



Stop Cottonwood Sand Mine, Org.
Save Our Community

Date: November 20, 2019

From: Elizabeth Urquhart, Chairperson
Stop Cottonwood Sand Mine, Org. (info@stopcottonwoodsandmine.org)

To: Robert Hingtgen, Planner III (Robert.Hingtgen@sdcounty.ca.gov)
San Diego County Planning and Development Services

Subject: **Environmental Impact Report Input for Cottonwood Sand Mining Project**

Dear Mr. Hingtgen,

On behalf of the Stop Cottonwood Sand Mine, Org. Board of Directors, I submit the following points that should be considered regarding the Environmental Impact Report content for the Cottonwood Sand Mining Project proposed in Rancho San Diego.

A Sand Mine located in the center of a developed residential community will degrade the quality of the environment by creating traffic safety hazards, harming air quality, adding significant greenhouse gas emissions, eliminating plants & wildlife, destroying cultural resources, and changing the beautiful, peaceful environment we now live in to one that is noisy and dangerous. SANDAG's 2011 San Diego Region Aggregate Supply Study (https://www.sandag.org/uploads/publicationid/publicationid_1558_12638.pdf), of which the Sand Mine developer (EnviroMINE, Inc.) was part of the expert review panel, indicates that sand mines should be located in areas not developed and that have not been conserved for environmental reasons. In addition, the study also states that a 1,300-foot setback from residential areas has been determined necessary to mitigate immediate impacts. Although sand is a needed commodity, this sand mine project's proposed location does not meet County standards. It needs to be located in an appropriate environment with minimal negative impact to people, wildlife, water, air, and roads.

- 1. Project must be consistent with San Diego County General Plan, Valle De Oro Community Plan, and Rancho San Diego Specific Plan** – the proposed Sand Mine project is not consistent with all plan policies.
- 2. Traffic Safety Hazard** – cumulative impact to traffic, safety and emergency evacuation routes must be considered; in addition to proposed Sand Mine, the Enclave at Ivanhoe

Ranch is planning 119 residences adjacent to the site. Already congested use of Jamul Drive, Steele Canyon Road, and Willow Glen Road cannot handle additional heavy use. Additional projects that should be considered in a cumulative study include Otay Village in Jamul (1300 residences between Jamul and Chula Vista) and Skyline Church Retirement Housing on Jamacha Road. Both projects will add significant traffic on Campo Road/Highway 94 and Jamacha Road/Highway 94.

3. **Land Use & Community Character** – the character of the area is developed and consists of residential, recreational, civic and open space uses. The RSD Specific Plan identifies the Cottonwood Golf Course serving as a buffer area and providing a larger setback to sensitive habitat areas. A Sand Mine will destroy sensitive habitat areas.
4. **Major Use Permit Findings** – proposed use requires that location, size, design and operating characteristics be compatible with adjacent uses – residences and nearby buildings. The proposed Sand Mine will have a harmful effect upon RSD’s desirable neighborhood character; the generation of traffic; the capacity and physical character of surrounding streets; and, the suitability of the site for the type and intensity of use or development which is proposed.
5. **Biological Resources** – the area contains jurisdictional waters of the State of California and the United States, including protected wetlands, requiring approval from State and Federal resource agencies. Several federally endangered and threatened species have been identified on or in the vicinity of the proposed project site (site is adjacent to the National Wildlife Refuge). The site is also within the South County and Metro-Lakeside-Jamul segments of the County’s Multiple Species Conservation Program (MSCP) designated preserve areas.
6. **Visual Resources** – Willow Glen Drive is designated as a County Scenic Road. Impacts to travelers using this road, persons walking and bicycling the road, and residences along the ridges that view this road must be considered.
7. **Air/Noise/Altered Hydrogeologic Conditions** – proposed Sand Mine would significantly impact the environment potentially harming residents, plant and animal species, water and the land. Such harm to human beings, animals and our environment must take priority over temporary private financial gain. We urge comprehensive study of these impacts.
8. **Sweetwater River** – the Sweetwater Authority documented that the Sand Mine proposes a variety of activities that could significantly increase pollution of the Sweetwater Reservoir. This source of drinking water must be protected.
9. **Cultural Resources** – numerous archaeological resources have been identified within a one-mile radius of the proposed Sand Mine site. Significant impact to tribal cultural resources is likely.

10. **Sensitive Populations At-Risk** – sensitive populations including schools, residential care facilities, and facilities and residences that house individuals with health conditions (children & elderly) would be adversely impacted by changes in air quality. Proposed Sand Mine identified that residences and nearby Jamacha Elementary school would be at-risk, however they must also study impact to Adeona Healthcare, an 80-bed residential treatment facility for adolescents which is adjacent to the Sand Mine site on Steele Canyon Road, the YMCA within a quarter mile of the property site, and La Vida Real, a senior living residence, which is about a half mile from the site.
11. **Required Local, State, National Agencies** – it is essential that the agencies identified in the County’s Scoping Letter of May 31, 2019, as well as any other affected agencies, be included in the EIR notification process as well as the required approvals for the project. This should be regardless of any planned reduction in project scope by the applicant since the Scoping Letter was issued. At minimum, those agencies include: U.S. Fish & Wildlife Service, Army Corps of Engineers, California Department of Fish and Wildlife, California Department of Transportation, California State Water Resources Control Board – Division of Drinking Water, California Department of Water Resources – Division of Safety of Dams, California Regional Water Quality Control Board – San Diego Region, U.S. Bureau of Reclamation – Southern California Area Office, San Diego County Water Authority – Water Resources Department, Sweetwater Authority, Otay Water District, San Miguel Consolidated Fire Protection District, Grossmont-Cuyamaca Community College District, Grossmont Union High School District, Cajon Valley Union School District, Jamul-Dulzura Union School District, and Local Native American Tribes.
12. **Community Planning Group Participation** – we request that the Community Planning Groups representing the regions most impacted by this project, Valle de Oro Community Planning Group and Jamul-Dulzura Community Planning Group, participate in the formal review and approval process related to the Cottonwood Sand Mine.

Thank you for requesting community input regarding this proposed project. Hundreds of community members have communicated with our organization expressing significant concerns – we appreciate the County considering carefully the detrimental impact a Sand Mine would bring at this location and how these many issues must be studied as part of the Environmental Impact Review process.

Sincerely,

Elizabeth A. Urquhart, M.Ed.

Chairperson

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