plans protecting biological resources”. There were 23 animal species identified as potentially being significantly impacted. Mitigation measures proposed involving relocation of species, removing their habitat by eliminating trees and plants, or having minimal setbacks and noise barriers are wholly inadequate. The report minimizes the fact that the project site is currently a vital and critical wildlife linkage/corridor connecting protected wildlife habitat near and adjacent to the project site. The Cottonwood Golf Club property is considered the missing link in a resilient and accessible open space network protecting endangered species habitat, drinking water, and connections to the existing San Diego National Wildlife Refuge. A decade of project mining could cause permanent impacts affecting wildlife community health by fracturing and isolating wildlife communities. This property is zoned Open Space-Recreational to protect the land and its inhabitants. This commitment must be honored.

Most mitigation measures proposed in the Recirculated documents do not address the significant direct impacts to wildlife habitat during the project timespan. Instead, what is described is deferred



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mitigation after 10 years of mining has been done. The Recirculated documents state that the project would ultimately contribute approximately 142.8 acres of preserved, rehabilitated, restored, and revegetated habitat to the linkage which will be placed within a Biological Open Space (BOS) easement. This is not a viable mitigation strategy for significant impacts during years one through ten of the Project. The Reclamation Plan with a Biological Open Space easement is a post-project deferred mitigation strategy which must be rejected since it does not address the significant impacts to special status species during the project timeline.

Noise to the surrounding area remains a significant impact that cannot be mitigated – the Recirculated documents indicate that a second conveyor will be used to transport backfill material and that the mining operation noise is assessed as potentially significant. Mitigation measures indicated that one area near to the sand mine location will have its proposed noise barrier increased from 8-feet to 12-feet. This potential barrier eyesore in one area will not mitigate the high level of cumulative noise experienced by all community residences around the sand mine location, especially residences at higher elevations.

The Stormwater Quality Management Plan was revised – and we ask why? It is disheartening to see the Applicant and the County miss so much that should have been in the Draft EIR. Overall, this revised Plan is very generic, lacks specifics and focuses more on what the final product will look like rather than HOW the water source in the event of storms, not just a water transfer from Loveland, will be protected during the 10+ years of the mining operation. Also, there are substantial changes in this Plan, and we will be most interested in the responses from both the Sweetwater Authority and the Regional Water Quality Control Board (RWQCB). We wonder if each agency reviewed and commented on this Plan?

Has the County addressed the impacts described in the letter from the Sweetwater Authority dated February 24, 2022? Does this revised Stormwater Quality Management Plan fully mitigate their concerns? The Authority is an independent water district that depends on the Sweetwater River watershed and serves and provides drinking water to approximately 200,000 people living in Chula Vista, National City, and Bonita. Their concerns with the proposed mining operation include water quality, hydrology, and the Authority's ability to transfer water from Loveland Reservoir through the Sweetwater River to the Sweetwater Reservoir and the Perdue Plant. One of their water sources is the capture of local runoff in the Sweetwater River. How will this revised Stormwater Quality Management Plan protect this water source?

In conclusion, it appears that the focus in the Recirculated Draft EIR is more on the Proposed Reclamation Plan for mitigation rather than the damage that will occur during the time of the mining operation and the horrible irreparable harm to people, the neighborhood, and the environment. The



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Recirculated Draft EIR often uses the word “temporary” and it states that, “ultimately, the Project would leave the site suitable for uses allowed by the existing land use designation – with the site remaining as open space”. There is no guarantee that the mining operation is limited to only 10 years. Just look at other mining operations in Lakeside, Grove-McGrath Quarry on Jamacha Road and Hesters Granite Pit just down the road on Willow Glen Drive. Even after the mining is done, how long will the reclamation of the land take? This process could take 10-20 years or more and even then, IT WILL NEVER BE THE SAME!!

I want to again extend my thanks to the County for allowing StopCottonwoodSandMine.org to present our feedback on the Recirculated Draft Environmental Impact Report documents. I would also like to thank all the community members and local organizations that continue to work closely with us. And lastly, I would like to thank the Members of the Board of Directors of the StopCottonwoodSandMine.org, they include Dan Weber, Brian Lorenz, Barry Jantz, Dianne Jacob, Jim Caputo, Sharon Cox, Zachary Svelling, Josan Feathers, Linda Wilks, Roxana Gores, Bob Collins, Lessa Ritzma and Peter Anderson. Thanks to you all.