

**1/19/22 PUBLIC MEETING  
PRESENTATION**

(following StopCottonwoodSandMine.org video)

Intro:

- Barry Jantz Intro Self – StopCottonwoodSandMine.org Board of Directors
- Website/Email – [www.StopCottonwoodSandMine.org](http://www.StopCottonwoodSandMine.org) and [info@stopcottonwoodsandmine.org](mailto:info@stopcottonwoodsandmine.org)
- Thank County Staff/Public
- Request for future In-Person meetings
- Intro other Board Members and those assisting:
  - Chair Elizabeth Urquhart
  - Dan Weber
  - Linda Wilks
  - Roxana Gores
  - Brian Lorenz
  - Sharon Cox
  - Zachary Svelling
  - Josan Feathers
  - Peter Andersen
  - Jim Caputo
  - Susanne Glasgow
  - Lessa Ritzma
  - Bob Collins
  - Bonnie Ripley

Summarized comments, with much more detail to be included in the formal, written response to the draft EIR we are in the process of finalizing:

It has been determined that the Cottonwood Sand Mining Project draft Environmental Impact Report is a flawed and incomplete document that does not adequately analyze the significant environmental impacts of the potential Project to the people, wildlife, water, air, and roads of the community.

Additionally, the Sand Mine Project does not propose adequate mitigation measures or alternatives to address those impacts. The draft EIR does not comply with applicable goals, policies or requirements of the San Diego County General Plan as well as the Valle De Oro Community Plan. Our findings are that the draft EIR is incomplete and not in compliance with CEQA and therefore must be revised and reissued to the public for review.

The most significant issues identified so far in the draft EIR include:

1. Aesthetic changes to the area are identified as a significant unmitigable environmental impact, that, as noted in the document "would result in conflicts with applicable goals and policies."
2. The proposed project is inconsistent with the Valle de Oro Community Plan and incompatible with the Community Plan regarding conservation.

That Plan's "stated vision is to retain a unique balance of urban, semi-rural, agricultural, and open space land uses. New development within the community is to conserve natural resources and topography and provide a pleasant, safe environment for community residents."

The project is in clear conflict with that statement and the draft EIR minimizes the obvious conflict.

3. The proposed project is inconsistent with the Land Use Element of the County of San Diego General Plan. The designation for the entire project site is Open Space-Recreation, which applies to large, existing recreational areas and allows for active and passive recreational uses.

As noted in the EIR, the General Plan "provides a framework to accommodate future development ... that is compatible with the character of unincorporated communities and the protection of

valuable and sensitive natural resources," while also providing for the "protection against incompatible land uses."

Again, the project is in clear conflict with those statements and the draft EIR minimizes the obvious conflict.

4. The draft EIR notes that CEQA Guidelines and County staff guidance states:

"A significant impact would occur if the Proposed Project would ... Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect."

The proposed project is very much in conflict with the land use plans of the County and the draft EIR minimizes the conflict.

5. As Biological Resources impacts, the draft EIR states that "Project implementation would result in potentially significant impacts to federally and state listed animal species, state Species of Special Concern animals," County listed animal and plant species, "and raptors with the potential to nest and/or forage over the Project site and immediate vicinity. Potential significant impacts would result from direct disturbance, loss of habitat, and noise."

Proposed mitigation plans described in the document are not sufficient to protect endangered and threatened species in the area.

6. Several aspects of the document refer to plans that will be developed to address mitigation. Deferral of mitigation is not allowed under CEQA. The EIR is inadequate without the detailed plans.
7. The Major Use Permit Findings cannot be made.

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.

8. The draft EIR does not address Emergency and Evacuation Access adequately. The report indicates that a "Traffic Control Plan would establish procedures," however these procedures are not detailed.
9. Transportation and Traffic are significant impacts with incomplete analysis.

Even with added turn lanes on Willow Glen, several fully-laden slow moving trucks per day will be turning left in front of quickly moving eastbound traffic on one of the area's busiest thoroughfares.

Again, this process does not allow for deferral of mitigation measures. It is unacceptable for the EIR to gloss over traffic impacts and the resulting emergency response times without fully detailing the plans for addressing those concerns.

Further summarized findings:

10. Biological Resources are significant environmental impacts with incomplete analysis in the draft EIR.
11. Noise is a significant environmental impact with incomplete analysis.
12. The health risk associated with Valley Fever is drastically minimized in the draft EIR.

13. The draft EIR appears to gloss over the impact on air quality as not being significant. However, even a moderate impact could be catastrophic and should be considered and studied.
14. The EIR must be revised to describe appropriate mitigation related to Vehicle Miles Traveled and Greenhouse Gas emissions.
15. The draft EIR does not properly address the project's potential significant impact to private water wells near the property site.
16. Other hydrologic impacts are inadequately addressed. The removal of 25 to 30 feet of sand from the banks of a pristine water source is of potentially significant impact to the Sweetwater River watershed. The sand itself acts as much of the watershed.
17. The draft EIR does not adequately address how sand mining activities will conserve rather than destroy wildlife habitats.
18. The draft EIR should be rejected as it does not properly address distances from homes and other aspects of the San Diego Region Aggregate Supply Study findings, of which the developer was involved as part of the Expert Review Panel.
19. A Fire Protection Plan has been prepared for the project per the draft EIR. However, it does not state that the plan has been reviewed and approved by any fire agencies, including San Miguel Fire District or CalFire.
20. The draft EIR should be revised or rejected to not include the apparent open-ended term "to the extent feasible," when it comes to mitigation. Instead, the EIR must clearly state what will and what will not be done per the requirements under the law and current regulations.

Reclamation:

While the long-term benefits of reclamation noted in the document are noted, the developer would be expected as a matter of course to return the site to its current condition, and it is nearly a given that efforts would be expected to enhance some of those conditions.

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.

#### Conclusion:

Hundreds of community members and other stakeholders, represented by StopCottonwoodSandMine.org, are seriously concerned about the significant impacts the Cottonwood Sand Mine Project's long-term sand mining operation will have on the residential community in Rancho San Diego and surrounding communities, downstream to the Sweetwater River, and to the San Diego National Wildlife Refuge.

As much as this type of sand is needed as a commodity, the location proposed by the applicant for sand mining operations is both highly inappropriate and inconsistent with the general and community plans. Just because a commodity is needed, doesn't make it appropriate or acceptable to obtain or extract that commodity anywhere.

Industrial open pit sand mines do not exist in developed, residential areas surrounded by homes, schools, businesses, parks, senior care facilities and

other long-established uses – nor should this one – certainly not at the expense of the community and the environment.