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September 1, 2023

**Via E-Mail**

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

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

Dear Mr. Jacobs:

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

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

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[species/3290679/?fbclid=IwAR3uoUAsTpyNt\\_F6xL3jAsurfDavG0JuLbzq2MNQRsbLBmzEDRQ7ZpXMUVs](https://www.fox35.com/story/news/3290679/?fbclid=IwAR3uoUAsTpyNt_F6xL3jAsurfDavG0JuLbzq2MNQRsbLBmzEDRQ7ZpXMUVs); and the news article attached to this letter as Attachment A. The segment and article (henceforth referred to as “news article”) explain that water releases from the Loveland Reservoir, combined with a rainy winter, resulted in resurgence of the arroyo toad population, because the toads rely on water for breeding habitat. Id. The water flow from Loveland Reservoir, above the golf course to the east, flows through the golf course, and then to the Sweetwater Reservoir below the golf course to the west.

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

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

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

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



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

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

[https://www.nbcsandiego.com/videos/storms-water-district-give-hope-to-endangered-san-diego-county-arroyo-toad-species/3290679/?fbclid=IwAR3uoUAsTpyNt\\_F6xL3jAsurfDavG0JuLbzq2MNQRsbLBmzEDRQ7ZpXMUVs](https://www.nbcsandiego.com/videos/storms-water-district-give-hope-to-endangered-san-diego-county-arroyo-toad-species/3290679/?fbclid=IwAR3uoUAsTpyNt_F6xL3jAsurfDavG0JuLbzq2MNQRsbLBmzEDRQ7ZpXMUVs)

cc: Susan Wynn, USFWS  
David Mayer, Regional Supervisor, CDFW  
Heather Schmalbach, CDFW  
Dahvia Lynch, Director, County Planning & Development Services  
Bethany Principe, Coordinator, County Parks and Recreation MSCP Program  
Stephanie Neal, County, Sustainability Planning Division  
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Dave Hogan  
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Elizabeth Urquhart  
Dan Weber  
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**EAST SAN DIEGO COUNTY**

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

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

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



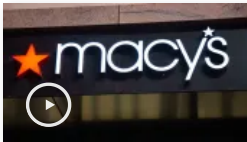
The arroyo toad is not off the U.S. endangered species list – but now there's hope.

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

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

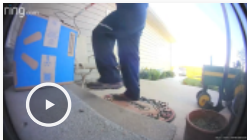
"They're probably about the size of a penny," said Famolaro while holding the tip of his index finger to the base of his thumb.

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

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

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

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

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

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

Fisher and Famolaro have studied the toad together for years.

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



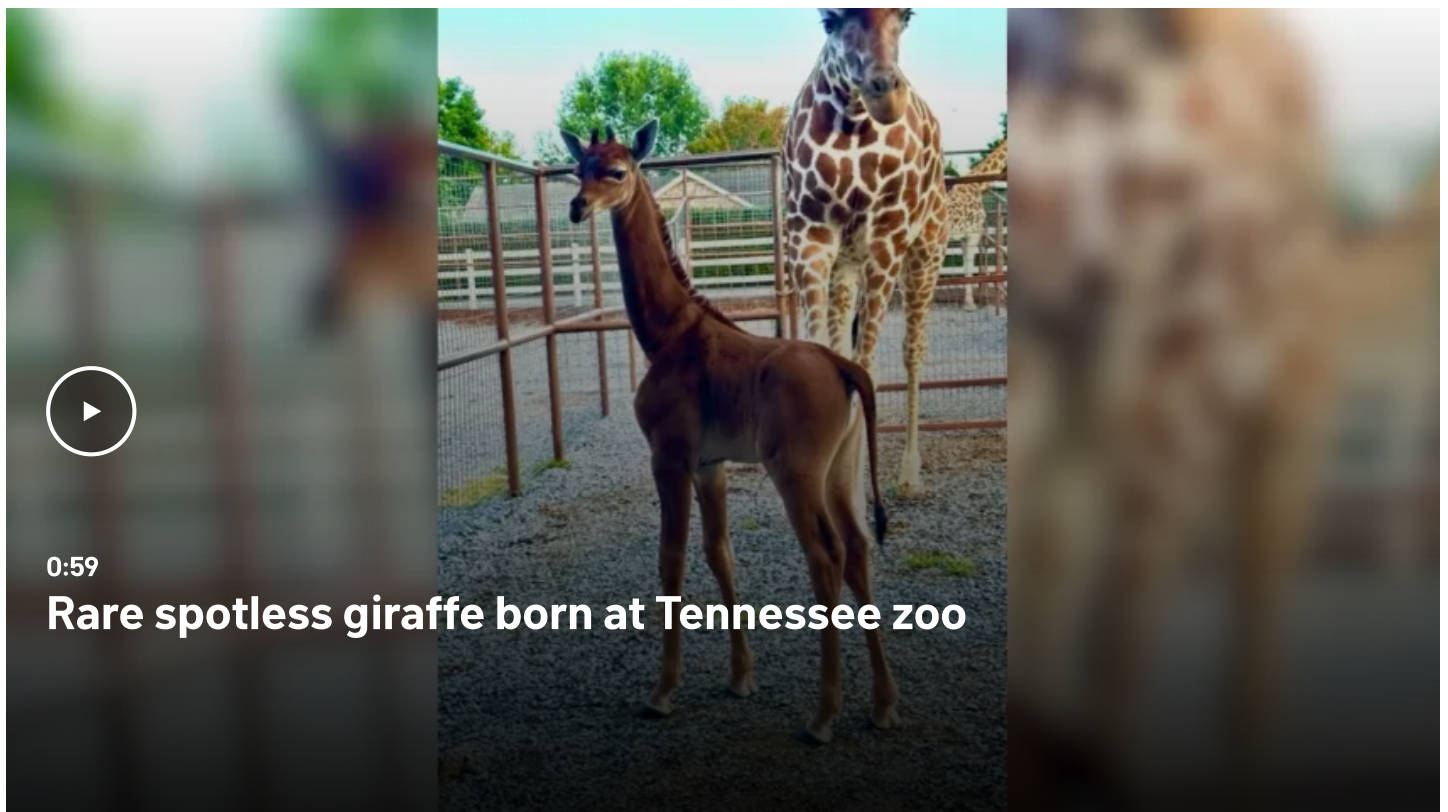
A FedEx driver killed a rattlesnake after delivering a package in Nebraska.

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

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

“I was like, ‘Wow. We finally found a solution. We finally found something that worked,’” agreed Famolaro.

“Let’s think about reestablishing them back in places where they used to be,” concluded Fisher.



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

This article tagged under:

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