

From: S Glasgow <mcgintyrch@cox.net>

Subject: Scoping Comments Cottonwood Sand Mine

Date: November 21, 2019 at 7:19:02 PM PST

To: "Hingtgen, Robert J" <robert.hingtgen@sdcounty.ca.gov>

Robert,

Thanks for the opportunity to comment on the future EIR for the Cottonwood Sand Mine project. After reading the Initial Study (IS), I have the following comments:

Overall, the discussion of excavation and grading and how it relates to the river channel in the IS is confusing. It is unclear exactly where the grading will be. The IS says excavation is proposed to be 40' below the existing surface outside the channel. Exactly how is "the channel" defined/determined? Is this done with respect to the floodway and floodplain? Wetlands delineation? Low flow channel calculations?

The document also states silt fence would be placed on each side of the channel. In places it states there would be a widening of the channel. That slopes would be constructed down to the channel. That the channel would be revegetated. In other areas the document indicates the channel will be avoided.

Basically, it sounds as if a very wide area is being graded flat or relatively flat in this area. Please explain in the EIR how these actions are not considered to be removing an obstacle to growth. Please have the EIR explain how this project in and of itself is not growth inducing for future development of this area.

In the traffic study please address the proposed access point at Muirfield Drive. Please include the accident statistics for Willow Glen in this area. There is a sight distance problem on Willow Glen. The introduction of very large, slow moving trucks will introduce more safety issues on this road. The low number of trips in/out of the construction area is not likely to trigger the need for signalization. This is likely to lead to more accidents in this area.

The IS indicates the truck trips won't occur during peak hours. However, they will be occurring during school hours - schools adjacent to and near the project boundary. Please have the EIR correctly characterize this.

In several places the IS refers to the project as "temporary". I encourage you to be a bit more respectful with terminology such as this. It is the anticipated life of the project. To describe as temporary for 10-12 years almost seems to be gloating.

The discussion of water usage - including the need for only one water truck for dust control - please address how this was calculated.

With respect to reclamation - please address the specifics. Will reclamation occur in each area after each area is excavated and final grade established? Or will the County allow the entire area to be mined before any reclamation occurs? Why is there up to a 2 year lade before reclamation occurs?

Please address the specifics of the “chokepoint” in the river and how it will be remedied. Please thoroughly address the upstream and downstream impacts of this action - and how you determined the area of the of impact.

It appears as if there is a RPO for cultural and biological resources. Please ensure the cultural resources studies include a history of this area - including the historic significance of the structures, archeological resources, biological resources in the area, the golf course, its architects, and other characteristics and how these could warrant consideration of this area as a cultural/historical landscape.

Please explain how coordination will occur with Federal agencies to ensure permitting requirements, and NEPA for Federal agency actions, will be accomplished. Please address which State agencies will use the EIR for their permitting and approval actions.

In the EIR, please include a thorough discussion of past, present, and future projects and their impacts.

Please address aeriaily deposited lead and commit to soil test for this.

Please include a full range of alternatives, including no project, and the respective impacts of each.

Thanks.

Susanne Glasgow