



County of San Diego

MARK WARDLAW
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
(858) 694-2962 • Fax (858) 694-2555
www.sdcountry.ca.gov/pds

KATHLEEN A. FLANNERY
ASSISTANT DIRECTOR

May 31, 2019

Greg Brown
New West Investment, Inc,
565 N. Magnolia Avenue
El Cajon, CA 92023

PROJECT NAME: Cottonwood Sand Mine Major Use Permit and Reclamation Plan
RECORD ID: PDS2018-MUP-18-023, PDS2018-RP-18-001, PDS2018-ER-18-19-007
PROJECT ADDRESS: 3121 Willow Glen Drive, within the Valle De Oro Community Planning area in the unincorporated area of San Diego County;
APNS: 506-021-19-00, 506-020-52-00, 518-012-13-00, 518-012-14-00, 518-030-05-00, 518-030-06-00, 518-030-07-00, 518-030-08-00, 518-030-10-00, 518-030-12-00, 518-030-13-00, 518-030-15-00, 518-030-21-00, 518-030-22-00, 519-010-15-00, 519-010-17-00, 519-010-20-00, 519-010-21-00, 519-010-33-00, 519-010-34-00, 519-010-37-00, 519-011-03-00, 506-021-31-00, 506-021-30-00
TRUST ACCOUNT NO.: 2091177-D-05619

Dear Mr. Brown,

Planning & Development Services (PDS) has reviewed your application for a Major Use Permit and is providing you with the attached package of information as a guide for further processing your application.

PROJECT DESCRIPTION

Below is the project description that staff has generated from the information provided in the application package. Please review this project description and verify with staff that the project description is correct:

The applicant is requesting a Major Use Permit and Reclamation Plan for a Sand Mining project for the production of sand, suitable for Portland Cement Concrete (PCC) use, on 280 acres. The project would convert the existing Cottonwood golf course in three phases. The proposed project would produce 3.8 million cubic yards (5.7-million tons) of mineral resources and would have a maximum production limit of 570,000-tons (380,000 cubic yards) of construction grade aggregate per calendar year. Excavated material will total 4.7-million cubic yards with approximately 3.8-million cubic yards (5.7-million tons) of construction aggregate produced. As mining is completed in phases, the site will be progressively reclaimed and restored.

The project will be developed in three mining phases and a fourth phase for final reclamation and will proceed in a southwest to northeast direction. The first phase will involve installation of access roads, creation of a pad for a processing plant east of Steele Canyon Road, placement of a conveyor/slurry line running west to east and development of the initial extraction area. As phases proceed the conveyor/slurry line will be moved to serve the areas mined in later phases. A final phase, Phase 4, will be a final reclamation, clean up and equipment removal phase. Facilities proposed for use at the site will include: a processing plant, a storage container, weigh scales and a modular scale house. The golf course will be operational as mining is completed in three phases. At the beginning of Phase 2, the front nine holes will be closed as mining begins and the back nine holes will continue to operate until the final phase of mining begins. After mining operations reclamation of the site will be conducted.

Site access for the project will require modification of the existing driveways and parking lot located on Willow Glen Drive next to the existing golf clubhouse. A new access point to the property from Willow Glen Drive west of the Steele Canyon Road (Phase 1 area) will be constructed.

The project site is located off Willow Glen Drive in the Valle De Oro Community Planning area, within unincorporated San Diego County. The site is subject to the General Plan Semi-Rural Regional Category, and Specific Plan Area Land Use Designation, and zoned Holding Area (S90), Open Space (S80), and Specific Plan (S88).

MAJOR PROJECT ISSUES

The following project issues were identified during the project pre-application scoping and are further discussed in the attachments to this letter. These issues may require substantial redesign of the proposed project or, if not resolved, would result in a recommendation for project denial by PDS. These issues discussed below, were identified based upon information presently available to the County and are subject to change upon submittal of further information and studies:

1. Consistency with the San Diego County General Plan:

Staff has provided a list of the General Plan goals and policies that need to be addressed as part of the project application and will require a qualitative and quantitative analysis. The list includes goals and policies from all the General Plan Elements along with policies from the Valle De Oro Community Plan and goals and objectives from the Rancho San Diego Specific Plan. The project will be reviewed to ensure consistency with the General Plan and a final General Plan consistency determination will be made after the project description is clearly defined and the environmental analysis is complete and finalized. Staff cannot move forward with a recommendation of approval until the project is found consistent with all applicable General Plan and community plan policies. Any proposed changes to the General Plan or Community Plan will require a General Plan Amendment.

Please see the attached Project Issue Checklist for a list of the goals and policies that need to be addressed.

2. Land Use/Community Character Consistency:

The character of the area consists of residential, recreational civic and open space uses, and the project request is for a sand mining, an extractive use. The Rancho Specific Plan identifies the golf course serving as a buffer area and providing a larger setback to sensitive habitat areas. In order to assess the potential impacts to community character a land use and community character analysis shall be prepared for the proposed project. Please see Attachment D for Scoping requirements.

3. Major Use Permit (MUP) Findings:

A Major Use Permit will also be required for the proposed Mining Operations (Extractive Use) pursuant to Sections 2805.c. and 2905.d. In accordance with Section 7358 of the Zoning Ordinance, it shall be found:

- a. That the location, size, design, and operating characteristics of the proposed use will be compatible with adjacent uses, residents, buildings, or structures, with consideration given to:
 - Harmony in scale, bulk, coverage and density;
 - The availability of public facilities, services and utilities;
 - The harmful effect, if any, upon desirable neighborhood character;
 - The generation of traffic and the capacity and physical character of surrounding streets;
 - The suitability of the site for the type and intensity of use or development which is proposed; and to
 - Any other relevant impact of the proposed use; and
- b. That the impacts, as described in paragraph "a" of this section, and the location of the proposed use will be consistent with the San Diego County General Plan.
- c. That the requirements of the California Environmental Quality Act have been complied with.

Please provide additional, quantitative information that accurately describes the scale, bulk, coverage and intensity of the proposed sand mine. Please provide draft MUP Findings. Ongoing coordination between County staff and the applicant will be required to adequately address the MUP findings. Staff cannot recommend approval until all findings are made.

4. MSCP Minor Amendment Area:

A portion of the proposed project site is located within a designated Minor Amendment area. Minor amendments require concurrence from the California Department of Fish & Wildlife (CDFW) and the U.S. Fish & Wildlife Service (USFWS). Requests for Minor Amendments will be in coordination with the Wildlife Agencies (CDFW and USFWS) in conformance with all applicable laws and regulations.

5. Biological Resource:

The site contains jurisdictional waters of the U.S./State and/or wetlands protected by the Resource Protection Ordinance (RPO). Impacts to jurisdictional waters will require permitting the authorizing resource agencies and/or compliance with the RPO, as appropriate.

Several federally endangered and/or threatened species have been identified on the project site or within the vicinity of the project. The site may contain species that are not covered by the South County Multiple Species Conservation Program (MSCP) Subarea Plan, such as Quino checkerspot butterfly and San Diego fairy shrimp (per 2006 code case). Impacts to such species may require a Section 7 consultation or Section 10 permit from the U.S. Fish and Wildlife Service.

A portion of the proposed project site is located within a designated Minor Amendment area. Additionally, any impacts proposed within the National Wildlife Refuge would require a Major Amendment. Both types of amendments require concurrence from the California Department of Fish & Wildlife (CDFW) and the U.S. Fish & Wildlife Service (USFWS). Major Amendments involve Federal Register Notice and an environmental document that addresses both state and federal environmental requirements (CEQA and NEPA). Please note that Major Amendment areas in particular can take years to complete and could result in significant delays in the processing of the project. Requests for Major and Minor Amendments will be in coordination with the Wildlife Agencies (CDFW and USFWS) in conformance with all applicable laws and regulations.

6. Visual Resources:

Based on an initial review, it appears that proposed project may adversely affect visual resources. Willow Glen Drive is designated as a County Scenic Road. Views from scenic vistas, scenic highways and County Scenic Routes, and public recreation areas will need to be analyzed further to determine the extent of any adverse impacts. Visual resources can include narrow or expansive views, views from one site or from a series of sites as along a scenic highway and views above, at eye level, or from below. A Visual Resources Study is required. The report should identify changes/modifications of the project from the original and provide mitigation and design considerations to reduce the visual impacts associated with this project. The recommended mitigation and design considerations should be incorporated into the project design.

In addition to the issues outlined in this letter, it is strongly recommended that you contact other agencies to determine additional project requirements. The following link provides an Agency Contact List to assist in your due diligence efforts:
<http://www.sdcountry.ca.gov/pds/docs/pds804.pdf>

PROJECT ISSUE RESOLUTION PROCESS

If you have disagreements with the requirements within this letter you should contact the project staff to resolve those issues. Upon discussion with project staff, you may have

these issues referred to the Project Issue Resolution process to provide you with an opportunity to quickly and inexpensively have issues considered by senior County management. Issues considered under this procedure can include disagreements with staff interpretations of codes or ordinances, requests for additional information or studies, or disagreements regarding project related processing requirements. Please contact me to learn more about this process, the limitations, or to request an application form.

Also, please be aware that a staff initiated Project Issue Resolution (PIR) meeting will be scheduled if one or more of the following criteria is met:

1. Submittal is inadequate or does not sufficiently address staff's comments; or
2. Identified major project issues remain unresolved; or
3. A review of four or more iterations is necessary.

ESTIMATE OF DISCRETIONARY PROCESSING COSTS AND SCHEDULE

An estimate of discretionary processing time and costs that includes several assumptions has been generated for your project and is included in **Attachment B**. It is estimated that **\$753,239.00-\$950,550.00** of County fees and deposits will be required to get the project through to a hearing. The total estimated time to process the proposed project is **17-36 months**. Attachment B includes the County's standard applicant submittal dates, three EIR iterations, and timely resubmittals of the project. The estimated hearing date for this project is between **Summer 2021 to Winter 2021**. Please note that the estimated cost and hearing date is based on certain assumptions detailed in the Attachment and could be more or less than the estimate provided. If the cost and schedule assumptions prove to be incorrect, the estimate will be revised. The estimate includes only the costs to get your present application to hearing and does not include additional post discretionary processing costs such as condition satisfaction and building permit fees.

Should your application be approved, there will be additional processing costs in the future (e.g., park fees, drainage fees, building permit fees). To obtain an estimate of future building permit and plan check fees, parks fees, and Traffic Impact Fees, see <http://www.sdcountry.ca.gov/PDS/bldgforms/index.html#fees>.

Please note that building permits are required to construct, enlarge, alter, repair, move, improve, remove, convert, or demolish a building or structure. Permits are also required for plumbing, electrical, and mechanical work. A permit must be obtained prior to construction and prior to occupancy. Failure to obtain a building permit is a violation of the County of San Diego Ordinances.

The Department's goal is to help facilitate the efficient and timely processing of each application. If, however, a project becomes delayed due to excessive project inactivity or account deficit, Board Policy I-137 will apply; please refer to the Board Policy I-137 at <http://www.co.san-diego.ca.us/cob/docs/policy/I-137.pdf> and the FAQ sheet at <http://www.sdcountry.ca.gov/luegdocs/PDS%20FORMS/Cover%20Sheets/Zoning%20Forms/PDS-907,%20processing%20inactive,%20deficit%20projects.pdf> for the Processing of Inactive and Deficit Projects.

DEFENSE AND INDEMNIFICATION

The Board of Supervisors may require a defense and indemnification agreement from the project owner and/or applicant on a case-by-case basis where significant risk to the County is identified in connection with the processing of a discretionary land use development project. The County will notify applicants of the requirement for a defense and indemnification agreement as early in the project processing as possible. Please see the Defense and Indemnification FAQ sheet (<http://www.sdcounty.ca.gov/pds/zoning/formfields/PDS-209.pdf>) for more information.

TECHNICAL STUDIES

Please note that preparation of the following studies, if requested, **must be completed by a consultant on the County's CEQA Consultant List for Privately Initiated Projects. The County-approved consultant must be the Principal Investigator for the study.**

Agricultural Resources	Groundwater
Air Quality (including Climate Change)	Historic Resources
Archaeological Resources	Mineral Resources
Biological Resources	Noise
EIR Preparer	Revegetation Planning
Fire Protection Planning	Transportation & Traffic
	Visual Analysis

The list of County-approved consultants is located at:

<https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/CeqaConsultantsList.pdf>

Any studies completed by consultants not on the County's list will not be accepted.

Should the consultant decide to apply for placement on the County's CEQA Consultant List, their application will be reviewed with the next batch of applications. Batching for the County's CEQA Consultant List typically takes place twice per year. **Application for placement on the County's CEQA Consultant List does not guarantee that a consultant will be listed.**

A study completed by a consultant not on the County's CEQA Consultant List may not be subsequently checked by a County-approved consultant as a way to avoid compliance with these requirements.

DEPARTMENT RECOMMENDATION

Comments and information in this letter, or lack thereof, should not be construed as the Department implying an overall recommendation or decision on your project. Planning & Development Services generally makes a final recommendation or decision to approve or deny a project when all planning analysis and environmental documentation is complete and, if applicable, the Community Planning Group input is received.

DETERMINATION OF COMPLETENESS

Completeness Determination – Section 65943 of the Government Code

PDS has completed its initial review of your application and cannot find it complete pursuant to Section 65943 of the Government Code at this time. Please review the attached package of information which will detail how to further process your application.

Completeness Determination – California Environmental Quality Act (CEQA)

Planning & Development Services has completed its review of your AEIS and determined it not to be “complete” as defined by the CEQA. Additionally, it has been determined that there is substantial evidence that your project may have a significant adverse effect on the environment. It will be necessary to prepare and submit a draft EIR to satisfy the requirements of the CEQA.

The County of San Diego’s environmental review guidelines require that EIRs be prepared by a consultant from the County’s List of Environmental Consultants (available at Planning & Development Services – Zoning Counter). Furthermore, the guidelines require that environmental technical studies be prepared by a California Licensed professional (i.e., engineer, geologist) qualified to complete the study or a consultant from the County’s List of Environmental Consultants (available at Planning & Development Services – Zoning Counter).

Attached is a generalized listing of the issues and the rationale for determining that your project may have a significant effect on the environment.

NOTICE: To comply with State law, the applicant/owner must file the Notice of Determination (NOD)/Notice of Exemption (NOE) signed by the lead agency and remit required fees to the County Clerk’s Office within five (5) working days of the date of project approval. Payment or sufficient proof of prior payment to the County Clerk is required at the time of filing. The filing of a NOD or NOE reduces the period of time the CEQA document can be challenged to **35 days**. However, if the NOD/NOE is not filed, this period is extended to **180 days**. The CDFW adjusts fees annually based on inflation. You must pay the amount effective January 1 of the year of the project decision.

Additionally, because your project may have an effect on native biological resources, State law requires the payment of a \$2,280.75 (2018 fees) fee to the California Department of Fish and Wildlife for their review of the Mitigated Negative Declaration (Fish and Wildlife Code §711.4) and a \$50 administrative fee to the County Clerk (\$2,330.75 total). Payment of these fees are required regardless of whether or not the effects on native biological resources are considered to be significant or clearly mitigated. The fee is assessed and due upon filing of the NOD after the final decision for the project. The applicant/Owner is responsible for filing the NOD/NOE, signed by the lead agency. Payment may be made with cash or by check/money order made payable to the "San Diego Recorder/Clerk". American Express, Discover, MasterCard, and Visa Debit card payments are also accepted at the County Administration Center with a \$2.50 surcharge

per transaction. The fee will be forwarded to the Department of Fish and Wildlife (Administrative Code Section 362, Article XX). For further guidance refer to the Fish & Wildlife Fee Frequently Asked Questions Sheet at:

<http://www.sdcountry.ca.gov/luegdocs/PDS%20PROCEDURES/REGULATORY%20PLANNING/REFERENCE%20DOCUMENTS/Fish%20and%20Game%20Fee%20FAQs.pdf>

RECORDATION OF PERMIT

Pursuant to the San Diego County Zoning Ordinance Section 7019, Permit Decisions for Administrative Permits, Density Bonus Permits, Site Plans, Use Permits, Variances, Reclamation Plans, or any modifications to these permits shall be recorded to provide constructive notice to all purchasers, transferees, or other successors to the interests of the owners named, of the rights and obligations created by this permit. The Recordation form, will be provided immediately after the Decision determination for this project and must be signed, notarized with an all-purpose acknowledgement form and returned to PDS at the initiation of the Condition Satisfaction Process, or as otherwise specified. Once received, PDS staff shall have the document recorded at the County Recorder's Office.

PROJECT PROCESSING GUIDANCE

Planning & Development Services (PDS) has reviewed your pre-application submittal for a solar facility and energy storage project and is providing you with the attached package of information as a guide for further processing your application. A Project Issues Checklist for all issues, revisions or processing requirements has been prepared for your project and is included in this letter as Attachment A. **This checklist shall be used by the County and the applicant as the checklist of project issues that must be resolved and revisions that must be completed prior to public review under the California Environmental Quality Act (CEQA), or decision if no circulation of environmental documentation is required pursuant to CEQA.** In response to the Project Issues Checklist, the applicant is expected to include a letter with every submittal made to the Department stating how each item number in the Checklist has been addressed.

CONSULTANT LIST & MEMORANDUM OF UNDERSTANDING (MOU)

Certain technical studies must be prepared by a consultant from the County's CEQA Consultant List, which can be found on the County of San Diego's website at: <http://www.sdcountry.ca.gov/luegdocs/PDS%20PROCEDURES/REGULATORY%20PLANNING/REFERENCE%20DOCUMENTS/CEQA%20CONSULTANT%20LIST.pdf>. No list is maintained for hydrology and stormwater management planning. With the exception of minor stormwater management plans, only registered engineers registered in the State of California shall be permitted to submit hydrology/drainage studies and only registered engineers or Certified Professionals in Storm Water Quality certified by CPESC, Inc., or an equivalent entity approved by the Director of Public Works, shall be permitted to submit stormwater management plans.

Applicants are responsible for selecting and direct contracting with specific consultants from the County's list to prepare CEQA documents for private projects. Prior to the first submittal of a CEQA document prepared by a listed consultant for a private project, the

applicant, consultant, consultant's firm (if applicable) and County shall execute the attached Memorandum(s) of Understanding (MOU). The responsibilities of all parties involved in the preparation of environmental documents for the County (i.e. applicant, individual CEQA consultants/sub-consultants, consulting/sub-consultant firms, and County) are clearly established in the MOU for each requested applicable study. The clear identification of roles and responsibilities for all parties is intended to contribute to improved environmental document quality. The MOU can be found on the Department's website at: <http://www.sdcountry.ca.gov/luegdocs/Templates/Boilerplate%20Templates/MOU.doc>.

GUIDELINES FOR DETERMINING SIGNIFICANCE & REPORT FORMAT AND CONTENT REQUIREMENTS

Technical studies must be prepared using the Guidelines for Determining Significance and Report Format & Content Requirements. The Guidelines and Report Format & Content Requirements can be found on the Department's website at <http://www.co.san-diego.ca.us/PDS/procguid.html> (listed in alphabetical order).

SUBMITTAL REQUIREMENTS

To assure timely cost-effective processing of your project, all items must be submitted concurrently. The submittal must be made to the PDS Zoning Counter at 5510 Overland Avenue, Suite 110, San Diego, CA 92123. **For fastest service when submitting information requested in this letter, arrive at the PDS Zoning Counter between 8:00 a.m. and 10:00 a.m. Please note that all Public Counters at PDS are closed daily from 11:45 a.m. through 12:30 p.m. Expect longer wait times before and after the lunchtime closure.**

The submittal for the **Notice of Preparation** must include the following items:

1. Submit a copy of this letter.

Information/Document	# of Copies	Flash Drive with Word and PDF Doc	Document Distribution <i>(For Admin Purposes Only)</i>
Revised Project Description	2	Word & PDF	Heather Steven (1) Rob Hingtgen (1)
Project Plot Plan (11" x 17" max.)	2	PDF	Heather Steven (1) Rob Hingtgen (1)
Regional Location Map (8.5" x 11" County wide)	2	PDF	Heather Steven (1) Rob Hingtgen (1)

Information/Document	# of Copies	Flash Drive with Word and PDF Doc	Document Distribution (For Admin Purposes Only)
Specific Location Map (8.5" x 11" USGS Quad Scale)	2	PDF	Heather Steven (1) Rob Hingtgen (1)

The **subsequent submittal** must include the following items:

1. Submit a copy of this letter.
2. **SUBMIT A SEPARATE LETTER ADDRESSING EACH ITEM IN THE ATTACHED PROJECT ISSUE CHECKLIST (Attachment A), BY REFERENCE NUMBER.** This letter is required to detail how every unresolved item has been addressed in the resubmittal package.
3. In addition to the applications noted in #2 above, the following information and/or document(s) with the requested number of copies shall be provided.

Information/Document	# of Copies	Flash Drive with Word and PDF Doc	Document Distribution (For Admin Purposes Only)
Project Issue Checklist Response Letter	3	PDF	Heather Steven (1) Rob Hingtgen (1), LD (1) Business Rule: Project Issue Checklist Response Letter
Revised Project Description	4	Word & PDF	Heather Steven (1) Rob Hingtgen (1), Valle De Oro CPG (1) Office of Mine Reclamation (1)
Revised Form 399-F (with Section 2 completed by the San Miguel Fire Protection District)	1	PDF	Heather Steven (1) Business Rule: PDS Form 399-F
Form 399-Sc (with Section 2 completed by the Cajon Valley Elementary and Grossmont Union High School Districts)	1	PDF	Heather Steven (1) Business Rule: PDS Form 399-Sc

Information/Document	# of Copies	Flash Drive with Word and PDF Doc	Document Distribution <i>(For Admin Purposes Only)</i>
Form 399-S (with Section 2 completed by the Spring Valley Sewer District)	1	PDF	Heather Steven (1) Business Rule: PDS Form 399-S
Form 399-W (with Section 2 completed by the Otay Water District)	1	PDF	Heather Steven (1) Business Rule: PDS Form 399-W
Plot Plan <ul style="list-style-type: none"> Plans must be folded to 8-1/2 x 11 maximum with the lower right hand corner exposed If multiple pages, sheets must be stapled together. Must include Elevations 	9	PDF	Heather Steven (1), Rob Hingtgen (1), Dave Kahler (1), Fire Marshal (1), Scott Rosecrans (1), Sean McLean (1), Noise Specialist (1), Dept. of Parks and Recreation (1), Valle De Oro CPG (1), Office of Mine Reclamation (1) Business Rule: Plot Plan
Conceptual Landscape Plan (if staff determines one is required)	3	PDF	Heather Steven (1), Dave Kahler (1) Valle De Oro CPG (1) Business Rule: Landscape Plans
Planning Analysis	2	Word & PDF	Heather Steven(1), Greg Kazmer (1)
Draft Major Use Permit Findings	2	Word & PDF	Heather Steven (1), Rob Hingtgen (1) (1)
Resource Protection Study	2	1 PDF	Heather Steven (1), Rob Hingtgen (1) Business Rule: Resource-Protection-Study)
Visual Impact Analysis	2	1 PDF	Heather Steven (1), Greg Kazmer (1) Business Rule: Visual-Impact-Report
Revised Reclamation Plan Text	4	Word, & PDF	Heather Steven (1) Jim Bennett (1) Rob Hingtgen (1)

Information/Document	# of Copies	Flash Drive with Word and PDF Doc	Document Distribution <i>(For Admin Purposes Only)</i>
			Office of Mine Reclamation (1)
Agricultural Resource Study	2	Word & PDF	Heather Steven (1), Agriculture Specialist (1) Business Rule: Agricultural Study
Air Quality Study	2	Word & PDF	Heather Steven (1), Air Quality Specialist (1), APCD – Jim Swaney (1) Business Rule: Air Quality Report
Health Risk Assessment	3	Word & PDF	Heather Steven (1), Air Quality Specialist (1), APCD – Jim Swaney (1) Business Rule: Air Quality Report
Full Biological Resources Report	2	Word & PDF	Heather Steven (1), Biologist (1) Business Rule: Biological-Resource-Report and/or Biological Resource Easement Map and/or Biology Resource (map)
Open Space, Fence and Sign Exhibit (if applicable)	2	PDF	Heather Steven (1), Biologist (1)
Off-Site Mitigation Information (if applicable)	2	PDF	Heather Steven (1), Biologist (1)
Conceptual Resource Management Plan (if applicable)	2	Word & PDF	Heather Steven (1), Biologist (1) Business Rule: Biological-Resource-Report and/or Biological Resource Easement Map and/or Biology Resource (map)
Conceptual Revegetation Plan (if applicable)	3	PDF	Heather Steven (1), Biologist (1), Dave Kahler (1) Business Rule: Revegetation Plan
Cultural Resource Report	2	Word & PDF	Heather Steven (1), Cultural Resources Specialist (1) Business Rule: Business Rule: Cultural-Resource-Report

Information/Document	# of Copies	Flash Drive with Word and PDF Doc	Document Distribution <i>(For Admin Purposes Only)</i>
Cultural Resource Report Confidential Appendix	1	1 PDF	Cultural Resources Specialist (1) Business Rule: Arch Survey Confidential
Additional Hazards Information	2	1 PDF	Heather Steven (1), Hazards Specialist (1) Business Rule: Hazardous Materials Information
Fire Protection Plan	3	Word & PDF	Heather Steven (1), Sean McLean (1), Fire Marshal (1) Business Rule: Fire Protection Plan
Drainage/Flooding Analysis	3	Word & PDF	Heather Steven (1), Sean McLean (2) Business Rule: Hydrology
Industrial SWPPP or a copy of the Notice of Intent to prepare a SWPPP (should be included with the Reclamation Plan)	2	Word & PDF	Heather Steven (1), Sean McLean (1)
Additional Detailed Water Demand	2	Word & PDF	Heather Steven (1), Jim Bennett (1) Business Rule: Groundwater Report
Geologic/Geotechnical Investigation Report	2	Word & PDF	Heather Steven (1), Jim Bennett (1) Office of Mine Reclamation (1) Business Rule: Geology Report
Noise Analysis	2	Word & PDF	Heather Steven (1), Noise Specialist (1) Business Rule: Acoustical/Noise Report
Climate Change Analysis/Information	2	Word & PDF	Heather Steven (1), GHG Specialist (1) Business Rule: Climate Change Analysis
Mineral Resources Report	2	Word & PDF	Heather Steven (1), Leanne Crow (1) Business Rule: Mineral Resources
Sight Distance Exhibit	2	PDF	Heather Steven (1), Sean McLean (1) Business Rule: Sight Distance

Information/Document	# of Copies	Flash Drive with Word and PDF Doc	Document Distribution <i>(For Admin Purposes Only)</i>
Traffic Impact Analysis	3	Word & PDF	Heather Steven (1), Sean McLean (2) <small>Business Rule: Traffic-Impact</small>
Trail Route Study& Exhibit	3	Word & PDF	Heather Steven (1), Margaret Diss, DPR (1)
Title Reports (Confirming Legal Access for all legal lots with color coded plotted easements)	2	PDF	Heather Steven (1), Sean McLean (1) <small>Business Rule: Preliminary Title Report</small>
Memorandum(s) of Understanding according to Attachment C	12 Subject Areas (1 Copy each)	PDF	Heather Steven <small>Business Rule: MOU</small>
Valley Fever Technical Study	2	PDF	Heather Steven (1), Eric McDonald - HHSA (1)
Owner of Property Authorization	1	PDF	Heather Steven
The staff turnaround goal for review of the requested information/document is 30 days.			

5. Deposits:

TRUST ACCOUNT ID#: 2091177-D-05619	
DEPARTMENT	DEPOSIT AMOUNT
PDS	\$50,178.00
DEH	\$1,434.00
TOTAL DEPOSITS:	\$51,612.00

* Refer to the attached "Estimate of Discretionary Processing Time and Cost" for a complete estimate of project costs through hearing /decision.

If you choose not to proceed with the project and you would like to request a refund of any remaining funds in your account, you may contact the Developer Deposit Hotline at 858-694-2320 or via e-mail at DeveloperDeposits.CustomerService@sdcounty.ca.gov. Please note that deposit funds may have been fully expended and a refund may not be processed until all work on the project is complete and the project file is closed.

SUBMITTAL DUE DATE: In order to maintain adequate progress and be consistent with the Estimate of Discretionary Processing Time and Cost (attached), PDS recommends that the information requested in this letter for the Notice of Preparation be submitted by **June 21, 2019**. PDS recommends that all of the remaining information requested in this letter be submitted by **July 31, 2019**. If you are unable to submit the requested information by the above date, please contact your PDS Project Manager to submit a due date extension notification. Notification must be submitted in writing and be signed and dated by the project applicant. The notification must include a revised submittal date and a brief rationale for the extension.

The Department's goal is to help facilitate the efficient and timely processing of each application. If, however, a project becomes delayed due to excessive project inactivity or account deficit, Board Policy I-137 will apply; please refer to the Board Policy I-137 at <http://www.co.san-diego.ca.us/cob/docs/policy/I-137.pdf> and the FAQ sheet at <http://www.sdcounty.ca.gov/PDS/docs/907.pdf> for the Processing of Inactive and Deficit Projects.

If you have any questions or need additional information, please contact me at (858) 495-5802 or at heather.steven@sdcounty.ca.gov.

Sincerely,



Heather Steven, Project Manager
Project Planning Division

cc:

New West Investment Inc., Greg Brown, 565 N. Magnolia Avenue, El Cajon, CA 92020
Enviromine Inc., Warren Coalson and Dennis Fransway, 3511 Camino Del Rio S., Suite 403, San Diego, CA 92108
Wayne Chang, P.O. Box 9496 Rancho Santa Fe, CA 92067-4496

email cc:

Bronwyn Brown, Planning Manager, PDS
Valle De Oro Community Planning Group
Jamul/Dulzura Community Planning Group

SCOPING LETTER MATRIX

Attachment	Item
A	Project Issue Checklist
B	Estimate of Discretionary Processing Time and Cost
C	Memorandums of Understanding
D	Planning Analysis
E	Scope for Visual Resources & Aesthetics
F	Scope for Agricultural Resources
G	Scope for Air Quality Analysis
H	Scope of Biological Resources Report/Letter Report
I	Scope for Cultural Resources
J	Paleontological Resources Conditions
K	Scope for Geologic Investigation/Reconnaissance Report
L	Scope for Hazardous Materials Use/Storage Onsite
M	Scope for Groundwater Resources
N	Scope for Mineral Resources
O	Scope for Noise Impact Analysis
P	Scope for Climate Change
Q	Caltrans Letter, dated December 10, 2018
R	Sweetwater Authority, dated December 13, 2018

ATTACHMENT A
PROJECT ISSUE CHECKLIST

The Project Issue Checklist that follows details the specific changes and comments that are required to proceed with your project application. This checklist will be used throughout the process to track requests for information and satisfaction of project requirements.

Please note that the resubmittal of requested information must be accompanied by a separate letter addressing each item in the Project Issue Checklist. The letter must explain in detail how the comment was addressed and where (e.g. in what documents, where on the map/plot plan, etc.). County staff will use this letter to verify whether each comment in the checklist has been adequately addressed. If you have any questions about any of the comments in the checklist, please contact your project manager.

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE			PDS2018-MUP-18-023, PDS2018-RP-18-001			
Planning & Development Services Planning and CEQA Comments						
Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
1- 1		Major Project Issue	<p>Consistency with the San Diego County General Plan: Staff has provided a list of the General Plan goals and policies that need to be addressed as part of the project application and will require a qualitative and quantitative analysis. The list includes goals and policies from all the General Plan Elements along with policies from the Valle De Oro Community Plan and goals and objectives from the Rancho San Diego Specific Plan. The project will be reviewed to ensure consistency with the General Plan and a final General Plan consistency determination will be made after the project description is clearly defined and the environmental analysis is complete and finalized. Staff cannot move forward with a recommendation of approval until the project is found consistent with all applicable General Plan and community plan policies.</p> <p>Please see the attached Project Issue Checklist for a list of the goals and policies that need to be addressed.</p>		11/8/2018 5/31/19	
1- 2		Major Project Issue	<p>Land Use/Community Character Consistency: The character of the area is single-family residential and the project request is for a sand mining, an extractive use. Additionally, there are two major components of the Rancho Specific Plan recreation system including Cottonwood Golf Course. The Specific Plan identifies the golf course serving as a buffer area and providing a larger setback to sensitive habitat areas. In order to assess the potential impacts to community character a land use and community character analysis shall be prepared for the proposed project. Please see Attachment D for Scoping requirements. Please see Attachment D for Scoping requirements.</p>		11/8/2018 5/31/19	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
1- 3		Major Project Issue	<p>Major Use Permit (MUP) Findings: A Major Use Permit will also be required for the proposed Mining Operations (Extractive Use) pursuant to Sections 2805.c. and 2905.d. In accordance with Section 7358 of the Zoning Ordinance, it shall be found:</p> <p>a. That the location, size, design, and operating characteristics of the proposed use will be compatible with adjacent uses, residents, buildings, or structures, with consideration given to:</p> <ul style="list-style-type: none"> • Harmony in scale, bulk, coverage and density; • The availability of public facilities, services and utilities; • The harmful effect, if any, upon desirable neighborhood character; • The generation of traffic and the capacity and physical character of surrounding streets; • The suitability of the site for the type and intensity of use or development which is proposed; and to • Any other relevant impact of the proposed use; and <p>b. That the impacts, as described in paragraph "a" of this section, and the location of the proposed use will be consistent with the San Diego County General Plan.</p> <p>c. That the requirements of the California Environmental Quality Act have been complied with.</p> <p>Please provide additional, quantitative information that accurately describes the scale, bulk, coverage and intensity of the proposed sand mine. Please provide draft MUP Findings. Ongoing coordination between County staff and the applicant will be required to adequately address the MUP findings. Staff cannot recommend approval until all findings are made.</p>		11/8/2018 5/31/19	
		Major Project Issue	<p>MSCP Minor Amendment Area: A portion of the proposed project site is located within a designated Minor Amendment area. Minor amendments require concurrence from the California Department of Fish & Wildlife (CDFW) and the U.S. Fish & Wildlife Service (USFWS). Requests for Minor Amendments will be in coordination with the Wildlife Agencies (CDFW and USFWS) in conformance with all applicable laws and regulations.</p>		11/8/2018 5/31/19	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
1-	5	Major Project Issue	<p>Biological Resource Constraints: The site contains jurisdictional waters of the U.S./State and/or wetlands protected by the Resource Protection Ordinance (RPO). Impacts to jurisdictional waters will require permitting the authorizing resource agencies and/or compliance with the RPO as appropriate.</p> <p>Several federally endangered and/or threatened species have been identified on the project site or within the vicinity of the project. The site may contain species that are not covered by the South County Multiple Species Conservation Program (MSCP) Subarea Plan, such as Quino checkerspot butterfly and San Diego fairy shrimp (per 2006 code case). Impacts to such species may require a Section 7 consultation or Section 10 permit from the U.S. Fish and Wildlife Service.</p>		11/8/2018 5/31/19	
	6	Major Project Issue	<p>Visual Resources: Based on an initial review, it appears that proposed project may adversely affect visual resources. Willow Glen Drive is designated as a County Scenic Road. Views from scenic vistas, scenic highways and County Scenic Routes, and public recreation areas will need to be analyzed further to determine the extent of any adverse impacts. Visual resources can include narrow or expansive views, views from one site or from a series of sites as along a scenic highway and views above, at eye level, or from below. A Visual Resources Study is required. The report should identify changes/modifications of the project from the original and provide mitigation and design considerations to reduce the visual impacts associated with this project. The recommended mitigation and design considerations should be incorporated into the project design.</p> <p><input type="checkbox"/></p>		11/8/2018 5/31/19	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
2-	1	CEQA	California Environmental Quality Act: The project has a potential to result in significant impacts on the environmental for several issue areas, including (but not limited to) biology, hydrology, and visual resources. Where there are impacts that cannot be minimized to a less-than-significant level without imposing an alternative design, implications and the reasons why the project is being proposed must be described. Staff will continue to evaluate the proposed design and mitigation potential as the project progresses. At this time, further information in the form of technical studies/reports is required to determine your project's potential impacts on the environment, which will then be utilized to complete the Initial Study. The Initial Study will then be used to determine whether a Mitigated Negative Declaration or Environmental Impact Report will be necessary for your project. All impacts must be determined to be mitigated to a less-than-significant level in order to prepare a Mitigated Negative Declaration; otherwise, an Environmental Impact Report will be required. Additional copies of the final technical report(s) will be required when your project's environmental documents are circulated for public review. The reasons for this determination and the required information are detailed in the attachments to this letter.		11/8/2018 5/31/19	
	2	CEQA	Noise: The proposed mining operation is subject to the one-hour average 75 dBA property line requirement pursuant to the County Noise Ordinance, Section 36.404. Combined noise levels from the mining/extractive uses and additional truck traffic has a potential to expose off-site existing residences to direct and cumulative noise impacts. A noise study will be required to demonstrate compliance with the County Noise Ordinance and County Noise Element.		11/8/2018 5/31/19	
	3	CEQA	Air Quality: The project has the potential to significantly contribute to the violation of an air quality standard or significantly contribute to an existing or projected air quality violation, primarily related to ground disturbance, construction equipment, and on-road mobile sources associated with the mineral extraction process. Therefore, the project is required to discuss the project's potential impacts to air quality. An Air Quality technical study must be prepared for the proposed project. Additionally, emissions from the proposed project have the potential to affect sensitive receptors within the Jamacha Valley and along truck haul routes. Impacts to sensitive receptors must be evaluated through a health risk assessment that analyzes onsite emissions as well as emissions from haul trucks traveling to and from the site. The analysis must include all feasible mitigation measures to reduce significant impacts.		11/8/2018 5/31/19	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE			PDS2018-MUP-18-023, PDS2018-RP-18-001			
Planning & Development Services Planning and CEQA Comments						
Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
2- 4		CEQA	<p>Altered Hydrogeologic Conditions:</p> <p>The project, situated within the Sweetwater River watershed and in the floodplain of the Sweetwater River, includes mining sand suitable for Portland Cement Concrete use. The project is proposing to excavate mineral resources within a shallow alluvial valley. Excavation below the water table may occur which may alter the hydrogeologic conditions and result in evaporative losses of groundwater. The potential for evaporative losses needs to be quantified to determine any potential groundwater investigation requirements. Additionally, excavation is proposed to occur in a stream channel that is used to transfer water from Loveland Reservoir to Sweetwater Reservoir under the supervision of Sweetwater Authority. It is recommended to coordinate with Sweetwater Authority early in the process to determine any issues or requirements.</p> <p>Additionally, the project will require floodway delineation and acceptance by Federal Emergency management Agency (FEMA). The project will require a Conditional Letter of Map Revision (CLOMR) prior to grading. At the completion of the project, a Letter of map Revision (LOMR) will be required.</p>		11/8/2018 5/31/19	
3- 0		Project Description	Pending additional comments in this letter, submittal of technical studies, updates to Plot Plan, Reclamation Plan, the project description should be updated to reflect the most current project description. Please see staff edits to the Project Description in word document.		11/8/2018 5/31/19	
3- 1		Project Description	Provide a revised table highlighting all APN's and identifying the existing and proposed Land Use Designation and Zoning. All offsite work needs to be included. Please include all offsite APNs.	Resolved	11/8/18	5/31/19
3- 2		Project Description	Please provide a project history outlining previous approvals and previous CEQA documents. Please see staff edits to the Project Description in word document.		11/8/2018 5/31/19	
3- 3		Project Description	Please provide a table summary outlining the project specific components. Please quantify and identify total square footage and dimensions for each structure (i.e. processing plant, loadout facility, golfclub structures, parking for both Golf Course and Mining). Within this table add which phase will propose and remove structures. Identify how many parking spaces are assigned to the Golf Course and the Mining Project. Please see staff edits to the Project Description in word document.		11/8/2018 5/31/19	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
3-	4	Project Description	Page 1 of the Project Description describes the golf course operations will continue as mining is completed in phases. Please can you elaborate on what part of the golf course will be operating during Phase 1? (Describe the Lakes and Ivanhoe golf course) Please provide additional discussion on the components associated to the golf course and what additional changes will be occurring to the golf club facilities and operations (including parking, hours of operation, and occupancy). Please see staff edits to the Project Description in word document.		11/8/2018 5/31/19	
3-	5	Project Description	Please expand within the Existing Land Entitlements Section on the permitted existing structures, golf holes, parking, hours of operation and occupancy. Outline the associated MUP Modification for the golf course management instructional facility and the additional area that was added to the golf course. A RPO Open Space Easement was included as part of this MUP Modification. Additionally please include discussion on the Rancho San Diego Specific Plan. Please see staff edits to the Project Description in word document.		11/8/2018 5/31/19	
3-	6	Project Description	Because the Golf Course is being downsized, please elaborate in detail on project operations, facilities and staffing. Identify the amount parking that will be provided, access and logistics with having a proposed mining operation onsite. Describe in which phase, when golfclub structures will be removed. Please see staff edits to the Project Description in word document.		11/8/2018 5/31/19	
3-	7	Project Description	The project proposes to have material sales and transporation on Saturdays from 5:00am to 1:00pm. Clarify if any mining operations is expected to occur during weekends or outside typical work hours. This will help us identify any additional impacts such as noise levels or specific impacts to the existing road systems. The site will not be operating during weekends. The project description states Trucking operations during the week will operate from 4:00 am to 6:30 am. Please elaborate and include within Noise Analysis.		11/8/2018 5/31/19	
3-	8	Project Description	The project description describes the property as being zoned for extractive use. Due to the different zoning designations on the site, edits to this sentence are required based on the necessary discretionary permits that are required for this use. Please see staff edits to the Project Description in word document.		11/8/2018 5/31/19	
3-	9	Project Description	Areas disturbed by resources extraction will be progressively reclaimed. Please elaborate in more on the the proposed final land use and release of reclamation. Please see staff edits to the Project Description in word document.		11/8/2018 5/31/19	
3-	10	Project Description	The project description describes a 50-foot setback from Willow Glen Drive. Where does this requirement come from? The properties for this project are designated with a V/C/A setback designator. Additional information is required. Please see staff edits to the Project Description in word document.		11/8/2018 5/31/19	
3-	11	Project Description	The project description states that vegetation monitoring will continue for 3 years after reclamation. 5 years is standard. Please revise.	Resolved	11/8/18	5/31/2019

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
3-	12	Project Description	Revise project description with correct construction aggregate product. The executive summary and Section 3.2 Project Reserves quotes different quantities.	Resolved	11/8/18	5/31/2019
3-	13	Project Description	Identify the quantities required for backfill material. Please see staff edits to the Project Description in word document.		11/8/2018 5/31/19	
3-	14	Project Description	Identify which section of the Rancho San Diego Specific Plan restricts an Extractive use type to "Site Preparation". Please see staff edits to the Project Description in word document.	Resolved	11/8/18	5/31/2019
3-	15	Project Description	The project description states equipment will be located near the center of the project area, adjacent to Willow Glen Drive west of the existing parking lot. Please outline if this is for operations or for storage. Please see staff edits to the Project Description in word document.		11/8/2018 5/31/19	
3-	16	Project Description	The project description describes the topsoil and overburden removal scope. It outlines that revegetation will not be needed. Typical operations require All topsoil be stockpiled. Staff would need a study or an experience opinion to allow for this proposal. Please see staff edits to the Project Description in word document.		11/8/2018 5/31/19	
3-	17	Project Description	In phase 2, and phase 3, the conveyor/slurry line plans on utilizing existing golf cart river crossings to transport materials across the river channel. Please identify on previous approved plans where these river crossings are and if these were permitted.	Resolved	11/8/18	5/31/2019
3-	18	Project Description	Additional details are required on the operation equipment and duration. Please see staff edits to the Project Description in word document.		11/8/2018 5/31/19	
3-	19	Project Description	Please provide more information and the specifications for shielded night lighting. Please see staff edits to the Project Description in word document.		11/8/2018 5/31/19	
3-	20	Project Description	Additional information on water demand from the existing groundwater wells on the property is required. Please see staff edits to the Project Description in word document.		11/8/2018 5/31/19	
3-	21	Project Description	Identify which wells will not be used and will be abandoned. Please see staff edits to the Project Description in word document.		11/8/2018 5/31/19	
3-	22	Project Description	Specify locations of portable restrooms and two metal cargo containers for storage. Please see staff edits to the Project Description in word document.		11/8/2018 5/31/19	
3-	23	Project Description	Identify whether a small water system or vendor permit will be required for drinking water. Please see staff edits to the Project Description in word document.		11/8/2018 5/31/19	
3-	24	Project Description	Section 6185.e. Recycling of salvaged concrete, asphalt and rock. Please elaborate if the project is proposing to recycle salvaged concrete, asphalt and rock.	Resolved	11/8/18	5/31/2019
3-	25	Project Description	Provide the elevation for depth of excavation. Please see staff edits to the Project Description in word document.		11/8/2018 5/31/19	
3-	26	Project Description	Page 4 - All areas that are disturbed will be required to be revegetated with or without pending development. Please revise statement.	Resolved	11/8/18	5/31/2019

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
3- 27	Project Description	Page 7 - If inert fill is being imported, please elaborate on quantity and if this fill will be processed material or will be processed onsite? Coordination with Local Enforcement Agency (LEA) and the Regional Water Control Quality Board (RWCQB) will be required. Please see staff edits to the Project Description in word document.		11/8/2018 5/31/2019	
3- 28	Project Description	Page 13 - Topsoil will not be used to revegetate disturbed areas. Typical operations require all topsoil to be stockpiled. Additional analysis and justification is required to allow for this proposal. Please elaborate.		11/8/2018 5/31/2019	
3- 29	Project Description	The existing golf cart river crossings are proposing to be used for the project. These crossings may need further analysis and or permitting from Agencies based on a pending Biological Resources Report. Please revise and explain if additional analysis and permits are required.	Permits found from 1994	11/8/2018 5/31/2019	
3- 30	Project Description	A geotechnical report will be required to confirm if a 2:1 slope with a height of 20 feet can be supported. Figure 3.4-3 in the project description is inconsistent with the slopes outlined on Sheet 5 of the Plot Plan. Project Description has been revised. A geotechnical report will be required to confirm if a 3:1 slope with a height of 25 feet can be supported.		11/8/2018 5/31/2019	
3- 31	Project Description	Provide additional details on the settling basins. Exact location, how deep, below or above groundwater table.		11/8/2018 5/31/2019	
3- 32	Project Description	Confirm the maximum height of the stockpiling is 25-feet. Please see staff edits to the Project Description in word document.		11/8/2018 5/31/2019	
3- 33	Project Description	Page 25 - The proposed performance standards identify 50% cover (Section 4.3 Monitoring). This will need to be justified by the general conditions in the area. Revisions may be required after review of biological reports. Please see staff edits to the Project Description in word document.		11/8/2018 5/31/2019	
3- 34	Project Description	Pending additional comments in this letter, the project description should be updated to reflect the most current project description.		11/8/2018 5/31/2019	
3- 35	Project Description	Parcels 506-021-19-00 (8.2 acres) and 519-011-0300 (23.8 acres) have a zoning designation of S88, Specific Planning Area. Pursuant to Section 2885.b. of the Zoning Ordinance this zoning restricts extractive uses to site preparation which allows the off-site removal of materials when it is secondary to the future use of the site. Update Plot Plan and Figures within the Project Description and Reclamation Plan identifying zoning and showing proposed site preparation uses and label no mining within these areas. Plot plan, Reclamation Plan and Project Description must be consistent.		5/31/19	
3- 36	Project Description	Based on comments in this checklist and within the word document ensure the Project Description is updated within Reclamation Plan and technical studies.		5/31/19	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4-	1	General Plan Conformance	The project is required to conform to the County of San Diego General Plan and the Valley De Oro Community Plan Goals and Policies. Please provide a Planning Analysis. A project analysis of each applicable goal and policy is required. An analysis of the Community Development Model is required to show consistency with the County of San Diego General Plan. The following General Plan and Community Plan Policies are applicable:	Ongoing	11/8/2018 5/31/2019	
4-	2	General Plan Conformance	Policy LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.	Ongoing	11/8/2018 5/31/2019	
4-	3	General Plan Conformance	LU-1.6 Conversion of Public Lands to Private Ownership. Assign lands in public use an underlying designation of Rural Lands 80. When such lands are transferred to private ownership, the RL-80 designation shall apply until the appropriate long-term use of the property is determined and a general plan amendment is approved for redesignation of the property. This policy applies to areas on the Land Use Map designated Public/Semi-Public Facilities, Federal and State Lands, and Tribal Lands.	Ongoing	11/8/2018 5/31/2019	
4-	4	General Plan Conformance	LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.	Ongoing	11/8/2018 5/31/2019	
4-	5	General Plan Conformance	LU-2.6 Development near Neighboring Jurisdictions. Require that development in the proximity of neighboring jurisdictions retain the character of the unincorporated community and use buffers or other techniques where development in the neighboring jurisdiction is incompatible.	Ongoing	11/8/2018 5/31/2019	
4-	6	General Plan Conformance	Policy LU-2.8 Mitigation of Development Impacts. Require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, vibrations, dust, odor, aesthetic impairment, and/or are detrimental to human health and safety.	Ongoing	11/8/2018 5/31/2019	
4-	7	General Plan Conformance	LU-4.3 Relationship of Plans in Adjoining Jurisdictions. Consider the plans and projects of overlapping or neighboring agencies in the planning of unincorporated lands, and invite comments and coordination when appropriate.	Ongoing	11/8/2018 5/31/2019	
4-	8	General Plan Conformance	Policy LU-5.3: Rural Land Preservation. Ensure the preservation of existing open space and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) when permitting development under the Rural and Semi-Rural Land Use Designations.	Ongoing	11/8/2018 5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4-	9	General Plan Conformance	Policy LU-5.5: Projects that Impede Non-Motorized Travel. Ensure that development projects and road improvements do not impede bicycle and pedestrian access. Where impacts to existing planned routes would occur, ensure that impacts are mitigated and acceptable alternative routes are implemented.	Ongoing	11/8/2018 5/31/2019	
4-	10	General Plan Conformance	Policy LU-6.1 Environmental Sustainability. Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment.	Ongoing	11/8/2018 5/31/2019	
4-	11	General Plan Conformance	Policy LU-6.5 Sustainable Stormwater Management. Ensure that development minimizes the use of impervious surfaces and incorporates other Low Impact Development techniques as well as a combination of site design, source control, and stormwater best management practices, where applicable and consistent with the County's LID Handbook.	Ongoing	11/8/2018 5/31/2019	
4-	12	General Plan Conformance	LU-6.6: Integration of Natural Features into Project Design. Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources.	Ongoing	11/8/2018 5/31/2019	
4-	13	General Plan Conformance	LU-6.7 Open Space Network. Require projects with open space to design contiguous open space areas that protect wildlife habitat and corridors; preserve scenic vistas and areas; and connect with existing or planned recreational opportunities.	Ongoing	11/8/2018 5/31/2019	
4-	14	General Plan Conformance	LU-6.8 Oversight of Open Space. Require that open space associated with future development that is intended to be preserved in perpetuity either be: 1) Retained in private ownership of the property owner or a third party with a restrictive easement that limits use of the land as appropriate; or 2) Transferred into public ownership of an agency that manages preserved open space. The owner of the open space will be responsible for the maintenance and any necessary management unless those responsibilities are delegated through an adopted plan or agreement. Restrictive easements shall be dedicated to the County or a public agency (approved by the County) with responsibilities that correspond with the purpose of the open space. When transferred to a third party or public agency, a funding mechanism to support the future maintenance and management of the property should be established to the satisfaction of the County.	Ongoing	11/8/2018 5/31/2019	
4-	15	General Plan Conformance	Policy LU-6.9: Development Conformance with Topography. Require development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of a site; and to utilize natural drainage and topography in conveying stormwater to the maximum extent practicable.	Ongoing	11/8/2018 5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4-	16	General Plan Conformance	Policy LU-6.10: Protection from Hazards. Require that development be located and designed to protect property and residents from the risks of natural and man-induced hazards.	Ongoing	11/8/2018 5/31/2019	
4-	17	General Plan Conformance	LU-6.12 Flooding. Document and annually review areas within floodways and 100- and 200-year floodplains to ensure areas subject to flooding are accurately mapped in accordance with AB 162 (enacted January 1, 2008). (See also Policy S-9.1)	Ongoing	11/8/2018 5/31/2019	
4-	18	General Plan Conformance	LU-7.1 Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.	Ongoing	11/8/2018 5/31/2019	
4-	19	General Plan Conformance	Policy LU-8.2: Groundwater Resources. Require development to identify adequate groundwater resources in groundwater-dependent areas, as follows: <ul style="list-style-type: none"> • In areas dependent on currently identified groundwater overdrafted basins, prohibit new development from exacerbating overdraft conditions. • Encourage programs to alleviate overdraft conditions in Boulevard. • In areas without current overdraft groundwater conditions, prohibit new groundwater-dependent development where overdraft conditions are foreseeable. 	Ongoing	11/8/2018 5/31/2019	
4-	20	General Plan Conformance	Policy LU-8.3: Groundwater Dependent Habitat. Discourage development that would significantly draw down the groundwater table to the detriment of groundwater-dependent habitat, except in the Borrego Valley.	Ongoing	11/8/2018 5/31/2019	
4-	21	General Plan Conformance	Policy LU-10.2: Development–Environmental Resource Relationship. Require development in semi-rural and rural areas to respect and conserve the unique natural features and rural character and avoid sensitive or intact environmental resources and hazard areas.	Ongoing	11/8/2018 5/31/2019	
4-	22	General Plan Conformance	Policy LU-12.1: Concurrence of Infrastructure and Services with Development. Require the provision of infrastructure, facilities, and services needed by new development prior to that development, either directly or through fees. Where appropriate, the construction of infrastructure and facilities may be phased to coincide with project phasing.	Ongoing	11/8/2018 5/31/2019	
4-	23	General Plan Conformance	Policy LU-12.2: Maintenance of Adequate Services. Require development to mitigate significant impacts to existing service levels of public facilities or services for existing residents and businesses. Provide improvements for Mobility Element roads in accordance with the Mobility Element Network Appendix matrices, which may result in ultimate build-out conditions that achieve an improved Level of Service (LOS) but do not achieve a LOS of D or better.	Ongoing	11/8/2018 5/31/2019	
4-	24	General Plan Conformance	Policy LU-13.2: Commitment of Water Supply. Require new development to identify adequate water resources, in accordance with state law, to support the development prior to approval.	Ongoing	11/8/2018 5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE			PDS2018-MUP-18-023, PDS2018-RP-18-001			
Planning & Development Services Planning and CEQA Comments						
Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4-	25	General Plan Conformance	Policy M-3.3 Multiple Ingress and Egress. Require development to provide multiple ingress/egress routes in conformance with State law, and local regulations.	Ongoing	11/8/2018 5/31/2019	
4-	26	General Plan Conformance	Policy M-4.4 Accommodate Emergency Vehicles. Design and construct public and private roads to allow for necessary access for appropriately sized fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents.	Ongoing	11/8/2018 5/31/2019	
4-	27	General Plan Conformance	Policy M-10.7 Parking Area Design for Stormwater Runoff. Require that parking areas be designed to reduce pollutant discharge and stormwater runoff through site design techniques such as permeable paving, landscaped infiltration areas, and unpaved but reinforced overflow parking areas that increase infiltration. Require parking areas located within or adjacent to preserve areas to also include native landscaping and shielded lighting.	Ongoing	11/8/2018 5/31/2019	
4-	28	General Plan Conformance	Policy COS-2.2 Habitat Protection through Site Design. Require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design.	Ongoing	11/8/2018 5/31/2019	
4-	29	General Plan Conformance	Policy COS-3.1 Wetland Protection. Require development to preserve existing natural wetland areas and associated transitional riparian and upland buffers and retain opportunities for enhancement.	Ongoing	11/8/2018 5/31/2019	
4-	30	General Plan Conformance	Policy COS-3.2: Minimize Impacts of Development. Require development projects to: • Mitigate any unavoidable losses of wetlands, including its habitat functions and values; and • Protect wetlands, including vernal pools, from a variety of discharges and activities, such as dredging or adding fill material, exposure to pollutants such as nutrients, hydromodification, land and vegetation clearing, and the introduction of invasive species.	Ongoing	11/8/2018 5/31/2019	
4-	31	General Plan Conformance	Policy COS-4.1 Water Conservation. Require development to reduce the waste of potable water through use of efficient technologies and conservation efforts that minimize the County's dependence on imported water and conserve groundwater resources.	Ongoing	11/8/2018 5/31/2019	
4-	32	General Plan Conformance	COS-4.2 Drought-Efficient Landscaping. Require efficient irrigation systems and in new development encourage the use of native plant species and non-invasive drought tolerant/low water use plants in landscaping.	Ongoing	11/8/2018 5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4-	33	General Plan Conformance	Policy COS-5.1 Impact to Floodways and Floodplains. Restrict development in floodways and floodplains in accordance with policies in the Flood Hazards section of the Safety Element. Development in floodways and floodplains has the potential to alter natural hydrologic flow and cause soil erosion and increased stormwater runoff—including loss of wetland and health issues related to surface and groundwater contamination. <u>This policy will be evaluated through the Stormwater Management Plan and Drainage Study.</u>	Ongoing	11/8/2018 5/31/2019	
4-	34	General Plan Conformance	Policy COS-5.2 Impervious Surfaces. Require development to minimize the use of directly connected impervious surfaces and to retain stormwater run-off caused from the development footprint at or near the site of generation.	Ongoing	11/8/2018 5/31/2019	
4-	35	General Plan Conformance	Policy COS-5.3 Downslope Protection. Require development to be appropriately sited and to incorporate measures to retain natural flow regimes, thereby protecting downslope areas from erosion, capturing runoff to adequately allow for filtration and/or infiltration, and protecting downstream biological resources.	Ongoing	11/8/2018 5/31/2019	
4-	36	General Plan Conformance	Policy COS-5.5 Impacts of Development to Water Quality. Require development projects to avoid impacts to the water quality in local reservoirs, groundwater resources, and recharge areas, watersheds, and other local water sources.	Ongoing	11/8/2018 5/31/2019	
4-	37	General Plan Conformance	Policy COS-7.1 Archaeological Protection. Preserve important archaeological resources from loss or destruction and require development to include appropriate mitigation to protect the quality and integrity of these resources.	Ongoing	11/8/2018 5/31/2019	
4-	38	General Plan Conformance	Policy COS-7.3 Archaeological Collections. Require the appropriate treatment and preservation of archaeological collections in a culturally appropriate manner.	Ongoing	11/8/2018 5/31/2019	
4-	39	General Plan Conformance	Policy COS-9.1 Preservation. Require the salvage and preservation of unique paleontological resources when exposed to the elements during excavation or grading activities or other development processes.	Ongoing	11/8/2018 5/31/2019	
4-	40	General Plan Conformance	Policy COS-9.2 Impacts of Development. Require development to minimize impacts to unique geological features from human related destruction, damage, or loss.	Ongoing	11/8/2018 5/31/2019	
4-	41	General Plan Conformance	Policy COS-11.1: Protection of Scenic Resources. Require the protection of scenic highways, corridors, regionally significant scenic vistas, and natural features, including prominent ridgelines, dominant landforms, reservoirs, and scenic landscapes.	Ongoing	11/8/2018 5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4- 42	General Plan Conformance	Policy COS-11.3: Development Siting and Design. Require development within visually sensitive areas to minimize visual impacts and to preserve unique or special visual features, particularly in rural areas, through the following: <ul style="list-style-type: none"> • Creative site planning • Integration of natural features into the project • Appropriate scale, materials, and design to complement the surrounding natural landscape • Minimal disturbance of topography • Clustering of development so as to preserve a balance of open space vistas, natural features, and community character. • Creation of contiguous open space networks 	Ongoing	11/8/2018 5/31/2019	
4- 43	General Plan Conformance	COS-13.1 Restrict Light and Glare. Restrict outdoor light and glare from development projects in Semi-Rural and Rural Lands and designated rural communities to retain the quality of night skies by minimizing light pollution.	Ongoing	11/8/2018 5/31/2019	
4- 44	General Plan Conformance	Policy COS 14.7: Alternative Energy Sources for Development Projects. Encourage development projects that use energy recovery, photovoltaic, and wind energy.	Ongoing	11/8/2018 5/31/2019	
4- 45	General Plan Conformance	COS-14.8 Minimize Air Pollution. Minimize land use conflicts that expose people to significant amounts of air pollutants.	Ongoing	11/8/2018 5/31/2019	
4- 46	General Plan Conformance	Policy COS 14.9: Significant Producers of Air Pollutants. Require projects that generate potentially significant levels of air pollutants and/or GHGs such as quarries, landfill operations, or large land development projects to incorporate renewable energy, and the best available control technologies and practices into the project design.	Ongoing	11/8/2018 5/31/2019	
4- 47	General Plan Conformance	Policy COS 14.10: Low-Emission Construction Vehicles and Equipment. Require County contractors and encourage other developers to use low emission construction vehicles and equipment to improve air quality and reduce GHG emissions.	Ongoing	11/8/2018 5/31/2019	
4- 48	General Plan Conformance	Policy COS-14.11 Native Vegetation. Require development to minimize the vegetation management of native vegetation while ensuring sufficient clearing is provided for fire control.	Ongoing	11/8/2018 5/31/2019	
4- 49	General Plan Conformance	Policy COS 15.6: Design and Construction Methods. Require development design and construction methods to minimize impacts to air quality.	Ongoing	11/8/2018 5/31/2019	
4- 50	General Plan Conformance	Policy COS-17.2 Construction and Demolition Waste. Require recycling, reduction and reuse of construction and demolition debris.	Ongoing	11/8/2018 5/31/2019	
4- 51	General Plan Conformance	Policy COS 18.1: Alternate Energy Systems Design. Work with San Diego Gas and Electric and non utility developers to facilitate the development of alternative energy systems that are located and designed to maintain the character of their setting.	Ongoing	11/8/2018 5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4-	52	General Plan Conformance	Policy S-3.1 Defensible Development. Require development to be located, designed, and constructed to provide adequate defensibility and minimize the risk of structural loss and life safety resulting from wildland fires.	Ongoing	11/8/2018 5/31/2019	
4-	53	General Plan Conformance	Policy S-3.3 Minimize Flammable Vegetation. Site and design development to minimize the likelihood of a wildfire spreading to structures by minimizing pockets or peninsulas, or islands of flammable vegetation within a development.	Ongoing	11/8/2018 5/31/2019	
4-	54	General Plan Conformance	Policy S-3.6 Fire Protection Measures. Ensure that development located within fire threat areas implement measures that reduce the risk of structural and human loss due to wildfire.	Ongoing	11/8/2018 5/31/2019	
4-	55	General Plan Conformance	Policy S-3.7: Fire Resistant Construction. Require all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes and establish and enforce reasonable and prudent standards that support retrofitting of existing structures in high fire threat areas.	Ongoing	11/8/2018 5/31/2019	
4-	56	General Plan Conformance	Policy S-6.1: Water Supply. Ensure that water supply systems for development are adequate to combat structural and wildland fires.	Ongoing	11/8/2018 5/31/2019	
4-	57	General Plan Conformance	Policy S-6.3: Funding Fire Protection Services. Require development to contribute its fair share towards funding the provision of appropriate fire and emergency medical services as determined necessary to adequately serve the project.	Ongoing	11/8/2018 5/31/2019	
4-	58	General Plan Conformance	Policy S-7.1 Development Location. Locate development in areas where the risk to people or resources is minimized. In accordance with the California Department of Conservation Special Publication 42, require development be located a minimum of 50 feet from active or potentially active faults, unless an alternative setback distance is approved based on geologic analysis and feasible engineering design measures adequate to demonstrate that the fault rupture hazard would be avoided.	Ongoing	11/8/2018 5/31/2019	
4-	59	General Plan Conformance	Policy S-9.2: Development in Floodplains. Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.	Ongoing	11/8/2018 5/31/2019	
4-	60	General Plan Conformance	Policy S-10.4 Stormwater Management. Require development to incorporate low impact design, hydromodification management, and other measures to minimize stormwater impacts on drainage and flood control facilities.	Ongoing	11/8/2018 5/31/2019	
4-	61	General Plan Conformance	Policy S-10.5 Development Site Improvements. Require development to provide necessary on- and off-site improvements to stormwater runoff and drainage facilities.	Ongoing	11/8/2018 5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE			PDS2018-MUP-18-023, PDS2018-RP-18-001			
Planning & Development Services Planning and CEQA Comments						
Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4-	62	General Plan Conformance	Policy S-11.5 Development Adjacent to Agricultural Operations. Require development adjacent to existing agricultural operations in Semi-Rural and Rural Lands to adequately buffer agricultural areas and ensure compliance with relevant safety codes where pesticides or other hazardous materials are used.	Ongoing	11/8/2018 5/31/2019	
4-	63	General Plan Conformance	Policy N-1.1: Noise Compatibility Guidelines. Use the Noise Compatibility Guidelines (Table N 1) and the Noise Standards (Table N 2) as a guide in determining the acceptability of exterior and interior noise for proposed land uses.	Ongoing	11/8/2018 5/31/2019	
4-	64	General Plan Conformance	Policy N-1.2: Noise Management Strategies. Require the following strategies as higher priorities than construction of conventional noise barriers where noise abatement is necessary: o Avoid placement of noise sensitive uses within noisy areas o Increase setbacks between noise generators and noise sensitive uses o Orient buildings such that the noise sensitive portions of a project are shielded from noise sources o Use sound attenuating architectural design and building features o Employ technologies when appropriate that reduce noise generation (i.e. alternative pavement materials on roadways)	Ongoing	11/8/2018 5/31/2019	
4-	65	General Plan Conformance	Policy N-2.1 Development Impacts to Noise Sensitive Land Uses. Require an acoustical study to identify inappropriate noise level where development may directly result in any existing or future noise sensitive land uses being subject to noise levels equal to or greater than 60 CNEL and require mitigation for sensitive uses in compliance with the noise standards listed in Table N-2.	Ongoing	11/8/2018 5/31/2019	
4-	66	General Plan Conformance	Policy N-3.1: Groundborne Vibration. Use the Federal Transit Administration and Federal Railroad Administration guidelines, where appropriate, to limit the extent of exposure that sensitive uses may have to groundborne vibration from trains, construction equipment, and other sources.	Ongoing	11/8/2018 5/31/2019	
4-	67	General Plan Conformance	Policy N-4.1: Traffic Noise. Require that projects proposing General Plan amendments that increase the average daily traffic beyond what is anticipated in this General Plan do not increase cumulative traffic noise to off site noise sensitive land uses beyond acceptable levels.	Ongoing	11/8/2018 5/31/2019	
4-	68	General Plan Conformance	Policy N-6.2 Recurring Intermittent Noise. Minimize impacts from noise in areas where recurring intermittent noise may not exceed the noise standards listed in Table N-2.	Ongoing	11/8/2018 5/31/2019	
4-	69	General Plan Conformance	Policy N-6.4 Hours of Construction. Require development to limit the hours of operation as appropriate for non-emergency construction and maintenance.	Ongoing	11/8/2018 5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE			PDS2018-MUP-18-023, PDS2018-RP-18-001			
Planning & Development Services Planning and CEQA Comments						
Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4-	70	General Plan Conformance	Policy M-2.3 Environmentally Sensitive Road Design. Locate and design public and private roads to minimize impacts to significant biological and other environmental and visual resources. Avoid road alignments through floodplains to minimize impacts on floodplain habitats and limit the need for constructing flood control measures. Design new roads to maintain wildlife movement and retrofit existing roads for that purpose. Utilize fencing to reduce road kill and to direct animals to under crossings.	Ongoing	11/8/2018 5/31/2019	
4-	71	General Plan Conformance	Policy S-9 Protection of Life and Property. Minimized personal injury and property damage losses resulting from flood events.	Ongoing	11/8/2018 5/31/2019	
4-	72	General Plan Conformance	Policy S-9.2 Development in Floodplains. Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction. <u>This policy will be evaluated through the Stormwater Management Plan and Drainage Study.</u>	Ongoing	11/8/2018 5/31/2019	
4-	73	General Plan Conformance	Policy S-9.3 Development in Flood Hazard Areas. Require development within mapped flood hazard areas be sited and designed to minimize on and off-site hazards to health, safety, and property due to flooding. <u>This policy will be evaluated through the Stormwater Management Plan and Drainage Study.</u>	Ongoing	11/8/2018 5/31/2019	
4-	74	General Plan Conformance	Policy S-9.5 Development in Semi-Rural and Rural Lands within the Floodplain Fringe. Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization. <u>This policy will be evaluated through the Stormwater Management Plan and Drainage Study.</u>	Ongoing	11/8/2018 5/31/2019	
4-	75	General Plan Conformance	Policy S-10 Floodway and Floodplain Capacity. Floodways and floodplains that have acceptable capacity to accommodate flood events. <u>This policy will be evaluated through the Stormwater Management Plan and Drainage Study.</u>	Ongoing	11/8/2018 5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE			PDS2018-MUP-18-023, PDS2018-RP-18-001			
Planning & Development Services Planning and CEQA Comments						
Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4-	76	General Plan Conformance	<p>Policy S-10.1 Land Uses within Floodways. Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.</p> <p><u>This policy will be evaluated through the Stormwater Management Plan and Drainage Study.</u></p>	Ongoing	11/8/2018 5/31/2019	
4-	77	General Plan Conformance	<p>Policy S-10.2 Use of Natural Channels. Require the use of natural channels for County flood control facilities except where necessary to protect existing structures from a current flooding problem and where natural channel use is deemed infeasible. The alternative must achieve the same level of biological and other environmental protection, such as water quality, hydrology, and public safety.</p> <p><u>This policy will be evaluated through the Stormwater Management Plan and Drainage Study.</u></p>	Ongoing	11/8/2018 5/31/2019	
4-	78	General Plan Conformance	<p>Policy S-10.3 Flood Control Facilities. Require flood control facilities to be adequately sized, constructed, and maintained to operate effectively.</p> <p><u>This policy will be evaluated through the Stormwater Management Plan and Drainage Study.</u></p>	Ongoing	11/8/2018 5/31/2019	
4-	79	General Plan Conformance	<p>Policy S-10.4 Stormwater Management. Require development to incorporate low impact design, Hydromodification management, and other measures to minimize stormwater impacts on drainage and flood control facilities.</p> <p><u>This policy will be evaluated through the Stormwater Management Plan and Drainage Study.</u></p>	Ongoing	11/8/2018 5/31/2019	
4-	80	General Plan Conformance	<p>Policy S-10.5 Development Site Improvements. Require development to provide necessary on- and off-site improvements to stormwater runoff and drainage facilities.</p> <p><u>This policy will be evaluated through the Stormwater Management Plan and Drainage Study.</u></p>	Ongoing	11/8/2018 5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4- 81	General Plan Conformance	Policy S-10.6 Stormwater Hydrology. Ensure development avoids diverting drainages, increasing velocities, and altering flow rates to off-site areas to minimize adverse impacts to the area's existing hydrology. Increases in velocities and peak flow rates can result in flooding, erosion, and other problems downstream. Decreases can deprive biological resources of a needed water source. <u>This policy will be evaluated through the Stormwater Management Plan and Drainage Study.</u>	Ongoing	11/8/2018 5/31/2019	
5- 1	Valle De Oro Community Plan	Community Character Policy 4. Coordinate public facility capital improvement programs to ensure that all necessary services and facilities are provided in keeping with approved land use patterns and projected growth rates.	Ongoing	11/8/2018 5/31/2019	
5- 2	Valle De Oro Community Plan	Community Character Policy 6. Require landscaping, including trees, along all Mobility Element roads.	Ongoing	11/8/2018 5/31/2019	
5- 3	Valle De Oro Community Plan	Community Character Policy 7. Ensure that provisions for recreational facilities shall be concurrent with planned growth.		11/8/2018 5/31/2019	
5- 4	Valle De Oro Community Plan	Industrial Policy 3. All industrial activities shall provide buffering or screening when located adjacent to residential areas.		11/8/2018 5/31/2019	
5- 5	Valle De Oro Community Plan	Industrial Policy 4. Require strict regulation of all extraction industries to minimize dust, noise, traffic, unsightly views, undesirable accumulation of water, and safety and health hazards.	Ongoing	11/8/2018 5/31/2019	
5- 6	Valle De Oro Community Plan	Industrial Policy 5. Require specific guidelines for extraction operations and rehabilitation of the landscape.	Ongoing	11/8/2018 5/31/2019	
5- 7	Valle De Oro Community Plan	Industrial Policy 6. Support strict regulation of all extraction industries to ensure proper rehabilitation of the landscape.	Ongoing	11/8/2018 5/31/2019	
5- 8	Valle De Oro Community Plan	Open Space Policy 2. Incorporate public and semi-public owned land unsuitable for intense development into the open space/recreation system.	Ongoing	11/8/2018 5/31/2019	
5- 9	Valle De Oro Community Plan	Open Space Policy 4. Limit land uses in areas where natural hazards exist to very low residential densities, agriculture, or recreation.	Ongoing	11/8/2018 5/31/2019	
5- 8	Valle De Oro Community Plan	Open Space Policy 5. Utilize open space as a buffer between incompatible land uses.	Ongoing	11/8/2018 5/31/2019	
5- 10	Valle De Oro Community Plan	Open Space Policy 6. Buffer industrial and commercial land uses from surrounding residential uses.		11/8/2018 5/31/2019	
5- 11	Valle De Oro Community Plan	Open Space Policy 7. Require private development projects to provide open space dedications, which coincide or link with established or functional open space corridors, recreation locations, and conservation areas, as identified within this community plan.	Ongoing	11/8/2018 5/31/2019	
5- 12	Valle De Oro Community Plan	Open Space Policy 8. Open space areas shall be utilized in development projects to preserve sensitive habitat, steep slopes, or viewshed, or may be reserved for the use of the residents, or available for use by the general public. Developments that include open space areas shall provide for future control and maintenance of all open space areas.	Ongoing	11/8/2018 5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
5- 13	Valle De Oro Community Plan	Open Space Policy 9. Encourage the preservation of open space areas in which potential natural hazards exist (flood plains, fault lines, mudslides, etc).	Ongoing	11/8/2018 5/31/2019	
5- 14	Valle De Oro Community Plan	Open Space Policy 10. Require the planning and preservation of open space in public and private projects.	Ongoing	11/8/2018 5/31/2019	
5- 15	Valle De Oro Community Plan	Open Space Policy 11. Areas to be preserved as natural open space shall be included in open space easements.	Ongoing	11/8/2018 5/31/2019	
5- 16	Valle De Oro Community Plan	Community Design Policy 1. Encourage the utilization of local parks as one focus of community activity and the provision of open space between communities.	Ongoing	11/8/2018 5/31/2019	
5- 17	Valle De Oro Community Plan	Community Design Policy 2. Mature trees, shrubs, and significant land forms should be conserved in all public and private development projects.	Ongoing	11/8/2018 5/31/2019	
5- 18	Valle De Oro Community Plan	Community Design Policy 4. On-site and off-site advertising signs shall be strictly regulated and must complement the aesthetic value and unique character of the community.	Ongoing	11/8/2018 5/31/2019	
5- 19	Valle De Oro Community Plan	Community Design Policy 5. Require the provision of adequate, appropriate, off-street parking for all types of vehicles in all new developments.	Ongoing	11/8/2018 5/31/2019	
5- 20	Valle De Oro Community Plan	Community Design Policy 6. Encourage the maintenance of all private property, including prompt disposal of trash and abandoned vehicles.		11/8/2018 5/31/2019	
5- 21	Valle De Oro Community Plan	Community Design Policy 8. Require the under grounding of new and existing utility distribution facilities, including fiber-optic or cable lines, within the boundary or abutting street half-width right-of-way of any new subdivision or development.	Ongoing	11/8/2018 5/31/2019	
5- 22	Valle De Oro Community Plan	Community Design Policy 14. The following site design criteria shall be used for all industrial development in the plan area. a. Use of rooftop equipment is discouraged. All rooftop equipment must be screened from public view in a manner compatible with the architecture of the building. b. Trash collection and storage areas must be screened from public view. c. Appropriate screening from adjacent properties zoned for non-industrial uses shall consist of a six-foot high fence made of wood, masonry, or stucco material, and a minimum five-foot wide strip of dense landscaping. d. Parking located in the front of industrial sites shall be separated from any public or private road by a minimum five-foot landscaped strip (except for entryways). e. All industrial uses shall provide curb, gutter, and sidewalk improvements for parcel frontage along public and private streets. f. Additions to industrial buildings involving an increase of less than 50% of the existing floor area shall be exempt from the above requirements if a finding is made that such improvements are not physically feasible on the site without the demolition of existing structures.		11/8/2018 5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
5-	23	Valle De Oro Community Plan	Rancho San Diego Specific Plan: Continuing development of the Specific Plan area shall be developed under conditions A-E. See Valle De Oro Community Plan.	Ongoing	11/8/2018 5/31/2019	
5-	24	Valle De Oro Community Plan	Rancho San Diego Specific Plan - Commercial C.1: Industrial uses should be located in areas adjacent to existing industrial activities or in areas located adjacent to freeways or prime arterial roads and should not exceed three percent of the plan area.	Ongoing	11/8/2018 5/31/2019	
5-	25	Valle De Oro Community Plan	Rancho San Diego Specific Plan - Conservation D.1: Significant natural resources as identified in the community plan (see Resource Conservation areas) shall be conserved through open space easement dedication, limited recreation uses, or by any other appropriate means.	Ongoing	11/8/2018 5/31/2019	
5-	26	Valle De Oro Community Plan	Rancho San Diego Specific Plan - Conservation D.2: A system of open space, and recreation areas providing linkages, trails, and buffers within the specific planning areas shall be provided and protected.	Ongoing	11/8/2018 5/31/2019	
5-	27	Valle De Oro Community Plan	Rancho San Diego Specific Plan - Conservation D.3: The Sweetwater Reservoir and the Sweetwater River Floodplain shall be protected from urban development and the impacts of urban development such as urban runoff and wastewater.	Ongoing	11/8/2018 5/31/2019	
5-	28	Valle De Oro Community Plan	Rancho San Diego Specific Plan - Conservation D.4: Encourage the use of crib walls or contoured cut slopes to minimize visual impacts from grading on steep slopes.	Ongoing	11/8/2018 5/31/2019	
5-	29	Valle De Oro Community Plan	Rancho San Diego Specific Plan - Conservation D.5: AREA TO REMAIN UNDISTURBED. Based on the slope analysis submitted a fixed percentage of the land within each slope category shall remain undisturbed. The percent of undisturbed area required shall not be transferred from one category of slope to another, and areas devoted to roads, driveways, parking lots, patios or paved play areas shall not be included in the undisturbed area. The installation of a leach system and underground utilities may be included in the undisturbed area. The minimum requirements for undisturbed areas are identified on Page 24 of the Community Plan.	Ongoing	11/8/2018 5/31/2019	
5-	30	Valle De Oro Community Plan	Rancho San Diego Specific Plan - Conservation D.6: Any amendment to the Specific Plan for Rancho San Diego which eliminates or reduces an area designated as open space must include a corresponding increase in open space in the same neighborhood vicinity of the Specific Plan. The additional open space must be of at least equal size and of equal or greater value in protecting the various environmental and community character resources expressed in the Rancho San Diego Specific Plan concept.	Ongoing	11/8/2018 5/31/2019	
5-	31	Valle De Oro Community Plan	Mobility Policy 4. Require design of all road improvements that maximizes environmental and aesthetic considerations consistent with safety needs.	Ongoing	11/8/2018 5/31/2019	
5-	32	Valle De Oro Community Plan	Mobility Policy 5. Where practical, landscaping shall be provided within the right-of-way of major roads and prime arterials.	Ongoing	11/8/2018 5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
5- 33	Valle De Oro Community Plan	Mobility Policy 6. Require landscaping, including trees, along private property frontage of all Mobility Element roads wherever possible.	Ongoing	11/8/2018 5/31/2019	
5- 34	Valle De Oro Community Plan	Mobility Policy 11. Eliminate safety hazards caused by direct access of traffic onto major arterial or collector streets when reviewing projects along such streets.	Ongoing	11/8/2018 5/31/2019	
5- 35	Valle De Oro Community Plan	Mobility Policy 14. Encourage the creation of a system of non-motorized recreational trails to connect appropriate recreational facilities and to integrate this system with existing and proposed trails within the San Diego region.	Ongoing	11/8/2018 5/31/2019	
5- 36	Valle De Oro Community Plan	Conservation - Water Resources Policy 3. Encourage the strict regulation of the uses of water bodies within the planning area to ensure that such uses are compatible with existing ecosystems.	Ongoing	11/8/2018 5/31/2019	
5- 37	Valle De Oro Community Plan	Conservation - Water Resources Policy 6. Provide safe and efficient disposal of urban storm runoff to protect the Sweetwater Reservoir and floodplain areas of the Sweetwater River.	Ongoing	11/8/2018 5/31/2019	
5- 38	Valle De Oro Community Plan	Conservation - Water Resources Policy 7. Protect existing groundwater reserves for potential emergency use.	Ongoing	11/8/2018 5/31/2019	
5- 39	Valle De Oro Community Plan	Conservation - Water Resources Policy 8. All commercial, industrial, and agricultural land uses in the Sweetwater River area shall be analyzed and monitored to ensure that groundwater deposits and flows are not contaminated by these activities.		11/8/2018 5/31/2019	
5- 40	Valle De Oro Community Plan	Conservation - Water Resources Policy 9. The quality of groundwater in the Sweetwater River Area shall be monitored and analyzed to ensure that groundwater deposits and flows are not contaminated by commercial, industrial, and agricultural activities.	Ongoing	11/8/2018 5/31/2019	
5- 41	Valle De Oro Community Plan	Conservation - Water Resources Policy 12. Control urban runoff in the Sweetwater River basin in order to protect Sweetwater Reservoir and groundwater supplies from contamination.	Ongoing	11/8/2018 5/31/2019	
5- 42	Valle De Oro Community Plan	Conservation - Water Resources Policy 13. Only uses compatible with flooding, such as agriculture, parks, recreation, riding and hiking trails, and other open space activities shall be allowed in significant natural drainage areas.	Ongoing	11/8/2018 5/31/2019	
5- 43	Valle De Oro Community Plan	Conservation - Water Resources Policy 14. Include the following significant drainage areas as Resource Conservation Areas and apply the appropriate controls: a. The Sweetwater River Floodplain and identified contiguous high value habitats. (RCA No. 77)	Ongoing	11/8/2018 5/31/2019	
5- 44	Valle De Oro Community Plan	Conservation - Vegetation and Wildlife Habitats Policy 15. Require retention of native vegetation on significant portions of Specific Plans and Planned Developments over 10 acres in size.	Ongoing	11/8/2018 5/31/2019	
5- 45	Valle De Oro Community Plan	Conservation - Vegetation and Wildlife Habitats Policy 16. Require use of native species for landscaping where practical for public projects and private projects.	Ongoing	11/8/2018 5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
5-	46	Valle De Oro Community Plan	Conservation - Vegetation and Wildlife Habitats Policy 17. Use Land Use Element designations compatible with areas supporting unique vegetation and wildlife habitat resources.	Ongoing	11/8/2018 5/31/2019	
5-	47	Valle De Oro Community Plan	Conservation - Vegetation and Wildlife Habitats Policy 18. Conserve unique functional plant and wildlife habitats, particularly those supporting rare, endangered, or threatened or depleted species.	Ongoing	11/8/2018 5/31/2019	
5-	48	Valle De Oro Community Plan	Conservation - Vegetation and Wildlife Habitats Policy 20. Encourage the maintenance and enhancement of functional plant and wildlife habitats for threatened and endangered species.		11/8/2018 5/31/2019	
5-	49	Valle De Oro Community Plan	Conservation - Vegetation and Wildlife Habitats Policy 21. Protect wildlife refuge areas from noise impacts, outdoor lighting impacts, and pollution impacts from stormwater runoff.	Ongoing	11/8/2018 5/31/2019	
5-	50	Valle De Oro Community Plan	Conservation - Soil and Minerals Policy 22. Require development which is in harmony with existing topography and avoids extensive and severe grading.	Ongoing	11/8/2018 5/31/2019	
5-	51	Valle De Oro Community Plan	Conservation - Soil and Minerals Policy 23. Encourage strict standards to limit soil erosion and identify problem areas.	Ongoing	11/8/2018 5/31/2019	
5-	52	Valle De Oro Community Plan	Conservation - Night Sky Protection Policy 24. All outdoor lighting fixtures shall be shaded on top so that all light will shine downward.	Ongoing	11/8/2018 5/31/2019	
5-	53	Valle De Oro Community Plan	Conservation - Air Quality Policy 27. Encourage development plans which accommodate nonpolluting transportation.		11/8/2018 5/31/2019	
5-	54	Valle De Oro Community Plan	Conservation - Air Quality Policy 28. Encourage the identification and reduction of sources of air pollution affecting Valle de Oro.	Ongoing	11/8/2018 5/31/2019	
5-	55	Valle De Oro Community Plan	Conservation - Air Quality Policy 29. Discourage new sources of air pollution in the Valle de Oro area.	Ongoing	11/8/2018 5/31/2019	
5-	56	Valle De Oro Community Plan	Conservation - Air Quality Policy 30. Improve the air quality in the Valle de Oro Area by decreasing pollutants generated from or within the Valle de Oro area through implementation of the Regional Air Quality Strategy and the Community Plan.		11/8/2018 5/31/2019	
5-	57	Valle De Oro Community Plan	Scenic Highways Policy 1. Support the protection of the scenic highway corridors in Valle de Oro as designated in the County General Plan.	Ongoing	11/8/2018 5/31/2019	
5-	58	Valle De Oro Community Plan	Scenic Highways Policy 2. Scenic highway corridors in Valle de Oro are as follows: SR 94; SR-125 as an existing designated route; Jamacha Road/SR-54 from SR-94 to El Cajon; Fuerte Drive from I-8 to Chase Avenue; Willow Glen Drive, and Avocado Boulevard.	Ongoing	11/8/2018 5/31/2019	
5-	59	Valle De Oro Community Plan	Energy Policy Policy 2. Require site and building design which will maximize energy conservation.	Ongoing	11/8/2018 5/31/2019	
5-	60	Valle De Oro Community Plan	Public Safety Policy 6. Encourage the use of natural drainage areas and streambeds as flood control protection, thereby improving groundwater recharging.	Ongoing	11/8/2018 5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE			PDS2018-MUP-18-023, PDS2018-RP-18-001			
Planning & Development Services Planning and CEQA Comments						
Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
5-	61	Valle De Oro Community Plan	Noise Policy 2. Require site design and building design controls to minimize noise emissions from noise sources.	Ongoing	11/8/2018 5/31/2019	
5-	62	Valle De Oro Community Plan	Noise Policy 3. Encourage land use and circulation patterns which will minimize noise in residential neighborhoods and sensitive wildlife habitat.	Ongoing	11/8/2018 5/31/2019	
6-	1	Rancho San Diego Specific Plan	There are two major components of the Rancho San Diego Specific Plan recreation system including the Cottonwood Golf Course. As identified in the Specific Plan the golf course serves as part of a buffer area and gives a larger setback to sensitive habitat areas. A planning analysis will be required on how the proposed project meets the specific goals and objectives within the Rancho San Diego Specific Plan.	Ongoing	11/8/2018 5/31/2019	
6-	2	Rancho San Diego Specific Plan	Goal: Protect unique plant, wildlife and cultural resources from destruction or incompatible adjacent use.	Ongoing	11/8/2018 5/31/2019	
6-	3	Rancho San Diego Specific Plan	Objective 4.2 Preserve the sensitive resources within the RCAs designated on the Valle De Oro Community Plan by regulating appropriate adjacent land uses through the environmental review process.	Ongoing	11/8/2018 5/31/2019	
6-	4	Rancho San Diego Specific Plan	Objective 4.6: Protect riparian habitat used by Least Bell's viero from incompatible adjacent development and identify agencies or organizations which could maintain habitat.	Ongoing	11/8/2018 5/31/2019	
6-	5	Rancho San Diego Specific Plan	Objective 4.7: Identify and protect Black-tailed gnatcatcher nesting areas in a natural condition appropriately buffered from adjacent development.	Ongoing	11/8/2018 5/31/2019	
6-	6	Rancho San Diego Specific Plan	Goal: Maximize leisure-time opportunities with both natural parks and improved recreation facilities which will encourage active lifestyles for residents for all ages.	Ongoing	11/8/2018 5/31/2019	
6-	7	Rancho San Diego Specific Plan	Goal: Open Space areas shall be maintained so as to enhance the overall scenic quality and protect the landform integrity of Rancho San Diego.	Ongoing	11/8/2018 5/31/2019	
6-	8	Rancho San Diego Specific Plan	Objective 7.2: Open space maintenance should be determined at the time of adjacent implementing permit action. Envionmentally sensitive areas around and in the Sweetwater River floodplain should be transferred to public or private non-rofit ownership. Other open space areas should be the responsibility of community or neighborhood associations. Individual homeowner ownership of open space should be avoided unless no environmnetal harm from potential encroachment on open space areas is possible.	Ongoing	11/8/2018 5/31/2019	
7-	1	Zoning Ordinance	Zoning for the site is zoned Holding Area (S90), Open Space (S80), and Specific Plan (S88).	Informational Only	11/8/18	N/A

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE			PDS2018-MUP-18-023, PDS2018-RP-18-001			
Planning & Development Services Planning and CEQA Comments						
Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
7-	2	Zoning Ordinance	6708 PERMITTED FENCES, WALLS, GATES AND ENTRY STRUCTURES. No fence, wall, gate or entry structure shall be permitted unless it conforms to the criteria set forth below, except that the Board of Supervisors, the Planning Commission, or the Director, as a condition of approval of a matter under their jurisdiction, may require that a fence, wall or entry structure be constructed to a height greater than otherwise permitted by this section in order to mitigate against potential adverse effects. - Provide additional information on proposed fencing and gate entries.		11/8/2018 5/31/2019	
7-	3	Zoning Ordinance	Section 6762 of the Zoning Ordinance specifies the required parking required for a Golf Course. Please outline how the project complies with this Section. Because the project will be downsized to a 9-hole golf course, please demonstrate a parking summary that shows the required parking for the golf course.		11/8/2018 5/31/2019	
7-	4	Zoning Ordinance	6780 PARKING REQUIREMENTS: OTHER OCCUPANCIES AND USES Other occupancies, uses and buildings not specified elsewhere in the Parking Schedules. 3.3 Parking spaces per KSF GFA Bicycle Parking 0.1 Bike space per car space but not less than 3		11/8/2018 5/31/2019	
7-	5	Zoning Ordinance	Section 6185.e. Recycling of salvaged concrete, asphalt and rock. Please elaborate if the project is proposing to recycle salvaged concrete, asphalt and rock.	Resolved - Project has stated no recycling of salvaged concrete, asphalt and rock.	11/8/2018 5/31/2019	5/31/2019
7-	6	Zoning Ordinance	6554 REQUIRED PERMIT. No person shall conduct the activities described in Section 6552 without first obtaining a Major Use Permit as provided by the Use Permit Procedure commencing at Section 7350.	Information Only	11/8/2018 5/31/2019	N/A
7-	7	Zoning Ordinance	6556 REQUIRED RECLAMATION PLAN. No application for a Major Use Permit for mineral extraction shall be accepted for filing unless accompanied by an "Application for Reclamation Plan" as provided and described in the County Grading Ordinance. The decision to grant or deny the proposed Reclamation Plan shall be made at the same time as the decision to grant or deny the proposed Major Use Permit for the same project. Pursuant to the granting of the Major Use Permit, the permittee shall comply with all provisions and requirements of the Reclamation Plan in the conduct of mineral extraction activities and in the rehabilitation of the mining site.	Information Only	11/8/2018 5/31/2019	N/A

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
7- 8	Zoning Ordinance	2888 SPECIAL PROVISIONS AND LIMITATIONS: S88 USE REGULATIONS. a. Prior to adoption of a Specific Plan, a Major Use Permit may be granted pursuant to the S88 Use Regulations to authorize, for a specified period of time, any use not involving a significant investment in buildings, structures, or other improvements. Alternatively, a Major Use Permit may be granted for any use pursuant to a bonded agreement in an amount sufficient to ensure the removal of all buildings, structures, and other improvements within a specified time and/or under specified conditions when the decision-making body finds that such agreement will carry out the intent of this Ordinance and is enforceable by the County. Note: This section of the Zoning Ordinance is applicable to projects that have a Major Use Permit submitted prior to the adoption of a Specific Plan. This Section is not applicable to this project as the Rancho San Diego Specific Plan has been adopted.	Information Only	11/8/2018 5/31/2019	N/A
7- 9	Zoning Ordinance	Parcels 506-021-19-00 (8.2 acres) and 519-011-0300 (23.8 acres) have a zoning designation of S88, Specific Planning Area. Pursuant to Section 2885.b. of the Zoning Ordinance this zoning restricts extractive uses to site preparation which allows the off-site removal of materials when it is secondary to the future use of the site. Update Plot Plan and/or provide a new Figure within the Project Description identifying zoning and showing proposed site preparation uses and label no mining within these areas.		11/8/2018 5/31/2019	
8- 1	Board Policies	The following County Board of Supervisors Land Use Policies apply to this project: I-17 (Right-of-Way Dedication and Public Improvement Requirements in Connection with Zone reclassifications), I-18 (Right-of-Way Dedication and Public Improvement Requirements in Connection with Major and Minor Use Permits), I-68 (Proposed Projects in Flood Plains with Defined Floodways),	Informational Only	11/8/18	
9- 1	Applications	Please submit a Major Use Permit.		11/8/18	5/31/2019
9- 2	Applications	Please submit a Reclamation Plan		11/8/18	5/31/2019
9- 3	Applications	Please submit a Certificate of Compliance. In order to comply with the Subdivision Ordinance and Zoning Ordinance, the applicant must complete a Certificate of Compliance to merge the project parcels together.	Resolved- Certificate of Compliance will not be required as all lots will be included in the Major Use Permit	11/8/18	5/31/2019
9- 4	Application Form	Form 399-F Section 2 is incomplete. The form must be completed by the San Miguel Fire Protection District and resubmitted.		5/31/19	
9- 5	Application Form	Form 399-Sc Section 2 is incomplete. Verify with Grossmont Union High School District and Cajon Valley Union School District that school fees will not be required for the project. https://www.guhds.net/Departments/Business-Services/Facilities-and-Construction/Building-Fees/Pay-Fees/index.html https://www.cajonvalley.net/Page/13357 . If fees are required, have Section 2 of the form completed by the school districts		5/31/19	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
9- 6	Application Form	Form 399-S Section 2 is incomplete. Verify that there are no existing structures on the property that are connected to sewer service (existing golf club facilities, existing SFD that will be demolished, etc.). Clarify whether proposed future restroom facilities onsite for employees will be connected to a septic system. If any sewer connections or disconnections are required, have Section 2 of the form completed by the Spring Valley Sewer District.		5/31/19	
9- 7	Application Form	Form 399-W Section 2 is incomplete. The project proposes the use of well water. Verify that there are no existing structures on the property that are connected to municipal water service (existing golf club facilities, existing SFD that will be demolished, etc.). If any water connections or disconnections are required, have Section 2 of the form completed by the Otay Water District.		5/31/19	
10- 1	Plot Plan	Please provide a plot plan with the minimum plot plan requirements as specified in Form PDS-090, include all property line dimensions, all adjacent roads, including names, right-of-way widths, and indicate centerline locations, and all existing structures to be removed. http://www.sandiegocounty.gov/content/dam/sdc/pds/docs/pds090.pdf Additional		11/8/2018 5/31/2019	
10- 2	Plot Plan	Provide a Plot Plan which separate sheets that identify what is proposed and what is being removed during each of the phases. Delineate which structures are existing, proposed and propose to be demolished. Identify parking areas associated with the golf course and the mining operations.		11/8/2018 5/31/2019	
10- 3	Plot Plan	Include a Typical Plant Detail to show all structures including truck scales, parking area(s), equipment storage area(s), etc.		11/8/2018 5/31/2019	
10- 4	Plot Plan	As part of the plot plan package, please include elevations of all structures (including Fencing, gate access) and building elevations to show lighting, color, building materials, accessory equipment.		11/8/2018 5/31/2019	
10- 5	Plot Plan	Provide building coverage/square footage/acres/footprint table outlining the proposed components (Including temporary access roads, size of equipment, buildings, storage containers, portable restrooms. temporary staging, parking and laydown area).		11/8/2018 5/31/2019	
10- 6	Plot Plan	Please include all existing and proposed structures (Existing wells) on plot plan. Identify which ones will be used by the proposed project.		11/8/2018 5/31/2019	
10- 7	Plot Plan	Identify location and acres/square feet of temporary staging/storage areas for equipment and trucks during construction.		11/8/2018 5/31/2019	
10- 8	Plot Plan	Identify proposed temporary access roads. Will these temporary access roads be included as part of the revegetation plan? Show location, areas of disturbance, and access points. Please clarify if there are any temporary roads being proposed and label on plans.		11/8/2018 5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
10-	9	Plot Plan	Proposed slopes along the channel of Sweetwater River are shown at 2.0 to 1. These slopes may be too steep and could pose a public safety hazard. Please justify these proposed slope angles with additional geotechnical information.		11/8/18	5/31/2019
10-	10	Plot Plan	Please provide all existing easements. Call outs for Easements 5-8, 28, 37, 42, 46, 61, 68, 69 are not shown.		11/8/2018 5/31/2019	
10-	11	Plot Plan	Please delineate all setbacks on Plot Plan.		11/8/2018 5/31/2019	
10-	12	Plot Plan	Update Plot Plan with a Best Management Practices (BMP) for the access driveway areas.		11/8/2018 5/31/2019	
10-	13	Plot Plan	Provide a detail and cross section of the proposed access roads.		11/8/2018 5/31/2019	
10-	14	Plot Plan	Update Plot Plan to include locations of proposed fencing. Note: Parking Area: All parking areas of 5 or more parking spaces, (and driveways serving such parking areas) located on parcels abutting property in any residential zone shall be separated from such abutting property by a solid fence or wall 72 inches in height. Provide detail on parking area and proposed fencing. Delineate parking for the golf course and mining operation.		11/8/2018 5/31/2019	
10-	15	Plot Plan	Provide a sheet showing a close-up of the proposed storage facility and associated equipment.	Resolved	11/8/18	5/31/2019
10-	17	Plot Plan	Gate Entry - it is not clear where the proposed gate is being located. Please update to include.		11/8/2018 5/31/2019	
10-	18	Plot Plan	Update plot plan package to include proposed staging areas. Outline size of staging area(s).	Resolved	11/8/18	5/31/2019
10-	19	Plot Plan	Include the total MUP/RP boundary acreage, the total acreage of the excavation pit, the total acreage of each phase to be mined, and the total acreage of each of the pits to be filled east of the main mining pit. Phase acreage provided. Pit Acreage missing.		11/8/2018 5/31/2019	
10-	20	Plot Plan	Provide a Revegetation Plan: It needs to show where the various plant palletes are going to be to be planted. Please include total number of acres of each plant pallette by phase. Also include individual planting plan for any container plants and include performance standards pursuant to SMARA for each plant pallette to be used.		11/8/2018 5/31/2019	
10-	21	Plot Plan	Final plan will be required to be signed and stamped by R.C.E.	Informational, project will be conditioned accordingly	11/8/18	5/31/2019
10-	22	Plot Plan	Include specifications for access roads that that meet PDS Land Development and fire requirements. Current plan has no details.		11/8/2018 5/31/2019	
10-	23	Plot Plan	Include the community plan area on the front sheet.		11/8/2018 5/31/2019	
10-	24	Plot Plan	Include Zoning and General Plan designations on front sheet. General Plan Designations not shown.		11/8/2018 5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
10-	25	Plot Plan	Clarify how the Haul Roads will function through each of the four phases. Include haul road plan as project progresses through each of the phases. If haul roads are within the excavation area, add that note. Clarify whether trucks would have to travel on Willow Glen Road to bypass Steele Canyon Road bridge.		11/8/2018 5/31/2019	
10-	26	Plot Plan	The plans must show the 100-year floodplain and 100-year floodway on all sheets.		11/8/2018 5/31/2019	
10-	27	Plot Plan	If there any electrical utilities that are within the proposed excavation footprint. All utilities that will require re-routing require plans on how re-routing will occur.		11/8/2018 5/31/2019	
10-	28	Plot Plan	Plot plan should indicate all existing power poles to be removed/relocated out of mining area prior to the start of mining operations.		11/8/2018 5/31/2019	
10-	29	Plot Plan	Include proposed fencing around the mining area, golfcourse and along proposed trail easements. Please provide fencing location and detail on the plans.		11/8/2018 5/31/2019	
10-	30	Plot Plan	Plot Plan must show all areas proposed for stockpiling topsoil and wash fines during each phase of the mining operation. Indicate area and height of stockpiles. Identify height of stockpiling.		11/8/2018 5/31/2019	
10-	31	Plot Plan	Update Vicinity Map on Sheet 1 to state Willow Glen Drive.		11/8/18	5/31/2019
10-	32	Plot Plan	Parcels 506-021-19-00 (8.2 acres) and 519-011-0300 (23.8 acres) have a zoning designation of S88, Specific Planning Area. Pursuant to Section 2885.b. of the Zoning Ordinance this zoning restricts extractive uses to site preparation which allows the off-site removal of materials when it is secondary to the future use of the site. Update Plot Plan and or provide a new Figure within the Project Description and Reclamation Plan identifying zoning and showing proposed site preparation uses and label no mining within these areas.		5/31/2019	
10-	33	Plot Plan	Clearly label Steele Canyon Road and indicate the limits of the bridge above the areas of excavation.		5/31/2019	
10-	34	Plot Plan	Call out the distances from the edge of the excavation areas to the nearest adjacent residential properties.		5/31/2019	
10-	35	Plot Plan	Clearly delineate the area of the flowage channel throughout the project site and indicate the limits of the proposed excavation to demonstrate whether the flowage channel will be excavated. Update cross sections accordingly, if needed.		5/31/2019	
11-	1	Reclamation Plan	Please provide a Reclamation Plan. Pending submittal additional comments may be required.		11/8/18	N/A

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
11-	2	Reclamation Plan	Pending additional comments in this letter, submittal of technical studies, updates to Plot Plan, Reclamation Plan, the project description should be updated to reflect the most current project description. Please see staff edits within both the Project Description and the Reclamation Plan word document. Please ensure both documents are updated to reflect the same project description information.		5/31/2019	
11-	3	Reclamation Plan	Parcels 506-021-19-00 (8.2 acres) and 519-011-0300 (23.8 acres) have a zoning designation of S88, Specific Planning Area. Pursuant to Section 2885.b. of the Zoning Ordinance this zoning restricts extractive uses to site preparation which allows the off-site removal of materials when it is secondary to the future use of the site. Update Plot Plan and or provide a new Figure within the Project Description and Reclamation Plan identifying zoning and showing proposed site preparation uses and label no mining within these areas.		5/31/2019	
11-	4	General Considerations	Please indicate the property setbacks on the plot plan.		5/31/2019	
11-	5	General Considerations	Please make sure that all maps, diagrams, and/or calculations that are required to be prepared by a licensed California-licensed professional include the preparer's name, license number, signature, and seal (i.e. sheet 1 of plans and all technical studies/attachments).		5/31/2019	
11-	6	General Considerations	Please provide evidence that all landowners have been notified of the proposed use (i.e. owner signatures on page 12 and on sheet 1 of the plans).		5/31/2019	
11-	7	General Considerations	Please note that the 'statement of responsibility' on page 38 will need to be furnished with the operator's signature before taking the project to a decision.	Informational	5/31/2019	
11-	8	General Considerations	Please indicate whether mining operations involve underground openings (i.e. portals, shafts, tunnels, or other openings). If so, they will need to be gated or protected from public entry.		5/31/2019	
11-	9	Geology and Geotechnical	Please provide evidence that the designed steepness and treatment of final slopes consider the physical properties of slope materials, maximum water content, and revegetation. Page 26 references geotechnical recommendations in the "attached Geotechnical Report, Attachment C." Please include this in the reclamation plan for our review. Please also make sure that all attachments are referenced correctly.		5/31/2019	
11-	10	Geology and Geotechnical	Please make sure that the geotechnical report specifies slope angles flatter than the critical gradient for the type of slope materials. This is particularly important due to the unstable nature of sand.		5/31/2019	
11-	11	Geology and Geotechnical	On page 35, again reference is being made here to the "Attachment C, Geotechnical Report." Please include this in the reclamation plan for our review and make sure that it accounts for fill being compacted with the Uniform Building Code, local grading ordinance, and/or other methods approved by the County of San Diego.		5/31/2019	
11-	12	Geology and Geotechnical	Please note that review of the Geotechnical Report may result in the generation of additional comments.	Informational	5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
11-	13	Hydrology and Water Quality	The reclamation plan shall include a description of the manner in which stream banks/beds will be rehabilitated to minimize erosion and sedimentation. Page 36 states that "the revegetation practices outlined in Section 3.4 of this Reclamation Plan identify measures... designed to control erosion and sedimentation." Section 3.4 (page 28) states that "revegetation for restoration is provided in the Conceptual Revegetation Plan Attachment B." Please include this in the reclamation plan for our review. Please note that armoring slopes will be required for erosion from 100 year storm events.		5/31/2019	
11-	14	Hydrology and Water Quality	The reclamation plan shall establish site-specific sediment and erosion control criteria for monitoring compliance with the reclamation plan. Page 32 makes reference to the "Conceptual Revegetation Plan" regarding SMARA revegetation performance standards (section 3.8). Again, please include the revegetation plan in the Reclamation Plan for our review.		5/31/2019	
11-	15	Hydrology and Water Quality	Available research regarding revegetation methods and selection of species given the topography, resoiling characteristics, and climate of the mined areas shall be used. Page 30 states that a "discussion of the methods to be used and locations to be planted with specific species are presented in the Revegetation Plan, Attachment B." Again, please include the revegetation plan in the reclamation plan for our review.		5/31/2019	
11-	16	Hydrology and Water Quality	Please provide further discussion on how mining operations will be conducted to substantially prevent siltation of groundwater recharge areas. This should specifically identify all possible ponding and siltation due to sediment deposit out of the standing water column. Also, page 7 mentions an "Attachment B, Hydraulic Analyses." Please include this as part of the reclamation plan for our review.		5/31/2019	
11-	17	Hydrology and Water Quality	Please provide further discussion on the placement/location of the settling ponds and how they will provide a significant benefit to water quality. Also, page 22 makes reference to a Notice of Intent (NOI) and Storm Water Pollution Prevention Plan (SWPPP) being prepared for the State Water Resources Board. Please provide the SWPPP # from the State to be included (referenced) in the reclamation plan.		5/31/2019	
11-	18	Hydrology and Water Quality	On page 22, please expand the statement in the second paragraph regarding BMPs to read "Industrial Best Management Practices (BMPs) and post-extraction BMPs will be designed to protect water quality and in compliance with CCR Section 3706, Section 1600 et seq. of the California Fish and Game Code, the Federal Clean Water Act, the Porter-Cologne Act, the Rivers and Harbors Act of 1899, and RWQCB/SWRCB requirements."		5/31/2019	
11-	19	Hydrology and Water Quality	On page 36, please provide the following statements under section 5.12: "Mine waste and tailings and mine waste disposal units are governed by SWRCB waste disposal regulations and shall be reclaimed in accordance with CCR Article 1. Surface Mining and Reclamation Practice. Section 3500 et seq." and "All waste shall be disposed of in accordance with State and local health and safety ordinances."		5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
11-	20	Sensitive Species and Habitat	On page 34, please add a section discussing the impacts of reclamation on surrounding land uses (much like section 3.14 discusses the effects of reclamation on future recovery of mineral resources).		5/31/2019	
11-	21	Sensitive Species and Habitat	On page 34, please expand 5.3's discussion of impacts to wildlife and habitat. With this, please include a discussion on reasonable wildlife protection measures being implemented by the project. Also, please include the statement "In-stream mining shall not cause fish to be trapped in pools or off-channel pits, or restrict migratory or spawning activities."		5/31/2019	
11-	22	Sensitive Species and Habitat	Sensitive species shall be conserved or mitigated as prescribed by the Federal and California Endangered Species Acts. Further review will be necessary with the submittal of a biological resources report.	Informational	5/31/2019	
11-	23	Sensitive Species and Habitat	Please note that additional comments will likely be generated with the submittal of a biological resources report.	Informational	5/31/2019	
11-	24	Topsoil	On page 13, please add a conclusionary sentence to the first paragraph of section 2.3 that reads "Stored topsoil will not be disturbed until needed for reclamation."		5/31/2019	
11-	25	Topsoil	Please show the location of the proposed topsoil storage (i.e. the "low berms or windrows") on the plans.		5/31/2019	
11-	26	Topsoil	Page 36 states that "it is expected that topsoil will be stripped in advance of the pit." Please be aware that topsoil and vegetation removal should not precede mining by more than a year.		5/31/2019	
11-	27	Revegetation	Available research regarding revegetation methods and selection of species given the topography, resoiling characteristics, and climate of the mined areas shall be used. Page 30 states that a "discussion of the methods to be used and locations to be planted with specific species are presented in the Revegetation Plan, Attchement B." Please include this Revegetation Plan in the Reclamation Plan for our review and make sure that all references to attachments are correct.		5/31/2019	
11-	28	Revegetation	Decomposition methods, such as ripping and disking, shall be used in areas to be revegetated to establish a suitable root zone for planting. Again, please include the "Revegetation Plan, Attachemnt B" to the Reclamation Plan for our review.	Resolved	5/31/2019	5/31/2019
11-	29	Revegetation	On page 31, please add a conclusionary sentence to Section 3.5 that states "If irrigation is used, evidence demonstrating that revegetation has been self-sustaining without irrigation for two years shall be provided prior to the release of finacial assurances."		5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
12-	0	Landscape	Page 1, second paragraph - clarify between open space and pad development, and if the areas being mined within the Sweetwater River channel/floodplain will require mitigation planting as part of the major use permit or as required by the Agencies. If this has been identified, then please provide distinction between the acreages associated with mitigation planting (Revegetation Plan) and acreages associated with slope planting and vegetated storm water basins (Landscape Plan) that would be established as part of the grading plans for the reclamation plan. Coordinate with Sections 4.2 of the Project Description dated March 2018.		11/8/2018 5/31/2019	
12-	1	Landscape	Page 1, sixth paragraph - make revisions to this paragraph based on response to comment 1 above.		11/8/2018 5/31/2019	
12-	2	Landscape	Page 1, seventh paragraph - discuss what will be included within the 50' setback from Willow Glen Dr. Will it included enhanced native vegetation screening?		11/8/2018 5/31/2019	
12-	3	Landscape	Figure 1-1.2 - show location of Hester's Quarry, show outline of Ivanhoe Golf Course and the Lakes Course, and show location of 50' setback along Willow Glen Dr.		11/8/2018 5/31/2019	
12-	4	Landscape	Page 4, fifth paragraph, second sentence - for clarification, planting slopes as part of erosion control would be provided through a Landscape Documentation Package in conjunction with a Grading Plan for the Reclamation Plan. Does the ' <i>planted graded areas become available for revegetation</i> ' mean that these areas will this be monitored and included as part of the Revegetation Plan, or will it be part of a landscape plan and be inspected, not monitored?		11/8/2018 5/31/2019	
12-	5	Landscape	Consider providing definitions of what Reclamation and Revegetation mean as it relates to SMARA and the County can better identify what type of Plan would be required for approval. At this time, it is appearing that a Revegetation Plan would be required for the river channel/floodplain, a Landscape Documentation Package would be required for slope planting and storm water basins, and a seperate Landscape Documentation Package would be required to address project screening and maintenance.		11/8/2018 5/31/2019	
12-	6	Landscape	Page 4 - last paragraph - due to the high visibility of the proposed site from surrounding properties, additional planting of container stock associated with erosion control planting on slopes and screening of the site would be required in addition to erosion control see mix. Please review and make revisions to address long-term screening of the pads from surrounding public roads.		11/8/2018 5/31/2019	
12-	7	Landscape	Consider digging up, boxing, and eventually transplanting existing specimens of trees that could be utilized in the future for screening and maintaining the community character with proposed pad development. This can be discussed in the last paragraph on page 4 and within Vegetation on page 13.		11/8/2018 5/31/2019	
12-	8	Landscape	Page 6 - last paragraph under 2.2 - identify the source of water for the project, including irrigation for berms, screening, slope planting, storm water basins, and mitigation planting.		11/8/2018 5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
12-	9	Landscape	Section , page 7, third paragraph - clarify areas being considered as mitigation planting (Revegetation Plan) and areas being considered Reclamation (Landscape Plan). Please be aware that mitigation monitoring consists of a five year period after County staff have inspected installation of a Revegetation Plan.		11/8/2018 5/31/2019	
12-	10	Landscape	Section 3.4, page 10, third paragraph - this will be addressed during review of a Conceptual Landscape Plan to be submitted during review of the Major Use Permit.		11/8/2018 5/31/2019	
12-	11	Landscape	A Conceptual Landscape Plan will be required during review of the projects' Major Use Permit application. This Plan will help define areas to be addressed as part of Landscape Plan, or a Revegetation Plan. The Plan will also identify maintenance responsibilities.		11/8/2018 5/31/2019	
12-	12	Landscape	In anticipation of the Potential Conveyor Access and Loadout route identified on Figure 3-4.2, please acknowledge within the Project Description that a Revegetation Plan would potentially be required as mitigation for disturbance to native vegetation if this route is accepted.		11/8/2018 5/31/2019	
12-	13	Landscape	Page 13 - show locations and provide dimensions of Operational Setbacks. Identify what plans these would be shown on.		11/8/2018 5/31/2019	
12-	14	Landscape	Page 13 - Vegetation - show locations of mature riparian woodland that wont be disturbed. Identify opportunities for transplanting existing vegetation for future use with screening and maintaining a linkage with the community character.		11/8/2018 5/31/2019	
12-	15	Landscape	Page 13 - Vegetation - show locations and dimensions of existing vegetation to remain along Willow Glen Dr. and identify who will be responsible for maintaining vegetation during the life of the permit, and will maintenance include replacement of dead, dying, or diseased vegetation?		11/8/2018 5/31/2019	
12-	16	Landscape	Page 13 - Topsoil - identify areas suitable for soil salvaging such as areas along the river channel that could be utilized as a native seed bank.		11/8/2018 5/31/2019	
12-	17	Landscape	Page 14, Mine Phase, second paragraph - how tall and wide will the proposed 'earthen berms' be? Reference any Figure's/Maps that show this information, or identify what future plan submittals will provide this information.		11/8/2018 5/31/2019	
12-	18	Landscape	Page 19, second paragraph - if a groundwater study is required of this project, water budget calculations and estimates will be required for all landscape planting associated with screening, erosion control, storm water treatments, and potentially for the revegetation areas.		11/8/2018 5/31/2019	
12-	19	Landscape	Page 20 - the Conceptual Landscape Plan will be required to show the location of all proposed fencing, material type and heights, and screening if determined necessary.		11/8/2018 5/31/2019	
12-	20	Landscape	Section 4.2, last sentence - coordinate Table #'s with those shown on page 23.		11/8/2018 5/31/2019	
12-	21	Landscape	Page 23 - clarify if Table's A and B are supposed to be showing seed mixes for these habitats or if container stock shown is correct.		11/8/2018 5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
12- 22	Landscape	Page 24, first paragraph - provide list of trees and proposed container sizes.		11/8/2018 5/31/2019	
12- 23	Landscape	Section 4.3 - all maintenance and monitoring associated with a revegetation plan (mitigation) shall be a minimum of five years. Please review and make necessary adjustments.		11/8/2018 5/31/2019	
12- 24	Landscape	Section 4.5, first sentence - change Table No. 8 to 7.		11/8/2018 5/31/2019	
12- 25	Landscape	Section 4.5 - provide discussion about weed control in areas adjacent to the project site that would be negatively influenced by invasive species such as earthen berms, operational setback areas, or areas of existing vegetation that will remain as open space or be used for screening.		11/8/2018 5/31/2019	
12- 26	Project Description	Additional comments have been identified on the Project Description dated November 2018. See Comments by David Kahler	New Comments - See Master Project Description	5/31/19	
13- 1	Evidence of Legal Lot	The project site has legal parcels per C/C 90-0204, Parcel F and B/C 92-0038, Parcel A.		11/8/18	N/A
14- 1	Visual Resources	A Visual Resources Study is required. See Attachment D For Scoping Requirements.		11/8/2018 5/31/2019	
15- 1	Agricultural Resources	An Agricultural Analysis is required. See Attachment E Scoping Requirements.		11/8/2018 5/31/2019	
16- 1	Air Quality	An Air Quality Analysis/Report is required. Please Attachment F for Scoping Requirements.		11/8/2018 5/31/2019	
17- 1	Biological Resources	A Biological Resources Report is required. Please see Attachment G For Scoping Requirements.		11/8/2018 5/31/2019	
18- 1	Cultural Resources	A Cultural Resources Report is required. Please see Attachment H For Scoping Requirements.		11/8/2018 5/31/2019	
19- 1	Paleontological Resources	Please see Attachment I for Paleontological Resource Requirements.		11/8/2018 5/31/2019	
20- 1	Geologic Hazards	A Geologic Investigation Report is required. Please see Attachment J For Scoping Requirements.		11/8/2018 5/31/2019	
21- 1	Climate Change/Green House Gas Analysis	A Climate Change/Green House Gas Analysis is required. Please see Attachment P for Scoping Requirements.		11/8/2018 5/31/2019	
22- 1	Flood Analysis	Once a Drainage and Flood Analysis has been submitted. This will be routed to DPW for their review.		11/8/2018 5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
23- 1	Hazards	See Attachment K for Hazardous Materials/Storage Onsite.		11/8/2018 5/31/2019	
24- 1	Fire	<ul style="list-style-type: none"> • A Project Facility Availability—Fire form (PDS #399F) must be completed by the San Miguel FPD. • A Fire Protection Plan shall be submitted for the project (Full- or Letter-Report at the discretion of the San Miguel FPD). • Proposed access roads are to be reviewed and commented on by the San Miguel FPD regarding accessing the site and on-site circulation. • Comments from the San Miguel FPD have not been received regarding this submittal. Please address all of San Miguel FPD's comments prior to resubmittal. 		11/8/2018 5/31/2019	
25- 1	Groundwater Resources	Additional Water Demand Information is required. Please see Attachment M for Scoping Requirements. Staff will forward scoping comments once received.		11/8/2018 5/31/2019	
26- 1	Mineral Resources	A Mineral Resources report is required. Please see Attachment N for Scoping Requirements.		11/8/2018 5/31/2019	
27- 1	Noise	A Noise Study is required. Please see Attachment O for Scoping Requirements.		11/8/2018 5/31/2019	
28- 1	Resource Protection Study	Please provide a Resource Protection Study.		11/8/2018 5/31/2019	
29- 1	Trails	<p>The site has alignment of Community Trails Master Plan (CTMP) trails; Sweetwater Loop and River Trails (Regional Trail) and connections from existing trail easements. The project description also mentions recreational trails as a post mining land use. These trails need further development in coordination with the mining and reclamation plans and proposals. Coordination of the precise alignment between the County and applicant is important to avoid trail easement impacts of on-site project features and sensitive resources such as steep slopes, biology and cultural resources.</p> <p>If any part of a trail corridor, as that term is defined in the CTMP, appendix H, is located on the property under permit, the project shall prepare a trail route study to determine the specific locations of the trail or pathway within the corridor and the type of trail or pathway to be constructed. The route study shall apply the trail design and location criteria and the design and construction guidelines in the CTMP.</p>		11/8/2018 5/31/2019	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
30-	1	Memorandum of Understanding	Please submit Memorandums of Understanding for <ul style="list-style-type: none"> • Agricultural Resources • Air Quality • Archaeological Resources • Biological Resources • Groundwater • EIR Preparer • Fire Protection Planning • Historic Resources • Land Use Planning • Mineral Resources • Noise • Revegetation Planning • Transportation & Traffic • Visual Analysis 		11/8/2018 5/31/2019	
31-	1	Valley Fever Technical Report	Please provide a Valley Fever Technical Report. This will be routed to Health & Human Services Agency for their review.		5/31/19	
32-	1	Environmental Health Services - LEA	The backfilling of mined areas on site as described in the project meets the definition of an Inert Debris Engineered Fill Operation pursuant to 14 CCR § 17388(l).		5/31/19	
32-	2	Environmental Health Services - LEA	Section 2.4 p. 13 states that reclamation and mining will occur concurrently in areas where final contours have been reached. Please ensure the LEA and the Regional Water Quality Control Board (RWQCB) are notified 180 days prior to any backfilling that may occur as part of any of the phases of the project. Prior to backfilling, an EA Notification application must be filed with the LEA along with an operation plan and a copy of the site's Waste Discharge Requirements (WDR) or a letter of exemption from the RWQCB. These filing requirements are outlined in 14 CCR § 17388.3		5/31/19	
33-	1	CALTRANS	Please see attached letter from Caltrans dated December 10, 2018. Please continue coordination with Caltrans.		5/31/19	
34-	1	SDG&E	Please coordinate with SDG&E. There are SDG&E easements and transmission lines on the property.		5/31/19	
35-	1	Sweetwater Authority	Please see attached letter dated December 13, 2018.		5/31/19	
36-	1	Regional Water Quality Control Board (RWQCB)	Please coordinate with the RWQCB. Applicant is encouraged to arrange for a Pre-Application Meeting early in the process.		5/31/19	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
37- 1	Air Pollution Control District (APCD)	Please provide a Health Risk Assessment. This will be routed to APCD for their review. See Attachment F for additional information.		5/31/19	

Land Development Comments

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
0 - 1	Sweetwater River Flood Plain	<p>The subject parcel contains Waters of the US and/or State. Please note it is the applicant/developers responsibility to coordinate with regional agencies to obtain 401/404, Waste Discharge Requirements, CA Fish and Wildlife permits. The applicant should coordinate with the agencies early in the CEQA process as obtaining agency permits could take years. The applicant must put the following note on the extraction/restoration plans:</p> <p>NOTICE: The subject property contains wetlands, a lake, a stream, and/or waters of the U.S. and/or State which may be subject to regulation by State and/or federal agencies, including, but not limited to, the Regional Water Quality Control Board, U.S. Army Corps of Engineers and the California Department of Fish and Wildlife. It is the applicant's responsibility to consult with each agency to determine if a permit, agreement or other approval is required and to obtain all necessary permits, agreements or approvals before commencing any activity which could impact the wetlands, lake, stream, and/or waters of the U.S. on the subject property. The agency contact information is provided below.</p> <p>U.S. Army Corps of Engineers: 915 Wilshire Blvd., Suite 1101, Los Angeles, CA 90017; (213) 452-3333; http://www.usace.army.mil/ Regional Water Quality Control Board: 2375 Northside Drive, Suite 100, San Diego, CA 92108; RB9_DredgeFill@waterboards.ca.gov ; http://www.waterboards.ca.gov/sandiego/ California Department of Fish and Wildlife: 3883 Ruffin Rd., San Diego, CA 92123; (858) 636-3160; AskR5@wildlife.ca.gov http://www.dfg.ca.gov/</p>		5/31/19	
1 - 1	General - Fire	Have your project reviewed and commented on by the San Miguel Fire Protection District . Projects conditions may be revised upon input from outside agencies.	See Comment 9-4	5/31/19	
1 - 2	General - Utilities	Have your project reviewed and commented on by the Otay Water District - and the Spring Valley Sanitation District . Projects conditions may be revised upon input from outside agencies.	See Comment 9-6 and 9-7.	5/31/19	
1 - 3	General - Grading Permit	There is an open grading permit L-14806 that is pending resolution of the CLOMR/LOMR hydraulic analysis to the satisfaction of DPW Flood Control and FEMA. The grading permit will need to be record planned prior to approval of the MUP.		5/31/19	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
1a- 1	Project Description	Storm Water and Erosion Control: Please discuss the projects need for coverage under the Industrial General Permit Order 2014-0057-DWQ Effective July 1, 2015. The project proponent will be required to file a Notice of Intent (NOI) and develop a Storm Water Pollution Prevention Plan (SWPPP) prior to issuance of the Reclamation Plan grading permit.		5/31/19	
1a- 2	Project Description	6.0 Required Approvals, Permits and Review: Please include the State Water Resources Control Board (SWRCB) and Regional Water Quality Control Board (RWQCB) Industrial General Permit Order 2014-0057-DWQ Effective July 1, 2015.		5/31/19	
1b- 1	Reclamation Plan - Report	Reclamation Plan Index Chart is inconsistent with the Table of Contents (page numbers do not match) Please revise		5/31/19	
1b- 2	Reclamation Plan - Report	p. 7 refers to Attachment B, Hydraulic Analyses for the Cottonwood Sand Mine. Please provide the Hydraulic Analyses. Also this Attachment B reference is inconsistent with the Table of Contents.		5/31/19	
1b- 3	Reclamation Plan - Report	p. 15: Second paragraph discusses a two lane onsite access road. Please identify the road base materials of the proposed road (ie disintegrated granite?) Please identify the graded width, improvement width and easement width for the proposed access roads.		5/31/19	
1b- 4	Reclamation Plan - Report	Figure 2.5-1 Cottonwood Sand Mine Process Plant Area: Please show Willow Glen Drive, a landmark or provide a vicinity map to show where the Process Plant Area is located relative to the rest of the project.		5/31/19	
1b- 5	Reclamation Plan - Report	p. 21: Truck Trips and Other Vehicle Trips: 175 Truck Trips + 28 Light Vehicle Trips + 8 Vendor Trips = 212 Average Daily Trips (ADTs). Projects with >200 ADTs require a Traffic Impact Analysis.		5/31/19	
1b- 6	Reclamation Plan - Report	Note Haul Route Plans, Traffic Control Permits and ROW Encroachment Permits will be required at the time of mining operations prior to approval of the Reclamation Plan. <u>Please list all permits in Section 6.0 of the Project Description.</u>		5/31/19	
1b- 7	Reclamation Plan - Report	p. 22: 2.8 Storm Water and Erosion Control: Please refer to Required Approvals, Permits and Review: Please include the Industrial General Permit Order 2014-0057-DWQ Effective July 1, 2015	See Comment 1a-1	5/31/19	5/31/2019
1b- 8	Reclamation Plan - Report	p. 24: 2.9.3 Fire and Law Enforcement Services: Please revise "In addition, the San Diego are headquarters..." to "...San Diego area headquarters..."		5/31/19	
1b- 9	Reclamation Plan - Report	p. 24: 2.9.3 Fire and Law Enforcement Services: Please identify the distance of the San Diego County Sherri's Dept. to the project site.		5/31/19	
1b- 10	Reclamation Plan - Report	p. 24: 2.9.4: Equipment Fuel: Please revise: "...and will be stored in compliance with all regulations..." to include "...in compliance with the CA Aboveground Petroleum Storage Act (APSA) and all County, State and Federal regulations."		5/31/19	
1b- 11	Reclamation Plan - Report	p. 25: 3.0 Reclamation and Revegetation: Third paragraph please revise: "...the entire site will be and revegetated and reclaimed..." to "...the entire site will be revegetated and reclaimed..."		5/31/19	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
1b- 12	Reclamation Plan - Report	p. 33: Proposed access gates shall be approved by the San Miguel Fire Protection District	Project will be conditioned accordingly	5/31/19	
1b- 13	Reclamation Plan - Report	p. 35 refers to Attach. C Geotechnical Report not provided. Please provide.		5/31/19	
1b- 14	Reclamation Plan - Report	p. 35: Section 5.6: Please refer to the Industrial General Permit Order 2014-0057-DWQ Effective July 1, 2015 requirements to file NOI, prepare SWPPP and implement BMPs to mitigate erosion and sediment transport.	Informational	5/31/19	5/31/2019
1b- 15	Reclamation Plan - Report	p. 35: Section 5.10: Please refer to the County of San Diego Watershed Protection Ordinance (WPO) No.10410		5/31/19	
2 - 1	Reclamation Plan	Show location of any proposed Site Design BMP features, post-construction BMPs, drainage devices, stormwater protection facilities, walls, cribbing, dams, or other protective devices to be constructed in connection with the proposed work. The Industrial General Permit requires that a condition of approval.		5/31/19	
2 - 2	Reclamation Plan	Provide clear phasing plans. Identify quantities of materials excavated for each phase.		5/31/19	
2 - 3	Reclamation Plan	Please provide drainage terraces for all the cut and fill slopes that exceeding forty feet (40') in vertical height to comply with section 87.402 of the Grading Ordinance, and SD County Design Standard Drawing DS-10. Alternatively, a geotechnical engineer can provide a recommendation for the slopes.		5/31/19	
2 - 4	Reclamation Plan	Clearly show existing and proposed Haul Routes or location of material conveyor system for each phase of the development. Provide cross sections for existing and proposed roads, if applicable. Show improvement limits, structural section and easement limits, cross slope.		5/31/19	
2 - 5	Reclamation Plan	Clearly show the ROW limits along Willow Glen Drive (SF 1397) . Note Willow Glen Drive (SF 1397) is designated as a 2.1D Community Collector with a Class II Bike Lane from Hillsdale Road to Camino de las Piedras under the General Plan Mobility Element Network. Show ROW dimensions, pavement width, centerline, curb gutter sidewalks.		5/31/19	
2 - 6	Reclamation Plan	Clearly label and show the ROW limits along Steele Canyon Road (SC 2050) . Note Steele Canyon Road (SC 2050) is designated as a 4.1B Major Road with intermittent turn lanes and Class II Bike Lane from Willow Glen Drive to Jamul/Dulzura Regional Boundary under the General Plan Mobility Element Network. Show ROW dimensions, pavement width, centerline, curb gutter sidewalks.		5/31/19	
2 - 7	Reclamation Plan	Clearly show the existing and proposed Flood Plain and Floodway limits. Note project proposes impacts to mapped FEMA and DPW Floodways/Floodplains and requires review and approval by the DPW Flood Plain Administrator. Include symbols in the Legend		5/31/19	
2 - 8	Reclamation Plan	Sheet 1 of reduced plan set in Rec Plan: Legend mislabeled as "Project Phasing". Provide Project Phasing Plan on sheet 1. Please clearly identify all linework in the Legend on Sheet 1.		5/31/19	
2 - 9	Reclamation Plan	Provide conversion factor for CY to Finished Tons.		5/31/19	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
2 - 10	Reclamation Plan	Reduced plan set in the Rec Plan: Show dimensions for proposed access points. Provide cross sections. Show easement width, graded width, pavement width, structural section and percent cross slope.		5/31/19	
2 - 11	Reclamation Plan	Show all temporary and permanent internal roads.		5/31/19	
2 - 12	Reclamation Plan	Label batch plant on the plot plan.		5/31/19	
2 - 13	Reclamation Plan	Show all temporary and permanent fencing and security gates for the operation. How will access be granted for emergency vehicles and fire protection personnel?		5/31/19	
3 - 1	CEQA Drainage Study	Provide a CEQA Preliminary Drainage Study for review.		5/31/19	
3 - 2	CEQA Drainage Study	In the narrative of the report please provide a summary table of: pre- and post- development H, L, C, Tc, I, A, and Q for each area (or point) where drainage discharges from the project. Peak runoff rates (cfs), velocities (fps) and identification of all erosive velocities (at all points of discharge) calculations for pre-development and post-		5/31/19	
3 - 3	CEQA Drainage Study	Conclusion: Please include the follow discussion Discuss whether or not the proposed project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? Provide reasons and mitigations proposed.		5/31/19	
3 - 4	CEQA Drainage Study	Discuss whether or not the proposed project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? Provide reasons and mitigations proposed.		5/31/19	
3 - 5	CEQA Drainage Study	Discuss whether or not the proposed project would create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems? Provide reasons and mitigations proposed.		5/31/19	
3 - 6	CEQA Drainage Study	Discuss whether or not the proposed project would place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps? Provide reasons and mitigations proposed.		5/31/19	
3 - 7	CEQA Drainage Study	Flood Control- Analysis is required to analyze the pre- and post-conditions of each of the phases of mining, and to demonstrate that there would not be a rise due to work in the floodway at any time during the project.		5/31/19	
3 - 8	CEQA Drainage Study	Flood Control - A Conditional Letter of Map Revision (CLOMR) would be required prior to excavating the site and a Letter of Map Revision (LOMR) would be required prior to final sign-off of site reclamation.		5/31/19	
3 - 9	CEQA Drainage Study	Flood Control- Please contact Anthony Barry (858-694-2707) in Flood Control if you have any questions regarding the scope of analysis regarding calculations necessary for the floodway.		5/31/19	
3 - 10	CEQA Drainage Study	The CEQA Drainage Study needs to be signed and stamped by the Engineer of Record including the Declaration of Responsible Charge.		5/31/19	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4 - 1	Sight Distance	Please provide information that intersectional sight distance per County Public Road Standards 6.1.E can be met for each of the proposed access points along: Willow Glen Drive (SF 1397) The sight distance required will be based on the greater of the two speeds (85th percentile or design speed). Additional project conditions may be added depending on the information provided.		5/31/19	
4 - 2	Sight Distance	Provide an exhibit to show the available sight distance.		5/31/19	
4 - 3	Sight Distance	The sight distance should be based on the design speed of the road or 85th percentile speed, whichever is higher. Provide documentation for speed used.		5/31/19	
5 - 1	Traffic Impact Study	A Traffic Impact Study is required if the project proposes more than 200 Average Daily Trips (ADTs) on a 2 lane road. Currently the project proposes: 176 Truck Trips + 28 Light Vehicle Trips + 8 Vender Trips = 212 ADTs. Traffic consultant should coordinate with PDS staff to develop the Traffic Study scope of work. Report should follow the County of San Diego Guidelines for Determining Significance and Report Format Content Requirements, available at the following link: http://www.sdcountry.ca.gov/dplu/docs/Traffic_Guidelines.pdf		5/31/19	
6 - 1	Storm Water Management	The project is subject to the Watershed Protection Ordinance (WPO) and will require compliance because it is a requirement to have BMPs through the Industrial General Permit ORDER 2014-0057-DWQ - EFFECTIVE JULY 1, 2015. The County will inspect the project for compliance under the Industrial Permit as required by the WPO. Projects such as this one are covered under the Statewide Industrial Storm Water Permit. A requirement under that permit is for the project to have a Storm Water Pollution Prevention Plan (SWPPP) for its activities including any expansion of the operation. A copy of the Industrial SWPPP or a copy of the Notice of Intent to prepare a SWPPP should be included with the Reclamation Plan. Please provide this with your revised Reclamation Plan document.		5/31/19	
6 - 2	Storm Water Management	Note certain phases of this project may be subject to the Construction General Permit Order 2009-0009-DWQ and require a Notice of Intent and Construction SWPPP. A copy of the Construction SWPPP or a copy of the Notice of Intent to prepare a SWPPP should be included with the Reclamation Plan. Please provide this with your revised Reclamation Plan document.		5/31/19	
7 - 1	Flood Control	Provide Hydraulic Analysis HEC-RAS for the proposed reclamation areas within the mapped FEMA and DPW floodway/floodplains		5/31/19	
7 - 2	Flood Control	Note there is an open grading permit L-14806 that will need to be closed prior to approval of the MUP for the reclamation plan.		5/31/19	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
8 - 1	Sweetwater Authority: Water Transfers	The Authority has senior water rights along the Sweetwater River. These water rights were acquired by the Authority through its predecessors. Among other things, these water rights allow the Authority to transfer water from Loveland Reservoir to Sweetwater Reservoir along the Sweetwater River channel. The Project might impact the Authority's ability for any runoff to travel downstream along the river to Sweetwater Reservoir. The Project Description does not acknowledge the water transfers anywhere. Similarly, it does not propose any type of coordination or agreement with the Authority. The Authority would like to know, in writing, what the intentions of the Project Proponent are in regards to the currently periodic water transfers.		5/31/19	
8 - 2	Sweetwater Authority: Water Transfers	The Project proposes to widen the riverbed to a width of approximately 250 - 300 feet while maintaining the existing channel elevations. A wider riverbed would likely slow down the flow of water being transferred from Loveland Reservoir to Sweetwater Reservoir, and the increased surface area in the riverbed would likely allow for more water losses, adversely affecting the Authority and its customers. The Authority would like to request different alternatives to the final design of the Sweetwater River channel at the Project location.		5/31/19	
8 - 3	Sweetwater Authority: Water Transfers	Restoring streambeds and riverbeds is an expensive and challenging task. Before Project approval, the Authority requests that a restoration plan is developed and financial securities are in place to ensure that full restoration of the site occurs. Any on-site revegetation should not be dependent on runoff stored at Loveland Reservoir or water being transferred.		5/31/19	
8 - 4	Sweetwater Authority: Water Transfers	The Project proposes a conveyor belt to transport excavated soils to a processing plant on site. Sections of the conveyor belt are proposed to be within the Sweetwater River. It is not explained if sections of the conveyor belt will be moved temporarily when the river is flowing or when the Authority transfers water.		5/31/19	
8 - 5	Sweetwater Authority: Water Transfers	The Project proposes to use water from existing on-site groundwater wells and then abandon those wells after Project completion. The Authority currently uses one of those wells for monitoring groundwater levels and it is in the Authority's interest to keep that monitoring well operational.		5/31/19	
8 - 6	Sweetwater Authority: Water Transfers	Water transfers should be considered a factor in any Drainage Analysis or other hydrology studies.		5/31/19	
8 - 7	Sweetwater Authority: Potential for Pollution	The California Drinking Water Source Assessment and Protection (DWSAP) Program classifies mining operations as a very high risk possible contaminating activity (PCA). Very high PCAs have the highest potential for contaminating drinking water sources, such as Sweetwater Reservoir. In order to complete a vulnerability analysis, the Authority requests the following information:	Informational	5/31/19	5/31/2019

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE

PDS2018-MUP-18-023, PDS2018-RP-18-001

Planning & Development Services Planning and CEQA Comments

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
8 - 8	Sweetwater Authority: Potential for Pollution	A list of substances and materials ("pollutants of concerns") that are proposed to be used as part of the Project that have the potential to pollute soils, waterways, groundwater, and the Sweetwater Reservoir. Impacts from pollutants of concern should also be analyzed as part of the Project's environmental review. Furthermore, the Authority requests that a pollutant load analysis be conducted as part of the environmental review process to better understand the potential impacts to water quality.		5/31/19	
8 - 9	Sweetwater Authority: Potential for Pollution	A PDF copy of the Plot Plan; Conceptual Landscape Plan; Resource Protection Study; Reclamation Plan; Full Biological Resources Report/Study; Conceptual Resource Management Plan; Additional Hazards Information; Drainage/Flooding Analysis; additional Detailed Water Demand; geologic/Geotechnical Report; and Stormwater Management Plan.		5/31/19	
8 - 10	Sweetwater Authority: Potential for Pollution	The Authority understands that compliance with existing water pollution control regulations will be required for the Project in the form of implementation of a Stormwater Management Plan (SWMP) or similar compliance documentation. Reviewers of the draft SWMP should consider the following information:	Informational	5/31/19	5/31/2019
8 - 11	Sweetwater Authority: Potential for Pollution	A terminal drinking water reservoir that serves a population of approximately 200,000 people is located less than three miles downstream of the Project.		5/31/19	
8 - 12	Sweetwater Authority: Potential for Pollution	While implementation of erosion and sediment control measures may help mitigate, to an extent, impacts to the Sweetwater River and the downstream reservoir, mismanagement of the mine, lack of BMP maintenance, or "an act of God" could result in significant pollution and siltation of Sweetwater Reservoir.		5/31/19	
8 - 13	Sweetwater Authority: Potential for Pollution	Water transfers from Loveland Reservoir to Sweetwater Reservoir may be an event that can be coordinated between the Authority and the Project Proponent. Other events, such as atmospheric rivers or Loveland Reservoir "spills," cannot be controlled and may result in significant river flows that could flood the proposed mining site and result in pollution and siltation of Sweetwater Reservoir.		5/31/19	
8 - 14	Sweetwater Authority: Potential for Pollution	The Project includes habitat restoration in mined sites within the floodplain. Major erosion of recently restored sites located within the floodplain may occur during water transfers or significant storm events. It would be appropriate to know what solution the Project Proponent is suggesting to prevent this from happening, and if the suggested solution is feasible.		5/31/19	
8 - 15	Sweetwater Authority: Potential for Pollution	The Project Description mentions that areas disturbed by the mining operations will be progressively reclaimed two years after the start of mining. Reclamation will consist of grading and revegetation. The Project Description, however, does not describe what type of erosion and sediment control measures will be implemented in disturbed areas during the two-year gap before reclamation begins.		5/31/19	
8 - 16	Sweetwater Authority: Potential for Pollution	The Project proposes import of inert fill and wash fines ("fill") to be used as backfill in areas parallel to the river channel. Fill could be washed away by river flows and result in siltation of Sweetwater reservoir and impacts to water quality. Contaminated wash fines should not be reused or disposed of on site.	Informational	5/31/19	5/31/2019

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE			PDS2018-MUP-18-023, PDS2018-RP-18-001		
Planning & Development Services Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
8 - 17	Sweetwater Authority: Potential for Pollution	The Project includes many features with potential for contaminating the river and the Sweetwater Reservoir. These features include muck ponds, the conveyor belt, and settling ponds. BMPs that prevent contamination of both groundwater and surface waters should be implemented at all times.	Informational	5/31/19	5/31/2019
8 - 18	Sweetwater Authority: Potential for Pollution	Spillage from the conveyor belt could result in impacts to water quality and become a safety hazard as the conveyor belt shares the area under the Steele Canyon Rd. Bridge with the main river channel. A safer, better alternative should be analyzed; full avoidance of the area under the bridge is preferred.	Informational	5/31/19	5/31/2019
8 - 19	Sweetwater Authority: Potential for Pollution	Any negative impacts to water quality resulting from this Project can result in the need for additional water treatment. Additional treatment could result in additional cost to the Authority and its customers.	Informational	5/31/19	5/31/2019
8 - 20	Sweetwater Authority: Fee Collection	If this Project moves forward, the Authority requires that a condition be placed on the Project to require the owner to submit satisfactory evidence to the County stating that the owner has complied with Resolution 84-8 As Amended. The timing for condition compliance is prior to issuance of any building permit or other permit pursuant to a Major Use Permit. On May 8, 1985, the County Board of Supervisors took action to require the County to place conditions on development proposals within a designated area of the Sweetwater River Watershed to the satisfaction of the Authority, as provided in Resolution 84-8. Since the Board of Supervisors action, discretionary Project approvals within the designated watershed area have complied with this condition. The resolution provides for the collection of urban runoff protection fees from all developments within the lower Sweetwater Reservoir drainage basin to pay for a portion of the URDS.	Informational	5/31/19	5/31/2019
8 - 21	Sweetwater Authority: Future Site Development	After sand mining operations are concluded, the Project proposes to establish pads for future residential development. It is recommended that alternative land uses for the site be considered, as housing in the river's vicinity may be hazardous and subject to flooding.	Informational	5/31/19	5/31/2019
8 - 22	Sweetwater Authority: Distribution List	The Authority recommends the following public agencies be included in the distribution list as these other agencies may have concerns with this Project aswell. <ul style="list-style-type: none">• 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, Water Quality Programs• U.S. Bureau of Reclamation, Southern California Area Office• San Diego County Water Authority, Water Resources Department	Informational	5/31/19	5/31/2019

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE			PDS2018-MUP-18-023, PDS2018-RP-18-001			
Planning & Development Services Planning and CEQA Comments						
Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
Department of Parks & Recreation Comments						
Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
1- 1		Trails	The County of San Diego, Department of Parks and Recreation (DPR), owns several recreational facilities within one-half mile of the Cottonwood Sand Mining project site, which include Steele Canyon, Hilton Head, Cottonwood, Woodhaven, and Hillsdale County Parks. Additionally, the Sweetwater Loop and River Regional Trail is planned along Willow Glenn Drive from Jamacha Boulevard to Hillsdale Road and transitions into the Sycuan/Slone Canyon Trail project, currently in early phases of implementation, which will connect users to the California Riding and Hiking Regional Trail. Further, there are planned community trails, identified in the CTMP, that surround the project site, as well as existing trail easements in the subdivisions south of the project which support connections to the local and regional recreational network for local residents. Given the proximity of the project to these recreational assets, establishing trails and pathways as part of the project is critical in creating and completing connections in the Valle De Oro and surrounding communities. The County requests the applicant prepare a Trail Route Study as a first step in the trail conditioning process. Information suggested as part of the Trail Route Study can be found in the CTMP, Section 6 Trail Planning Considerations and on the PDS website, as part of the Process Guide, https://www.sandiegocounty.gov/content/sdc/pds/procguid.html .		5/31/19	
1- 2		Trails	Improved trails and possibly pathways and associated easements granted to the County of San Diego will be required as part of this project.		5/31/19	
Department of Environmental Health Comments						
Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
1- 1		DEH	The Department of Environmental Health has reviewed the Major Use Permit for the proposed development of a sand and aggregate extraction operation on the ~280 acres. The project was submitted to PDS on 11/19/18. Potable water is proposed to be provided by bottled water for employees of the operation. Wastewater generated by the facility is proposed to be collected in portable restrooms and trucked offsite for the duration of the project (12 years). The applicant has shown the eight existing wells on the property and has indicated that the wells will be retained and used to provide non-potable water for the mining and processing operations.		5/31/19	
2- 1		DEH	Any septic tanks no longer in use on the property are to have all contents pumped clean by a permitted waste hauler. The tanks are then to be removed or backfilled with sand, gravel, cement, or native soil.		5/31/19	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

COTTONWOOD SAND MINE				PDS2018-MUP-18-023, PDS2018-RP-18-001		
Planning & Development Services Planning and CEQA Comments						
Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
3-	1	DEH	Should any wells on the property require destruction as a result of mining activities or if a well is no longer in use, they shall be destroyed by a C-57 contractor, under permit and inspection by DEH.		5/31/19	

ATTACHMENT B
ESTIMATE OF DISCRETIONARY PROCESSING TIME AND COSTS

The attached estimate of discretionary processing time and costs is an estimate of the deposits required to process the application through hearing/decision. Several assumptions were required to supply the cost estimate and schedule at this time in the process. If the assumptions listed on the bottom of the attached estimate prove to be incorrect, your cost estimate will be adjusted. Deposits will be requested in installments as funds are needed to continue processing. Be aware that Section 362 of Article XX of the San Diego County Administrative Code, Schedule B, 5 states that:

The Director of Planning & Development Services may discontinue permit processing and/or recommend denial of the said project based on non-payment of the estimated deposit.

The initial review of your project indicates that there will be an effect on native biological resources. Therefore, State law requires the payment of a fee to the California Department of Fish and Wildlife for their review of the project environmental document (Fish and Wildlife Code §711.4). If this fee is needed, it will be requested at a later time during the process. Payment of the fee is required regardless of whether or not we consider the effect on native biological resources to be significant or clearly mitigated. The Project Manager will remind you to pay this fee immediately prior to public review of the project environmental document.

Should your application be approved, there will be additional processing costs in the future (e.g., Final Map processing costs, park fees, drainage fees, building permit fees). The above estimate includes only the costs to get your present application(s) to hearing/decision and does not include these additional processing costs.

ESTIMATE OF DISCRETIONARY PROCESSING TIME AND COSTS

Project Name: COTTONWOOD SAND MINING PROJECT
 Project Number: PDS2018-MUP-18-023
 Staff Completing Schedule: HEATHER STEVEN
 Decision-Making Body: Planning Commission and Board of Supervisors
 Date Schedule Produced/Revised: 5/31/2019

TASK/ACTIVITY	Estimated Duration (Days)	Estimated Completion Date	Actual Completion Date
APPLICATION SUBMITTAL			11/19/2018
DETERMINATION THAT AN EIR IS REQUIRED			11/19/2018
PDS reviews project application "completeness", completes planning and environmental scoping	30	12/19/2018	5/31/2019
PDS meets with applicant to discuss need for EIR, scope and schedule	14	6/14/2019	
Applicant submits documents for Public Review of Notice of Preparation (NOP)	7	6/21/2019	
PDS completes advertises and distributes NOP	10	7/1/2019	
Public review of NOP	30	7/31/2019	
PDS receives and distributes public comments on NOP to Applicant (180 period for resubmittal of DEIR begins here)	3	8/5/2019	
PDS meets with applicant to discuss EIR scope, cost estimate and schedule	10	8/15/2019	
Applicant submits 1st Draft EIR and Planning Documentation	120	12/3/2019	
PDS reviews 1st Draft EIR	45	1/17/2020	
Meeting with applicant	7	1/24/2020	
Applicant submits 2nd Draft EIR and Planning Documentation*	45	3/2/2020	
PDS reviews 2nd Draft EIR*	30	4/1/2020	
Meeting with applicant	7	4/8/2020	
Applicant submits 3rd Draft EIR and Planning Documentation*	30	5/1/2020	
PDS reviews 3rd Draft EIR*	30	6/1/2020	
Meeting with applicant	7	6/8/2020	
Applicant produces copies of documents, submits DEIR and copies of documents	10	6/11/2020	
PDS completes distribution paperwork, advertises and distributes Draft EIR	14	6/25/2020	
Public Review of Draft EIR	45	8/10/2020	
PDS transmits Public Comments to Applicant	3	8/13/2020	
PDS holds meeting with applicant to discuss approach to address public comments, discuss project schedule	10	8/20/2020	
Applicant submits 1st Draft Responses to Public Comment (RTC) and EIR Errata	30	9/21/2020	
PDS reviews 1st Draft Responses to Public Comments and EIR Errata	25	10/16/2020	
Applicant submits 2nd Draft RTC and EIR Errata*	21	11/6/2020	
PDS reviews 2nd draft RTC & EIR Errata, meets with applicant / consultant to finalize responses for I-119 review*	20	11/26/2020	
Applicant submits Draft RTC & EIR Errata for I-119 review & 1st draft EIR Findings for staff review	5	12/1/2020	
Board Policy I-119 Review of Responses to Comments and DEIR	40	1/11/2021	
PDS reviews I-119 comments, meets with Counsel, transmit comments to applicant, set meeting with applicant	7	1/18/2021	
Applicant submits revised RTC, EIR Errata, and EIR Findings, meets with PDS to review changes	14	2/1/2021	
PDS reviews RTC, EIR Errata & Findings and sends to Counsel for review OR meet with Counsel if 2nd I-119 review not necessary	14	2/15/2021	
Second Board Policy I-119 Review of RTC, EIR Errata and Findings*	30	3/3/2021	
PDS Finalize RTC, EIR Errata, and Findings. Meeting with applicant / consultant*	10	3/15/2021	
Applicant makes final revisions, produces copies of FEIR, CEQA Findings and RTCs and pays Fish and Wildlife Fees	7	3/22/2021	
PDS attends Director briefing to make project recommendation	7	3/29/2021	
PDS finalizes project resolution/decision, completes findings, conditions, draft staff report and begins preparation of Board Letter	30	4/14/2021	
PDS management and County Counsel review staff report, obtain concurrences from other Departments	14	4/28/2021	
PDS finalizes legal advertisement for hearing, newspaper advertises Planning Commission Hearing	10	5/10/2021	
Planning Commission Hearing	14	5/24/2021	
Appeal period	10	6/3/2021	
PDS Finalizes draft Board Letter, include Planning Commission Recommendation	21	6/24/2021	
PDS management and County Counsel review Board Letter, obtain concurrences from other Departments	10	7/5/2021	
PDS finalizes legal advertisement for hearing, Board Hearing advertised in newspaper	7	7/12/2021	
Board of Supervisors Hearing (if appealed)	18	7/30/2021	

PROJECT SCHEDULE ASSUMPTIONS

Project description remains consistent throughout process
 Applicant will submit information in accordance with schedule
 All issues will be resolved concurrently.
 Bolded tasks are under the control of applicant/consultant.
 * Task can be eliminated if earlier draft documents are adequate.
 Hearing date is subject to decision making body availability and schedule
 The project will not be continued by decision maker or appealed
 Assumes public review comments are not exceptionally numerous or complex
 Assumes deposit account balance remains positive. County work may not proceed without adequate funds.
 Dates which fall on a holiday have an actual completion date the first business day after such holiday.
 Schedule does not include negotiations with the Wildlife Agencies. An amendment would also involve Federal Register Notice and an environmental document that addresses both state and federal environmental requirements (CEQA and NEPA) as well as Wildlife Agency concurrence. Please also note that these permit processes can take years to complete and could result in significant delays in the processing of the project.

COST ESTIMATE ASSUMPTIONS

Estimate is based on relative cost of projects of similar complexity
 Estimate does not include applicant's consultant/engineering costs
 Does not include County costs for post discretionary review (e.g. final map)
 Costs assume project schedule assumptions are maintained
 Costs will be paid at installments throughout the process
 If project is over budget, cost estimate will be revised
 The State of CA adjusts Fish and Wildlife Fees annually for inflation
 Project will be processed with an Environmental Impact Report
 Cost estimate does not include additional deposits for Trails Review or DEH that may be required

COST ESTIMATE SUMMARY

Total Discretionary Cost Estimate	\$950,550
Deposits Paid to Date	\$74,519
Account Balance	\$17,493
Estimated County Costs Remaining	\$876,031
Fish & Wildlife Fees/ County Clerk Fee	\$3,128
% Expended of Total Cost Estimate	6.00%

ATTACHMENT C
MEMORANDUMS OF UNDERSTANDING

CONSULTANT LIST & MEMORANDUM OF UNDERSTANDING (MOU)

The County of San Diego's CEQA guidelines require that environmental technical studies be prepared by a consultant from the County's CEQA Consultant List, which can be found on the County of San Diego's website at: <http://www.co.san-diego.ca.us/PDS/procguid.html> (item number 4 under "General Guidance"). No list is maintained for hydrology and stormwater management planning. With the exception of minor stormwater management plans, only registered engineers registered in the State of California shall be permitted to submit hydrology/drainage studies and only registered engineers or Certified Professionals in Storm Water Quality certified by CPESC, Inc., or an equivalent entity approved by the Director of Public Works, shall be permitted to submit stormwater management plans.

Applicants are responsible for selecting and direct contracting with specific consultants from the County's list to prepare CEQA documents for private projects. Prior to the first submittal of a CEQA document prepared by a listed consultant for a private project, the applicant, consultant, consultant's firm (if applicable) and County shall execute the attached Memorandum(s) of Understanding (MOU). The responsibilities of all parties involved in the preparation of environmental documents for the County (i.e. applicant, individual CEQA consultants/sub-consultants, consulting/sub-consultant firms, and County) are clearly established in the MOU for each requested applicable study. The clear identification of roles and responsibilities for all parties is intended to contribute to improved environmental document quality. The MOU can be found at: <http://www.sdcounty.ca.gov/luegdocs/Templates/Boilerplate%20Templates/MOU.doc>.

Copies must be made and signed by the applicant, consultant and firm (if applicable) for each of the following requested subject area technical studies:

- Agricultural Resources
- Air Quality
- Archaeological Resources
- Biological Resources
- Groundwater
- EIR Preparer
- Fire Protection Plan
- Mineral Resources
- Noise
- Revegetation Planning
- Transportation & Traffic
- Visual Analysis

ATTACHMENT D
PLANNING ANALYSIS

PROJECT DESCRIPTION

Below is the project description that staff has generated from the information provided in the application package. Please review this project description and verify with staff that the project description is correct:

The applicant is requesting a, Major Use Permit, Reclamation Plan and a Certificate of Compliance for Sand Mining project suitable for Portland Cement Concrete (PCC) use. The project would convert the existing golf course to a sand mining operation over ten years in three phases. The proposed project would produce 3.8 million cubic yards (5.7-million tons) of mineral resources and would have a maximum production limit of 570,000-tons (380,000 cubic yards) of construction grade aggregate per calendar year. Excavated material will total 4.7-million cubic yards with approximately 3.8-million cubic yards (5.7-million tons) of construction aggregate produced. As mining is completed in phases, the site will be progressively reclaimed and restored. The combined mineral extraction and reclamation project will affect approximately 244 acres of 280 acres in the Jamacha Valley.

The project will be developed in three mining phases and a fourth phase for final reclamation and will proceed in a southwest to northeast direction. The first phase will involve installation of access roads, creation of a pad for a processing plant east of Steele Canyon Road, placement of a conveyor/slurry line running west to east and development of the initial extraction area. As phases proceed the conveyor/slurry line will be moved to serve the areas mined in later phases. A final phase, Phase 4, will be a final reclamation, clean up and equipment removal phase. Facilities proposed for use at the site will include: a processing plant, a storage container, weigh scales and a modular scale house. The golf course will be operational as mining is completed in three phases. At the beginning of Phase 2, the front nine holes will be closed as mining begins and the back nine holes will continue to operate until the final phase of mining begins. After mining operations reclamation of the site will be conducted.

Site access for the project will require modification of the existing driveways and parking lot located on Willow Glen Drive next to the existing golf clubhouse. A new access point to the property from Willow Glen Drive west of the Steele Canyon Road (Phase 1 area) will be necessary as the clearance height of the bridge that crosses the Sweetwater River on Steele Canyon Road will not allow most large trucks or heavy equipment to pass beneath the bridge.

The project site is located off Willow Glen Drive in the Valle De Oro Community Planning area, within unincorporated San Diego County. The site is subject to the General Plan Semi-Rural Regional Category, and Specific Plan Area Land Use Designation, and zoned Holding Area (S90), Open Space (S80), and Specific Plan (S88).

SCOPE FOR LAND USE/COMMUNITY CHARACTER ANALYSIS

General Information: A land use/community character analysis shall be prepared for the proposal. This analysis shall include a map of the surrounding land uses that exist in the area. The analysis shall provide the following information:

1. The visual impact evaluating the compatibility of the scale and mass of the proposed project with the surrounding area.
 - This evaluation shall include information which compares square footage, heights, lot sizes, required earthwork and occupancy rates of other uses in the vicinity of the proposed project.
 - The architectural style of the structures and their site utilization shall be related to the manner in which surrounding properties have developed.
 - Landscaping shall be discussed in light of the ability of the plantings to soften the exterior appearance and relative massiveness of the proposed structures.
2. Other physical impacts resulting from the nature of the operations
 - This evaluation shall include the type of activities to be conducted, the time of day during which the various operations will occur, the days of the week the facility will be used, and the number of peoples involved.
 - This information shall define any potential impacts associated with this intensification of use of the site as well as providing a baseline for the analysis of noise, traffic, lighting or other related impacts.
3. The potential for subsequent changes to the regional environmental setting resulting from similar additional requests encouraged by the now altered community character or what physical limitations would not permit other property owners from following suit.

Refer to the Project Issue Checklist for required changes to the Plot Plan.

ATTACHMENT E
SCOPE FOR VISUAL RESOURCES & AESTHETICS

Planning & Development Services has completed review of your project application and has determined that the project may adversely affect visual resources. Visual resources can include narrow or expansive views, can be views from one site or from a series of sites (as along a scenic highway), and can be viewed from above, at eye level, or from below. A particular thing that defines a community or a region's character and identity is also a scenic resource.

The aesthetic value of visual resources is not limited to open space and rural lands, but can also be held in historic structures and districts, architectural design, streetscapes and manufactured landscapes. These valuable aesthetic elements of the human-made environment can be found throughout the unincorporated County, even though it is mostly undeveloped.

The proposed project has the potential to adversely affect visual resources. A Visual Resources Report shall be prepared to assess the impacts that will result from the construction and operation of this project.

The report must follow the format given in the County's Report Format and Content Requirements for Visual Resources, which can be found at: http://www.sdcounty.ca.gov/PDS/docs/Visual_Report_Formats.pdf.

The report must evaluate potentially adverse impacts to the environment according to the County's Guidelines for Determining Significance for Visual Resources, which can be found at: http://www.sdcounty.ca.gov/PDS/docs/Visual_Guidelines.pdf The report must be prepared by a visual resources analyst who is on the County's approved consultant list for completing Visual Resource Reports.

The attached [Memorandum of Understanding](#) must be executed by the applicant and consultant and subsequently submitted with the first iteration review.

ATTACHMENT F
SCOPE FOR AGRICULTURAL RESOURCES

The Agricultural memo, dated February 25, 2019, that was provided is from a consultant who is not listed on the County's CEQA Consultant List for Agricultural Resources. The memo was reviewed and resulted in the following comments:

After a review of the site pursuant to the Guidelines for Determining Significance (Guidelines) for Agricultural Resources for the Cottonwood Sand Mining Project, the project would not be required to review direct on-site impacts to agricultural resources from the proposed project. Historically, the project site has not been in agricultural operation and is currently an existing golf course, approved per MUP (3300-61-090) in 1961. Additionally, the project site has been historically mined for sand along Sweetwater River. Therefore, the site would not be expected to contain important agricultural resources.

The proposed project site lies adjacent to potential agricultural resources within an agricultural preserve as well as Williamson Agricultural Contracts 6491-4900 A and 6492-4900 A (Contract). Portions of the Contract have been withdrawn, however, the remainder portions of 6491-4900 A and 6492-4900 A remained in effect. Indirect impact would be required for analysis unless further evidence is submitted that the remainder portions of the Contract and agricultural preserve are no longer in effect.

An Agricultural Resources Study would be required to analyze any potential indirect impacts, and to lessen impacts or mitigate, where necessary.

The agricultural analysis must be completed using the County's approved Guidelines for Determining Significance and Report Format and Content Requirements **for off-site indirect impacts** which can be found on the World Wide Web at:

<http://www.sdcounty.ca.gov/PDS/docs/AG-Guidelines.pdf> (Guidelines) and
<http://www.sdcounty.ca.gov/PDS/docs/AG-Report-Format.pdf> (Report Formats).

The attached Memorandum of Understanding must be executed by the applicant and consultant and subsequently submitted with the first iteration review.

Please note that the Study must be prepared by a consultant on the approved County list.

ATTACHMENT G

SCOPE FOR AIR QUALITY ANALYSIS

Project Specific Information: The proposed project has the potential to significantly contribute to an existing or projected air quality violation from proposed mining and reclamation activities and expose sensitive receptors to substantial pollutant concentrations. Therefore, the project is required to discuss the potential impacts to air quality and complete an Air Quality Analysis (Report).

At this time, the County does not have enough information to properly assess alternative options for processing and shipping materials. Thus, the Report should focus on the proposed project. As more information becomes available, the County may ask for additional analysis to be conducted for these other project options.

General Information: The County has approved *Guidelines for Determining Significance and Report Format and Content Requirements* dated March 19, 2007 which can be found here: <http://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AQ-Guidelines.pdf> and here: <http://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AQ-Report-Format.pdf>. The Report should be prepared pursuant to these guidance documents.

Due to the unique nature of the proposed project, construction and operational activities may not be distinctly different, and may not need to be discussed separately. Therefore, the Report should focus on identifying all potential impacts associated with project activities over the proposed 12-year period of mining and reclamation activities. If there are site preparation or construction activities anticipated at initiation of the project, those should be analyzed as well.

The air quality analysis must account for all onsite and offsite emissions-generating activities associated with the project, including but not limited to onsite and offsite vehicle use (e.g., on-road, off-road), excavation, earth movement, aggregate processing, material loading/stockpiling, material hauling truck trips, construction of support structures and access roads, and reclamation activities. Additionally, emissions associated with transport of necessary materials, including waste export, water import, or any other traffic associated with activities, must be included in the analysis.

There are existing sensitive receptors located in close proximity to the project site. The impact of project activities on these receptors from dust emissions, criteria pollutants and toxic air contaminants must be addressed in the Report.

Emissions of pollutants of concern from the proposed project may occur from proposed activities. In general, emissions from project activities include:

- Particulate matter less than 10 microns and 2.5 microns (PM₁₀ and PM_{2.5}) from grading/excavation and soil disturbance, demolition activities, road improvements, equipment (mobile and stationary), haul trucks, vendor vehicles, stockpiling, material transport/movement, and worker commute vehicles;

- Products of combustion, including toxic air contaminants, from equipment, haul truck, vendor vehicles, worker commute vehicles and stationary sources (such as generators, if any);
- Volatile organic compound (VOC) emissions from use of equipment;
- Onsite energy consumption using natural gas or other fuels; and
- Queuing of vehicles at traffic lights can result in concentration of emissions, known as “hot spots”. Given the status of the San Diego Air Basin, principal emissions of concern are carbon monoxide (CO), VOC, and nitrogen oxides (NO_x). In order to adequately assess emissions during build-out of the area, the analysis should assess level of service impacts along major roadways.

Additionally, the following issues should be addressed as a part of the air quality analysis:

1. Would the proposed project conflict or obstruct the implementation of the San Diego Regional Air Quality Strategy (RAQs) or applicable portions of the State Implementation Plan (SIP)?
2. Would the proposed project result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation?
3. Since San Diego County is presently in non-attainment for the federal and/or State ambient air quality standards for ozone and PM₁₀ and PM_{2.5}, would the proposed project result in a cumulatively considerable net increase of PM₁₀, PM_{2.5} or exceed quantitative thresholds for ozone precursors, NO_x, and VOCs? The analysis should also provide a detailed discussion on cumulative impacts, framed in light of past, present and reasonable anticipated future projects in the project area. This should include a discussion on other projects contribution of PM₁₀, PM_{2.5}, and ozone precursors.
4. Would the proposed project expose sensitive receptors (schools, hospitals, resident care facilities, or day-care centers) to substantial pollutant concentrations? This analysis should discuss the proximity of any surrounding or proposed sensitive receptors to pollutant emissions generated onsite from diesel equipment. A health risk assessment should be included to calculate the incremental increases in cancer risk, as well as chronic, and acute health risk associated with toxic air contaminants, including diesel particulate matter (DPM) from off-road and on-road diesel equipment, as well as fugitive dust emissions, which could contain crystalline silica, or other toxic substances. Toxic air contaminant emissions should be quantified for off-road equipment use and fugitive dust generation during mining activities, and for heavy-duty diesel trucks hauling materials from the project site. The HRA shall be prepared in accordance with industry accepted methods and guidelines (e.g., Office of Environmental Health Hazard Assessment) and San Diego Guidelines for Determining Significance and Report Format and Content Requirements (*see the links below for additional information*).
5. Would the proposed project have the potential to generate offensive odors? The analysis should discuss the potential sources of odorous emissions from the proposed project and if the project will cause an odor nuisance to the nearby public.

Mitigation measures shall be included to reduce any identified potentially significant impacts. The Report shall also include a discussion of the level of mitigation achieved by the proposed

mitigation, including quantification or substantial evidence where appropriate, to show how mitigation reduces identified impacts.

The attached [Memorandum of Understanding](#) must be executed by the applicant and consultant and subsequently submitted with the first iteration review.

Health Risk Assessment Helpful Links:

Office of Environmental Health Hazard Assessment (OEHHA)

<https://oehha.ca.gov/air/air-toxics-hot-spots>

County Air Pollution Control District (APCD)

https://www.sandiegocounty.gov/content/dam/sdc/apcd/PDF/Toxics_Program/APCD_Hot_Spots_Supplemental_Guidelines.pdf

Calculation Procedures (APCD)

https://www.sandiegocounty.gov/content/sdc/apcd/en/engineering/Permits/Engineering_Emissions_Inventory/Mineral_Products_Calc.html

ATTACHMENT H

SCOPE FOR BIOLOGICAL RESOURCES REPORT

Project Specific Information: The Cottonwood Sand Mining Project is located within the Sweetwater River Valley on an existing golf course. As proposed, the project would produce 4.8-million cubic yards of mineral resource in three phases over a 10-year period, with two additional years of reclamation. The project would be reclaimed to an end use of open space, with limited areas designated for future development. The project would impact approximately 250 acres of the roughly 280-acre project site.

The project is located within the South County Multiple Species Conservation Program (MSCP) Subarea Plan. The majority of the site is within the unincorporated lands in the Metro-Lakeside-Jamul segment of the MSCP, with several portions within the Pre-Approved Mitigation Area (PAMA). A portion of the project in the western portion of the site is within the South County segment of the MSCP and is designated as a Minor Amendment Area. As proposed, the project would be required to process a Minor Amendment and a Major Amendment, which requires concurrence from the California Department of Fish & Wildlife (CDFW) and the U.S. Fish & Wildlife Service (USFWS). Major Amendments require additional environmental review and processing that may cause project delays.

The project is adjacent to federally protected land and proposes direct impacts to these lands. The project should be designed to avoid and minimize potential direct and indirect impacts to conserved lands.

Please include the results of the 2019 rare plant surveys in the Full Biological Resources Report following completion of the rare plant surveys, and update impacts and proposed mitigation for rare plants accordingly, as well as potential to occur on site, as applicable. Please include a thorough discussion in the potential to occur table of the Full Biological Resources Report for **all plant species** listed in the **Comprehensive List of Sensitive Species** below. As stated in the County's Biological Mitigation Ordinance (BMO), during project design, first priority shall be given to avoidance of impacts to populations of sensitive plant species listed on the Critical Populations of Sensitive Plant Species within the South County MSCP subarea (Attachment C of Document No. 0769999 on file with the Clerk of the Board). Where complete avoidance is infeasible, County staff will work with the project proponent to design the project to minimize impacts to the Critical Population to the maximum extent practicable.

Impacts to Narrow Endemic Plant Species within the South County MSCP Subarea (Attachment E of Document No. 0769999 on file with the Clerk of the Board), or Sensitive Plant Species, as defined, that meet the criteria in **Group A or B**, shall be avoided to the maximum extent practicable, as stated in the County's BMO. Where complete avoidance is infeasible, encroachment may be authorized, depending on the sensitivity of the individual species and the size of the population, except that encroachment shall not exceed 20 percent of the population on-site. Where impacts are allowed, in-kind preservation shall be required at a 1:1 to 3:1 ratio, depending on the sensitivity of the species and population size, as determined in a biological analysis approved by the Director of PDS.

Sensitive Plant Species, as defined in **Groups C and D**, shall be protected by using the design requirements and habitat-based mitigation requirements set forth in Section 86.505 and Section 86.506 of the County's BMO. Notwithstanding the foregoing, when said design requirements and habitat-based mitigation would have the effect of substantially reducing the viability of the affected population or the species, mitigation shall be in-kind, and the mitigation required will be set at a ratio based on the sensitivity of the species and population size, as determined in a biological analysis approved by the Director of PDS.

Please include in the Full Biological Resources Report the results of the habitat assessments, focused surveys, and/or protocol surveys, as applicable, for wildlife species listed in the **Comprehensive List of Sensitive Species** below, including a thorough discussion in the potential to occur table for **all wildlife species** listed in the Comprehensive List of Sensitive Species. As stated in the County's BMO, impacts to Rare, Narrow Endemic Animal Species within the South County MSCP subarea (Attachment D of Document No. 0769999 on file with the Clerk of the Board) shall be avoided to the maximum extent practicable. Avoidance requirements shall meet any species specific requirements set forth in Table 3-5 of the MSCP Plan, including any applicable limitations on clearing of occupied habitat. Where complete avoidance is infeasible, projects shall be designed to avoid any significant reduction in species viability.

As stated in the County's BMO, if it is determined in the Full Biological Resources Report that burrowing owl habitat occurs within the project site, impacts to Burrowing Owl Habitat shall be avoided to the maximum extent practicable. Where impacts are unavoidable, the following mitigation measures shall be required: (1) any impacted individuals must be relocated out of the impact area using passive or active methodologies approved by CDFW and USFWS (Wildlife Agencies); (2) mitigation for impacts to occupied habitat must be through the conservation of occupied burrowing owl habitat or lands appropriate for restoration, management and enhancement of burrowing owl nesting and foraging requirements at a ratio of no less than 1:1 for the territory of the burrowing owl.

Should arroyo toad habitat occur within or adjacent to the project site, impacts to upland habitats within 1 km of riparian habitat which supports or is likely to support arroyo toad shall be minimized to the maximum extent practicable, as stated in the County's BMO.

Conditions shall be developed for the project, as stated in the County's BMO, as the project site is located within and/or adjacent to Least Bell's Vireo habitat. The conditions will include monitoring and to control the population of brown-headed cowbirds.

For other sensitive animal species, as defined in Section 86.508 of the County's BMO, impacts will be mitigated through habitat based mitigation requirements, as set forth in Section 86.506 of the County's BMO. In any case in which mitigation would have the effect of substantially reducing the viability of the affected population or the species, mitigation shall be in-kind and the mitigation required will be set at a ratio based on the sensitivity of the species and the population size, as determined in a biological analysis approved by the Director of PDS.

As stated in the County's BMO and set forth in the terms of the MSCP Plan and/or Subarea Plan, project Applicants shall be required to comply with other applicable species-specific conditions set forth in Table 3-5 of the MSCP Plan as a condition of project approval.

The project is adjacent to Open Space Easements, which will require Limited Building Zone Easements. The Limited Building Zone Easements are 100 feet wide and extend outward from the Open Space Easement boundaries. The Limited Building Zone Easements wouldn't preclude the project from grading or clearing, but would prohibit the construction of houses, barns, or other habitable structures that would require fire clearing into the Open Space Easements.

The site contains jurisdictional waters of the U.S./State and/or wetlands protected by the County's Resource Protection Ordinance (RPO). Impacts to jurisdictional waters will require permitting from the authorizing resource agencies (i.e. Regional Water Quality Control Board, CDFW, and/or U.S. Army Corps of Engineers, as applicable) and/or compliance with the RPO, as appropriate, or verification from the resource agencies that permits are not required. The project site should also be assessed for potential impacts to groundwater-dependent vegetation species. Vernal pools and their watersheds in naturally occurring complexes and wetlands shall be avoided to the maximum extent practicable, if they occur within the project site, as stated in the County's BMO.

The Sweetwater River Valley is known to support a variety of sensitive plant and animal species. Some sensitive species are covered by the South County MSCP Subarea Plan. Several federally endangered and/or threatened species have been identified on the project site or within the vicinity of the project, including, but not limited to, least Bell's vireo, coastal California gnatcatcher, and San Diego ambrosia. Critical habitat for California gnatcatcher, southwestern willow flycatcher, least Bell's vireo, and San Diego ambrosia have been designated within or near the project site. The site may contain species that are not covered by the South County MSCP Subarea Plan, such as Quino checkerspot butterfly and San Diego fairy shrimp (per 2006 code case). Impacts to such species may require a Section 7 consultation or Section 10 permit from the U.S. Fish and Wildlife Service.

The project contains nearly the entire habitat linkage between the McGinty Mountain/Sequan Peak-Dehesa Biological Resource Core Area (BRCA) and the Sweetwater Reservoir/San Miguel Mountain BRCA. Analysis of potential project impacts to wildlife movement through this linkage will be required and BMO findings will need to be made prior to project approval.

The Rancho San Diego Specific Plan approved a golf course at the proposed site as a "public facility". With a change in land use, it needs to be evaluated whether a change in land use and public facility status changes the mitigation requirements associated with the project. The Specific Plan indicates that the golf course may serve as part of a buffer zone to act as a physical barrier to sensitive habitat areas from existing human activities. The potential direct and indirect impacts of mining operations within this buffer area should be evaluated. Please provide evidence of permits or other documentation to demonstrate lawful clearing of the project site. If no permits are provided, forensic analysis and appropriate mitigation may be required.

General Information: A Full Biological Resources Report must be prepared in accordance with the County's Report Format and Content Requirements Biological Resources, which can be found at https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/Biological_Report_Format.pdf. The report will provide a qualitative and quantitative analysis of all on and off-site biological impacts (both direct and indirect) related to all phases of the project and include resource mapping with the most current project plan and any proposed Open Space and Limited Building Zone Easements. The County staff biologist reviewing the Biological Resource Report will hold an onsite meeting with the biology consultant for field verification after the first iteration report is submitted. At the discretion of the County staff biologist, the field meeting may be waived with a written explanation. In order to comply with the California Environmental Quality Act requirements, the report must also be in compliance with the County's Guidelines for Determining Significance, which can be found at https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/Biological_Guidelines.pdf.

Staff has prepared and attached a comprehensive list of sensitive species that may exist on the project site. Directed species-specific habitat assessments and/or protocol surveys are required for species shown in **boldface** type in the **Comprehensive List of Sensitive Species** below. The **Full Biological Resource Report** shall address the potential for each sensitive species listed in the **Comprehensive List of Sensitive Species** below, including species not shown in boldface (table format). For further guidance please see the County's Report Format and Content Requirements.

PDS has also determined that the report shall include ***a habitat assessment (and focused surveys, if appropriate)*** for the following rare, threatened, and endangered species: *rare plants, San Diego fairy shrimp, herpetological studies (eg. arroyo toad), Stephen's kangaroo rat, southwestern willow flycatcher, Quino checkerspot butterfly, coastal California gnatcatcher, and least Bell's vireo*. The habitat assessment and focused survey(s), as applicable, must be done by biologist(s) with demonstrable knowledge in field detection of the subject species (focused surveys for Federally listed species shall be in compliance with USFWS protocol, when such protocol exists, and must be done by a USFWS permitted biologist -- contact the USFWS at (760) 431-9440). If no protocol has been established, the methods of the directed search shall be described in the report. At a minimum, focused surveys must consist of walking transects across all areas with potential habitat for the species. The point locations and inferred territories of these species shall be included on the biological resources map. Focused surveys reports may be attached to the Full Biological Resources Report in appendix form, but survey results must be evaluated in the Full Biological Resources Report.

The Full Biological Resources Report must also propose applicable and feasible mitigation measures. Examples are listed in Appendix D of the County's Report Format and Content Guidelines.

Open Space Easements – If biological open space is proposed, please submit a project-scale Open Space Map. The Open Space Map must show what biological resources are being protected and include a table showing the area (in acres) of land preserved according to vegetation type. All Biological Open Space Easements shall be protected from future fire-

clearing through the dedication of a Limited Building Zone Easement. This easement is 100 feet wide and extends outward from the Biological Open Space Easement boundary. The Limited Building Zone Easement wouldn't preclude the project from grading or clearing, but does prohibit the construction of houses, barns, or other habitable structures that would require fire clearing into the Biological Open Space.

All existing and proposed Open Space Easements (biological resource & limited building zones) must be clearly shown on the plans/map and on the preliminary grading plan.

In association with any proposed open space easements, temporary and/or permanent fencing and permanent signs may be required to protect the easements. These conditions are meant to protect from inadvertent disturbance of all open space easement(s) that do not allow grading, brushing or clearing. The open space fencing/signage plan for the proposed biological open space easement must be clearly shown on the preliminary grading plan and on the Open Space Map.

Proposed Off-site Mitigation – If off-site mitigation is proposed to mitigate for significant biological impacts, please provide a statement indicating where the off-site mitigation will be located. If the off-site mitigation will be obtained in a mitigation bank, please provide the name of the bank along with evidence that such credits can be allocated for this project. If the off-site mitigation will be through the purchase and preservation of other off-site land, please provide sufficient information for staff to evaluate the off-site resources and the means to preserve the resources in perpetuity.

MSCP – The site is located within the County's Multiple Species Conservation Program (MSCP). The site is located within the Metro-Lakeside-Jamul segment of the County's South County Multiple Species Conservation Program (MSCP). A portion of the site is designated as Pre-approved Mitigation Area (PAMA). As such, the project must comply with the Biological Mitigation Ordinance (BMO), the County ordinance for implementing the MSCP. By the project's conformance with the BMO, the project will comply with the Federal and State Endangered Species Acts for species covered by MSCP. County staff will evaluate the project for conformance and will write MSCP Findings after a biological resources report has been reviewed and accepted as complete. No project shall be approved until each MSCP Finding is satisfied and the project is found to conform to the MSCP and the BMO. Costs for writing these findings have been included in the attached Environmental Cost Estimate.

MSCP Major and Minor Amendment Area – As proposed, a portion of the project site is located within a designated Minor Amendment area. Any impacts to the National Wildlife Refuge would require a Major Amendment. Both types of amendments require concurrence from the CDFW and USFWS. Major Amendments involve Federal Register Notice and an environmental document that addresses both state and federal environmental requirements (CEQA and NEPA). Please note that Major Amendment areas in particular can take years to complete and could result in significant delays in the processing of the project. Requests for Major and Minor Amendments will be in coordination with the Wildlife Agencies (CDFW and USFWS) in conformance with all applicable laws and regulations.

RPO – The project site contains a natural drainage that may qualify as a wetland under the San Diego County Resource Protection Ordinance (RPO). The Resource Protection Ordinance prohibits impacts to wetlands and wetland buffers. These natural features are a significant constraint for land uses on the project site and may affect project design. The biological information requested below is required for staff to determine project compliance with the RPO.

Wetlands Survey – A wetlands survey must be completed using the wetlands definition in the County's Resource Protection Ordinance (RPO). The County's definition of wetlands varies from the federal U.S. Army Corps of Engineers' definition. All RPO wetlands shall be mapped on the Biological Resources Map using aerial photographs and a field site visit. Should there be a disagreement over the extent of wetlands, staff may require further surveys using the U.S. Army Corps of Engineers standards and guidance for conducting wetland delineations.

The RPO requires buffers on all RPO wetlands. The biological resources map shall designate an appropriate wetland buffer width of 50-200 feet, depending on the biological resources present. The RPO prohibits impacts to wetlands and wetland buffers. Any part of the site that is a wetland and/or a wetland buffer must be placed into a dedicated Biological Open Space Easement. All Biological Open Space Easements shall be protected from future fire-clearing through the dedication of a Limited Building Zone Easement. This easement is 100 feet wide and extends outward from the Biological Open Space Easement boundary. The Limited Building Zone Easement prohibits the construction of houses, barns, or other habitable structures that would require fire clearing into the Biological Open Space. Once the wetland(s), wetland buffer(s) and limited building zone easement(s) are mapped, redesign of the proposed project may be required.

Jurisdictional Resources – PDS staff has determined that the project may disturb wetlands, lakes, streams, and/or waters of the U.S./State. Such disturbance may require notification to the Regional Water Quality Control Board (RWQCB), California Department of Fish and Wildlife (CDFW), and/or the Army Corps of Engineers (ACOE). PDS recommends that you contact the above agencies about the permitting requirements for potential disturbances to wetlands, lakes, streams, and/or waters of the U.S./State. If such permitting requirements are incorporated into the project at this time, it may prevent future delays or changes in the project design. RWQCB general information and submittal information can be obtained through the RWQCB website https://www.waterboards.ca.gov/rwqcb9/water_issues/programs/401_certification/index.html or by contacting the general information number at (619) 521-1990. CDFW general information and submittal information can be obtained through the CDFW website <https://www.wildlife.ca.gov/Conservation/LSA> or by contacting the CDFW South Coast Regional Office at (858) 636-3160. Information for consultation and formal submittal of the 404 Permit application required by the ACOE can be obtained through their website at: <http://www.spl.usace.army.mil/regulatory/> or through the general information number at (858) 674-5387. When a formal wetland delineation is requested, the ACOE 1987 Wetland Delineation Manual and "Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0)" should be used (http://www.usace.army.mil/Missions/CivilWorks/RegulatoryProgramandPermits/reg_supp.aspx).

Please be aware that the County will not issue any permit authorizing land disturbance (e.g., grading permits) which may disturb wetlands, lakes, streams, and/or waters of the U.S. until all required permits/agreements from these agencies have been obtained or are determined to be not required.

Indirect Impacts – Indirect impacts may be the result of secondary effects from direct impacts or those impacts that over time cause the degradation of a resource by changing its function, health or quality. Unlike direct impacts that are typically one-time effects, indirect impacts often continue in the long term and may actually increase.

Indirect impacts commonly result from a project's "edge effects." Edge effects from development may extend several hundred feet into adjacent open space areas, causing significant changes in species composition, diversity and abundance in those nearby lands. Projects can have a wide variety of indirect impacts depending on the nature of the project, the type of resources present, and the type and degree of edge effects. Certain restrictions may be required when the project proposes significant noise within close proximity to existing or proposed open space.

Migratory Bird Treaty Act – The site appears to have mature native and/or ornamental trees which may be used for nesting by migratory birds. Any grading, brushing or clearing conducted during the migratory bird breeding season, February 1 – August 31, has a potential to impact nesting or breeding birds in violation of the Migratory Bird Treaty Act. The applicant may submit evidence that nesting or breeding migratory birds will not be affected by the grading, brushing or clearing to these agencies: California Department of Fish and Wildlife, 3883 Ruffin Rd., San Diego, CA 92123, (858) 467-4201, <http://www.dfg.ca.gov/>; and United States Fish and Wildlife Service, 6010 Hidden Valley Rd, Carlsbad, CA 92011-4219, (760) 431-9440, <http://www.fws.gov/>.

The **Memorandum of Understanding** must be executed by the applicant and consultant, and subsequently submitted with the first iteration review.

Comprehensive List of Sensitive Species

Plant	Animal	Latin Name	Common Name	Directed Survey Required
X		<i>Acanthomintha ilicifolia</i>	San Diego Thornmint	X
X		<i>Achnatherum diegoensis</i>	San Diego needlegrass	
X		<i>Adolphia californica</i>	San Diego adolphia	X
X		<i>Ambrosia pumila</i>	San Diego Ambrosia	X
X		<i>Artemisia palmeri</i>	Palmer's sage	
X		<i>Astragalus deanei</i>	Dean's Milkvetch	X
X		<i>Atriplex parishii</i>	Parish brittlescale	X
X		<i>Baccharis vanessae</i>	Encinitas Baccharis	X

X	<i>Brodiaea filifolia</i>	Thread leaved brodiaea	X
X	<i>Brodiaea orcuttii</i>	Orcutt's brodiaea	X
X	<i>Calandrinia breweri</i>	Brewer's calandrinia	
X	<i>Calochortus catalinae</i>	Catalina mariposa lily	
X	<i>Camissonia lewisii</i>	Lewis sun cup	
X	<i>Caulanthus stenocarpus</i>	Slender Pod Jewellflower	X
X	<i>Ceanothus cyaneus</i>	Lakeside ceanothus	X
X	<i>Ceanothus verrucosus</i>	Wart stemmed ceanothus	X
X	<i>Centromadia parryi australis</i>	Southern tarplant	X
X	<i>Centromadia pungens laevis</i>	Smooth tarplant	X
X	<i>Chorizanthe polygonoides longispina</i>	Long spined-spine flower	X
X	<i>Chorizanthe procumbens</i>	Prostrate spineflower	X
X	<i>Clarkia delicata</i>	Campo clarkia	X
X	<i>Comarostaphylos diversifolia diversifolia</i>	Summer holly	X
X	<i>Convolvulus simulans</i>	Small flowered morning glory	
X	<i>Cupressus forbesii</i>	Tecate cypress	X
X	<i>Deinandra (Hemizonia) conjugens</i>	Otay tarplant	X
X	<i>Dichondra occidentalis</i>	Western dichondra	
X	<i>Dudleya variegata</i>	Variegated dudleya	X
X	<i>Dudleya viscida</i>	Sticky dudleya	X
X	<i>Ericameria palmeri palmeri</i>	Palmer's goldenbush	X
X	<i>Erodium macrophyllum var macrophyllum</i>	Large leaf fillary	X
X	<i>Eryngium aristulatum parishii</i>	San Diego button celery	X
X	<i>Ferocactus viridescens</i>	Coast barrel cactus	X
X	<i>Fremontodendron mexicanum</i>	Mexican flannelbush	X
X	<i>Githopsis diffusa filicaulis</i>	Mission canyon bluecup	
X	<i>Harpagonella palmeri</i>	Palmer's grappling hook	
X	<i>Holocarpha virgata elongata</i>	Graceful tarplant	
X	<i>Hordeum intercedens</i>	Vernal barley	
X	<i>Iva hayesiana</i>	San Diego marsh elder	X
X	<i>Juglans californica</i>	California black walnut	
X	<i>Juncus acutus leopoldii</i>	Southwestern spiny rush	
X	<i>Lepidium virginicum robinsonii</i>	Robinson pepper grass	X
X	<i>Microseris douglasii platycarpa</i>	Small flowered microseris	
X	<i>Mimulus diffusus</i>	Palomar monkey flower	
X	<i>Monardella linoides viminea</i>	Willow monardella	X
X	<i>Muilla clevelandii</i>	San Diego goldenstar	X
X	<i>Myosurus minimus apus</i>	Little mousetail	
X	<i>Navarretia fossalis</i>	Spreading navarretia	X
X	<i>Nolina cismontana</i>	Chapparal beargrass	X
X	<i>Nolina interrata</i>	Dehesa beargrass	X
X	<i>Ophioglossum californicum</i>	California adder's tongue fern	
X	<i>Pentachaeta aurea</i>	Golden-rayed pentachaeta	
X	<i>Perideridia gairdneri gairdneri</i>	Gairdner's yampah	
X	<i>Piperia cooperi</i>	Cooper's rein orchid	

X	<i>Piperia leptopetala</i>	Narrow-petaled rein orchid	
X	<i>Pogogyne nudiuscula</i>	Otay mesa mint	X
X	<i>Quercus cedrosensis</i>	Cedros Island oak	X
X	<i>Quercus dumosa</i>	Nuttall's scrub oak	X
X	<i>Quercus engelmannii</i>	Engelmann oak	
X	<i>Salvia munzii</i>	Munz sage	X
X	<i>Selaginella cinerascens</i>	Mesa club moss	
X	<i>Senecio aphanactis</i>	Rayless ragwort	X
X	<i>Stemodia durantifolia</i>	Blue streamwort	X
X	<i>Viguiera laciniata</i>	San Diego sunflower	
	X <i>Accipiter cooperi</i>	Cooper's hawk	X
	X <i>Accipiter striatus</i>	Sharp-shinned hawk	X
	X <i>Agelaius tricolor</i>	Tricolored blackbird	X
	X <i>Aimophila ruficeps canescens</i>	Rufous-crowned sparrow	X
	X <i>Ammodramus savannarum</i>	Grasshopper sparrow	X
	X <i>Amphispiza belli belli</i>	Bell's sage sparrow	X
	X <i>Anniella pulchra pulchra</i>	Silvery legless lizard	
	X <i>Antrozous pallidus</i>	Pallid bat	
	X <i>Aquila chrysaetos</i>	Golden eagle	X
	X <i>Ardea herodias</i>	Great blue heron	
	X <i>Asio otus</i>	Long-eared owl	X
	X <i>Athene cunicularia hypugea</i>	Burrowing owl	X
	X <i>Bassariscus astutus</i>	Ringtail	
	X <i>Branchinecta sandiegoensis</i>	San Diego fairy shrimp	X
	X <i>Branta canadensis</i>	Canada goose (Winter)	
	X <i>Bufo microscaphus californicus</i>	Arroyo toad	X
	X <i>Buteo lineatus</i>	Red-shouldered hawk	X
	X <i>Buteo regalis</i>	Ferruginous hawk (Winter)	X
	X <i>Butorides striatus</i>	Green heron	
	X <i>Campylorhynchus brunnicapillus couesi</i>	San Diego cactus wren	X
	X <i>Cathartes aura</i>	Turkey vulture	X
	X <i>Chaetodipus californicus femoralis</i>	Dulzura California pocket mouse	
	X <i>Chaetodipus fallax fallax</i>	Northwestern San Diego pocket mouse	
	X <i>Charina trivirgata roseofusca</i>	Coastal rosy boa	
	X <i>Choeronycteris mexicana</i>	Mexican long-tongued bat	
	X <i>Circus cyaneus hudsonius</i>	Northern harrier	X
	X <i>Clemmys marmorata pallida</i>	Southwestern pond turtle	X
	X <i>Cnemidophorus hyperythrus</i>	Orange-throated whiptail	X
	X <i>Cnemidophorus tigris multiscutatus</i>	Coastal western whiptail	
	X <i>Coccyzus americanus occidentalis</i>	Yellow-billed cuckoo	X
	X <i>Coleonyx variegatus abbottii</i>	San Diego banded gecko	X
	X <i>Corynorhinus townsendii</i>	Townsend's big-eared bat	
	X <i>Crotalus ruber ruber</i>	Northern red diamond rattlesnake	
	X <i>Danaus plexippus</i>	Monarch butterfly	
	X <i>Dendroica petechia brewsteri</i>	Yellow warbler	

	X	<i>Diadophis punctatus similis</i>	San Diego ringneck snake	
	X	<i>Dipodomys stephensi</i>	Stephen's kangaroo rat	X
	X	<i>Elanus caeruleus</i>	White-tailed kite	X
	X	<i>Empidonax trailii extimus</i>	Southwestern willow flycatcher	X
	X	<i>Eremophila alpestris actis</i>	Horned lark	
	X	<i>Euderma maculatum</i>	Spotted bat	
	X	<i>Eumeces skiltonianus interparietalis</i>	Coronado skink	
	X	<i>Eumops perotis californicus</i>	Greater western mastiff bat	
	X	<i>Euphydryas editha quino</i>	Quino checkerspot butterfly	X
	X	<i>Euphys vestris harbisoni</i>	Dun skipper	X
	X	<i>Falco columbarius</i>	Merlin (Winter)	
	X	<i>Falco mexicanus</i>	Prairie falcon	X
	X	<i>Felis concolor</i>	Mountain lion	
	X	<i>Ictera virens</i>	Yellow-breasted chat	X
	X	<i>Lanius ludovicianus</i>	Loggerhead shrike	X
	X	<i>Larus californicus</i>	California gull (Non-breeding)	
	X	<i>Lasiurus blossevillii</i>	Western red bat	
	X	<i>Lepus californicus bennettii</i>	San Diego black-tailed jackrabbit	
	X	<i>Lycaena hermes</i>	Hermes copper	X
	X	<i>Macrotus californicus</i>	California leaf-nosed bat	
	X	<i>Myotis ciliolabrum</i>	Small-footed myotis	
	X	<i>Myotis yumanensis</i>	Yuma myotis	
	X	<i>Neotoma lepida intermedia</i>	San Diego desert woodrat	
	X	<i>Nyctinomops macrotis</i>	Big free-tailed bat	
	X	<i>Nyctinomops femorosaccus</i>	Pocketed free-tailed bat	
	X	<i>Odocoileus hemionus</i>	Southern mule deer	
	X	<i>Onychomys torridus ramona</i>	Southern grasshopper mouse	
	X	<i>Phobetus robinsoni</i>	Robinson's beetle	
	X	<i>Phrynosoma coronatum blainvillei</i>	San Diego horned lizard	
	X	<i>Polioptila californica californica</i>	California gnatcatcher	X
	X	<i>Pyrocephalus rubinus</i>	Vermilion flycatcher	X
	X	<i>Rana aurora draytoni</i>	California red -legged frog	X
	X	<i>Salvadora hexalepis virgultea</i>	Coast patch-nosed snake	
	X	<i>Sialia mexicana</i>	Western bluebird	
	X	<i>Spea (Scaphiopus) hammondii</i>	Western spadefoot toad	
	X	<i>Taxidea taxus</i>	American badger	
	X	<i>Thamnophis hammondii</i>	Two stripe garter snake	X
	X	<i>Thamnophis sirtalis novum</i>	South Coast garter snake	
	X	<i>Tyto alba</i>	Common barn-owl	
	X	<i>Vireo bellii pusillus</i>	Least Bell's vireo	X

The [Memorandum of Understanding](#) must be executed by the applicant and consultant, and subsequently submitted with the first iteration review.

ATTACHMENT I CULTURAL RESOURCES

CULTURAL SURVEY AND HISTORIC EVALUATION

Project Specific Information: County records, as well as the database from the South Coastal Information Center have been reviewed for the proposed project site. Per the submitted project description, areas of the project site have been previously mined, and other areas are heavily disturbed due to extensive landscaping and development of the existing golf course. Dispersed portions of the project site were surveyed in 2005 by Laguna Mountain Environmental for a golf course enhancement project. That study was positive for resources.

Cultural/historical resources have been previously recorded within and adjacent to the project site, the potential processing plant site, and the potential loadout facility. Buildings that appear to be older than 50 years, including the Cottonwood Clubhouse, are also present within the project site. In addition, the prior cultural studies and site records do not address potential impacts to Tribal Cultural Resources (TCRs). Therefore, an updated cultural study will be required.

The study should initially include: an updated records search, an analysis of TCRs to be supplemented by County Staff's Native American consultation, an evaluation of the significance of any historic structures on site, and a field survey. The field survey should focus on access roads, off-site improvements, and areas that have not been extensively disturbed previously (e.g. areas previously mined). The study should also take into account the geologic conditions (referencing any geotechnical studies if possible) to assess whether there is any potential to encounter unknown, subsurface, cultural resources during any phases of the proposed project. The standard requirements for cultural studies are outlined below.

Native American Consultation: Staff will conduct outreach with the Native American communities for the purpose of AB-52 consultation. The intent of Native American consultation is to allow tribes an opportunity to participate in local land use decisions at an early planning stage for the purpose of protecting, or mitigating impacts to Native American cultural resources. Your presence at consultation meetings with the tribes may be requested to address their issues and concerns.

General Cultural Study Requirements:

General Information: A field survey (including off-site improvements) for the presence of archaeological or tribal cultural resources and/or an evaluation of the site as a historic resource must be conducted in accordance with the Resource Protection Ordinance (RPO), Section 21083.2 of the Public Resources Code (CEQA), and the San Diego County CEQA Guidelines. The survey must provide evidence in the form of a letter from the South Coastal Information Center (SCIC) that an institutional record searches has been conducted. In addition, a field survey and/or evaluation by a County approved archaeologist/historian must be conducted. The report must follow the required report format as outlined in the Report Format and Content Guidelines. Please complete all appropriate DPR Series 123 forms and submit them to the

South Coastal Information Center and PDS. A Kumeyaay Native American monitor is required during the survey for archaeological resources. The study must include a discussion of the absence or presence of tribal cultural resources and must include a Sacred Lands check with the Native American Heritage Commission (NAHC). The study must provide the results of outreach with listed tribes provided by the NAHC.

Guidelines for Determining Significance and Report Format and Content Guidelines can be obtained from the County website at:

<http://www.sdcountry.ca.gov/dplu/Resource/3~procguid/3~procguid.html#arch>

If no cultural resources are identified, a brief letter report will be satisfactory documentation of the survey.

If the survey is positive for resources, scientific evidence must be provided to substantiate (a) the resources' significance, and (b) the boundaries of the resource(s). If the resources extend off-site, these must be shown on the map and discussed. The report must address both CEQA and County RPO significance criteria for each resource as outlined in the Guidelines for Determining Significance. The report must address the direct construction impacts to resources (both on- and off-site) and make a determination as to impact severity. Any resource(s) that will be exposed to indirect impacts from the project should be addressed as well.

All project specific archaeological/cultural site location maps and figures must be submitted under a separate confidential appendix that clearly states that the contents are not for public review.

Archaeological Significance Testing

Project Specific Information: Depending on the results of the archaeological survey, significance testing may be necessary. If resources are present, avoidance must be considered as the first option. If avoidance is not feasible, then significance testing must be conducted.

General Information: If the project design will impact cultural resources, a County approved archaeologist must conduct scientific testing to determine the significance, boundaries, and area (square meters/yards) of the resource(s). A Kumeyaay Native American monitor must be present during the significance testing phase. All testing must be screened through a 1/8 inch mesh or finer screen unless the use of larger mesh has been approved by Planning & Development Services. Any faunal that is identified must be evaluated by a faunal professional. Testing shall be approved by Planning & Development Services prior to commencing fieldwork.

The project is exempt from the RPO (§86.505(d)). As such, mitigation should include avoidance (preservation) or data recovery. Avoidance (preservation) is the preferred method for mitigation. If avoidance is not feasible, then data recovery may be considered an appropriate mitigation measure. Data recovery must be conducted by a County approved archaeologist and the research design (data recovery plan) must be approved by Planning & Development Services prior to conducting fieldwork. A Native American monitor must be present during data recovery activities.

Preservation Plan

Archaeological Resources

If significance testing produces evidence that indicates resources are to be protected pursuant to the RPO, or if preservation is the form of mitigation selected for CEQA significant sites, the project should be redesigned, if necessary, to avoid impacts and preserve the resource(s). The report should address the need to cap the resource(s) with soil, gravel, jute landscape matting, and/or leaf compost to protect the site from indirect impacts. Open space easements or other measures should also be considered to prevent future impacts to resources.

Historic Resources

If the historic resource evaluation determines that a site is significant pursuant to CEQA, RPO, or the County's Guidelines for Determining Significance, the report must include a preservation plan. Adaptive reuse, open space easements, facade easements, and other conservation easements should be considered as mitigation. Specific performance criteria and/or easements should be proposed to guide future landowners.

Conveyance of Cultural Materials

The report shall include both the curation and repatriation of artifacts as options. Any human remains identified is subject to Public Resources Code §5097.98, CEQA §15064.5, Health & Safety Code §7050.5, and the County's RPO. Disposition of human remains and associated grave goods will be determined during consultation with the Most Likely Descendant.

The Memorandum of Understanding must be executed by the applicant and consultant and subsequently submitted with the first iteration review.

ATTACHMENT J
DRAFT PALEONTOLOGICAL RESOURCES CONDITIONS

(PALEONTOLOGICAL RESOURCES)

DURING CONSTRUCTION: *(The following actions shall occur throughout the duration of the grading construction).*

(PALEONTOLOGICAL RESOURCES)

PALEO#GR-1 PALEONTOLOGICAL MONITORING

INTENT: In order to comply with Mitigation Monitoring and Reporting Program pursuant to [REDACTED], a Paleontological Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** This project site has marginal levels of sensitive Paleontological resources. All grading activities are subject to the [County of San Diego Grading Ordinance Section 87.430](#), if any significant resources (Fossils) are encountered during grading activities.

- a. The grading contractor is responsible to monitor for paleontological resources during all grading activities. If any fossils are found greater than 12 inches in any dimension, stop all grading activities and contact PDS before continuing grading operations.
- b. If any paleontological resources are discovered and salvaged, the monitoring, recovery, and subsequent work determined necessary shall be completed by or under the supervision of a Qualified Paleontologist pursuant to the [San Diego County Guidelines for Determining Significance for Paleontological Resources](#).

TIMING: The following actions shall occur throughout the duration of the grading construction. **MONITORING:** The [DPW, PDC] shall make sure that the grading contractor is on-site performing the Monitoring duties of this condition. The [DPW, PDC] shall contact PDS if the grading contractor or applicant fails to comply with this condition.

ROUGH GRADING: *(Prior to rough grading approval and issuance of any building permit).*

(PALEONTOLOGICAL RESOURCES)

PALEO#GR-2 PALEONTOLOGICAL MONITORING

INTENT: In order to comply with the adopted Mitigation Monitoring and Reporting Program (MMRP) pursuant to [REDACTED], and the [County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Paleontological Resources](#), a Paleontological Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** One of the following letters shall be performed upon completion of the grading activities that require monitoring:

- a. If no paleontological resources were discovered, submit a "No Fossils Found" letter from the grading contractor to PDS stating that the monitoring has been completed

and that no fossils were discovered, and including the names and signatures from the fossil monitors. The letter shall be in the format of Attachment E of the [County of San Diego Guidelines for Determining Significance for Paleontological Resources](#).

- b. If paleontological resources were encountered during grading, a letter shall be prepared stating that the field grading monitoring activities have been completed, and that resources have been encountered. The letter shall detail the anticipated time schedule for completion of the curation phase of the monitoring.

DOCUMENTATION: The applicant shall submit the letter report to PDS for review and approval.

TIMING: Upon completion of all grading activities, and prior to Rough Grading Final Inspection ([Grading Ordinance SEC 87.421.a.2](#)), the letter report shall be completed. **MONITORING:** PDS shall review the final negative letter report or field monitoring memo for compliance with the project MMRP, and inform [DPW, PDCI] that the requirement is completed.

ATTACHMENT K
SCOPE FOR GEOLOGIC INVESTIGATION REPORT

Staff has reviewed the Project Description for the Cottonwood Sand Mine. The project, situated within the Sweetwater River watershed and in the floodplain of the Sweetwater River, includes mining sand suitable for Portland Cement Concrete use. The proposed project is set within the Jamacha Valley adjacent to the village of Jamacha and approximately 0.5 miles east of Rancho San Diego community, in an unincorporated area of San Diego County. It is understood that the property was previously classified by the California Geological Survey (CGS) as a combination of MRZ-3 and MRZ-4 with a small section of MRZ-2 land located on the northwest end of the property. Based on this information, a Geologic Investigation Report and a Mineral Resources Report are required.

GEOTECHNICAL INVESTIGATION REPORT:

To evaluate the stability of temporary and permanent slopes to be created for the project, a geotechnical investigation is required to be completed by a California Certified Engineering Geologist.

Study

Final Cut and Fill Slopes: The County Guidelines for Determining Significance – Geologic Hazards, indicate for final slopes the factor of safety shall be >1.5 for static and 1.1 for dynamic loads. Please provide slope stability analysis of final cut and fill slopes (deep-seated and surficial stability). If final slopes do not meet the factor of safety, please redesign the slopes as necessary to meet the factor of safety.

Temporary Cut and Fill Slopes: Provide stability analysis for all temporary cut and fill slopes in order to have an adequate factor of safety of >1.3 for static and 1.1 for dynamic loads. Given the long-term nature of this project and slopes potentially being in place for a number of years, it is important to be conservative to ensure the safety of on-site workers.

Shallow Groundwater Conditions: Given the project's location in the floodplain of the Sweetwater River, the geotechnical investigation should consider potential shallow groundwater conditions consistent with historical groundwater levels.

Compaction of Fill: For proposed backfilling activities, recommendation for fill and compaction of materials should be made within the geotechnical report.

The [Memorandum of Understanding](#) must be executed by the applicant and consultant and subsequently submitted with the first iteration review.

Please contact Leanne Crow, Hydrogeologist, at 858-495-5514 if you have any questions regarding these comments.

ATTACHMENT L HAZARDOUS MATERIALS USE/STORAGE ONSITE

Hazardous Materials Use/Storage Onsite

A review of your project indicates that there may be a possibility for onsite storage, use or transport of hazardous materials as a part of normal operations. Please provide additional detail regarding the types of uses and operations that will require hazardous materials storage, use and/or transport. Detail the types of hazardous materials (i.e. gasoline, petroleum, oils and solvents etc.) that would be stored onsite and **estimate the quantities** that would be stored onsite at any given time.

All storage, handling, transport, emission and disposal of hazardous substances shall be in full compliance with local, State, and Federal regulations. California Government Code § 65850.2 requires that no final certificate of occupancy or its substantial equivalent be issued unless there is verification that the owner or authorized agent has met, or is meeting, the applicable requirements of the Health and Safety Code, Division 20, Chapter 6.95, Article 2, Section 25500-25520.

The San Diego County Department of Environmental Health Hazardous Materials Division (DEH HMD) is the Certified Unified Program Agency (CUPA) for San Diego County responsible for enforcing Chapter 6.95 of the Health and Safety Code. As the CUPA, the DEH HMD is required to regulate hazardous materials business plans and chemical inventory, hazardous waste and tiered permitting, underground storage tanks, and risk management plans. The Hazardous Materials Business Plan is required to contain basic information on the location, type, quantity and health risks of hazardous materials stored, used, or disposed of onsite. The plan also contains an emergency response plan which describes the procedures for mitigating a hazardous release, procedures and equipment for minimizing the potential damage of a hazardous materials release, and provisions for immediate notification of the HMD, the Office of Emergency Services, and other emergency response personnel such as the local Fire Agency having jurisdiction. Implementation of the emergency response plan facilitates rapid response in the event of an accidental spill or release, thereby reducing potential adverse impacts. Furthermore, the DEH HMD is required to conduct ongoing routine inspections to ensure compliance with existing laws and regulations; to identify safety hazards that could cause or contribute to an accidental spill or release; and to suggest preventative measures to minimize the risk of a spill or release of hazardous substances.

Asbestos/Lead Surveys

The project site contains several commercial buildings and accessory structures on site, which may have been constructed prior to the ban on asbestos and lead. Due to the age of the structures and the potential for asbestos and/or lead to have been present in construction materials, the completion of lead and/or asbestos surveys will be required if the structures are scheduled to be demolished.

Draft Conditions:

HAZ #X–LEAD SURVEY [PDS, FEE X 2]

INTENT: In order to avoid hazards associated with lead based paint (LBP) and lead containing materials (LCM) to mitigate below levels of significance as established in the [County of San Diego Hazardous Materials and Existing Contamination Guidelines for Determining Significance](#), the structure(s) identified on the approved plot plan designated for demolition shall be surveyed for the presence of LBP/LCM because the structures may have been built prior to 1980. **DESCRIPTION OF REQUIREMENT:** A facility survey shall be performed to determine the presence or absence of LBP/LCM in the structures identified for demolition on the approved plot plan set. The survey shall be completed by a California Department of Health Services (DHS) certified lead inspector/risk assessor to determine the presence or absence of LBP and LCM located in the structure. The following conditions only apply if LBP and LCM are present:

- a. All LBP and LCM shall be managed in accordance with applicable regulations including, at a minimum, the hazardous waste disposal requirements (Title 22 California Code of Regulations [CCR] Division 4.5), the worker health and safety requirements (Title 8 California Code of Regulations Section 1532.1), and the State Lead Accreditation, Certification, and Work Practice Requirements (Title 17 CCR Division 1, Chapter 8).
- b. All LBP and LCM scheduled for demolition or disturbed during remodeling must comply with applicable regulations for demolition methods and dust suppression.

DOCUMENTATION: The applicant shall submit a letter or report prepared by a California DHS certified lead inspector/risk assessor to the [DEH HAZ MAT, APCD], which certifies that there was no LBP/LCM present, or all lead containing materials have been remediated pursuant to applicable regulations. **TIMING:** Prior building permit, the applicant shall comply with this condition. **MONITORING:** The [DEH HAZ MAT, APCD] shall review the report and any additional evidence for compliance with this condition. The [PDS, PCC] shall review the completed and stamped report and any additional evidence for compliance with this condition.

HAZ #2–ASBESTOS SURVEY [PDS, FEE X 2]

INTENT: In order to avoid hazards associated with Asbestos Containing Materials (ACMs) and to mitigate below levels of significance as established by the [County of San Diego Hazardous Materials and Existing Contamination Guidelines for Determining Significance](#), the structures identified on the approved Major Use Permit Plot Plan set for demolition shall be surveyed for the presence of ACMs because the structures were built prior to 1980. **DESCRIPTION OF REQUIREMENT:** A facility survey shall be performed to determine the presence or absence of ACMs in the structures identified for demolition or remodel on the approved plan set. Suspect materials that will be disturbed by the demolition activities shall be sampled and analyzed for asbestos content, or assumed to be asbestos containing. The survey shall be conducted by a person certified by Cal/OSHA pursuant to regulations implementing subdivision (b) of Section 9021.5 of the Labor Code, and shall have taken and passed an EPA-approved Building Inspector Course.

- a. If ACMs are found present, they shall be handled and remediated in compliance with the San Diego County Air Pollution Control District Rule 361.145 – Standard for Demolition and Renovation.

DOCUMENTATION: The applicant shall submit to the [DEH HAZ MAT, APCD] a signed, stamped statement from the person certified to complete the facility survey indicating that the survey has been completed and that either regulated asbestos is present or absent. If regulated asbestos is present, the letter shall describe the procedures taken to remediate the hazard and certify that they have been remediated pursuant to code sections referenced above. **TIMING:** Prior building permit, the applicant shall comply with this condition. **MONITORING:** The [DEH HAZ MAT, APCD] shall review the report and any additional evidence for compliance with this condition. The [PDS, PCC] shall review the completed and stamped report and any additional evidence for compliance with this condition.

HAZ #3–STRUCTURE REMOVAL [PDS, FEE]

INTENT: In order to comply with the proposed project design for the Cottonwood Sand Mine Major Use Permit, PDS20xx-MUP-xx-xxx, the structures identified on the approved Major Use Permit set shall be demolished. **DESCRIPTION OF REQUIREMENT:** The structures, as shown on the approved plan set, shall be removed or demolished. A Demolition Permit shall be obtained from [PDS, BD]. Compliance with conditions HAZ #XX and HAZ #XX to determine the presence or absence of Lead Containing Materials and Asbestos Containing Materials shall be completed before the County can issue a Demolition Permit. **DOCUMENTATION:** The applicant shall submit to the [PDS, PCC] a signed stamped statement from a registered professional; Engineer, Surveyor, Contractor, which states, that the structures have been removed or demolished. The letter report shall also include before and after pictures of the area and structure. **TIMING:** Prior building permit, the applicant shall comply with this condition. **MONITORING:** The [PDS, PCC] shall review the statement and, photos, and any additional evidence for compliance with this condition.

ATTACHMENT M

SCOPE FOR GROUNDWATER RESOURCES

Project Information: In review of the project description, groundwater is proposed for continuing to irrigate an existing golf course and for various uses associated with a proposed sand mining operation. In order to evaluate the scope of groundwater investigation required, we are requesting additional detailed information regarding past and proposed water demand.

Water Demand

1. Past Groundwater Use: The project description indicates past water demand has been 702 acre-feet per year based on pump ratings and irrigation schedules for irrigating two golf courses. Provide detailed backup information for County staff to verify historic water use amount.
2. Proposed Groundwater Use: The project description needs to quantify all anticipated groundwater extraction per mining phase with detailed backup information to justify each category of anticipated quantity. It should include a table with each water demand itemized, the total water demand for each phase, and backup information regarding how each number was quantified. This includes all proposed uses including:
 - Ongoing golf course irrigation
 - Proposed groundwater use required for each mining phase and reclamation (aggregate washing, water for dust control, landscaping, revegetation, etc.).
 - Potential groundwater losses (evaporative losses from exposing groundwater table, wash ponds, and evapotranspiration proposed riparian habitat as part of revegetation efforts) by each mining phase and ongoing losses at reclamation intended use.
3. Indicate which wells will be providing groundwater for the project.

Sweetwater Authority Concerns of Altering the Sweetwater River Channel: Excavation is proposed to occur in the Sweetwater River stream channel that is used to transfer water from Loveland Reservoir to Sweetwater Reservoir under the supervision of Sweetwater Authority. The Sweetwater Authority issued a letter to PDS dated December 13, 2018 with initial concerns of potentially impacting their ability to continue to transfer the water between reservoirs and potential water quality impacts from the proposal. It is recommended to review the concerns within their letter, and to schedule a meeting with the Sweetwater Authority. Appropriate County staff will be available for the meeting.

Potable Water Use: It is anticipated that potable water will be required for the mining site during operations. Please indicate where you intend on obtaining potable water. If proposed from Otay Water District, please include a will serve letter from the District.

Well Destruction Permit: Planning and Development Services (PDS) has determined that the project site will require a Well Destruction Permit for any wells not be used as part of this project. To apply for a well destruction permit, please contact the Department of Environmental Health (DEH) Land and Water Quality Division at (858) 565-5173. DEH can also provide the current fee that is required to be collected for the permit. The permit must be obtained by a C57 Licensed Contractor who is listed on the DEH approved Well Driller's List

at: <https://www.sandiegocounty.gov/content/dam/sdc/deh/lwqd/Well%20Drillers%20List%201-10-17.pdf>

A formal letter from the DEH must be submitted to PDS identifying either that the permit has been approved or is in the process of approval. In addition, prior to the approval of any grading, improvement plans or prior to the recordation of the Final Map, whichever comes first, proof of completion of the well destruction will be conditioned within this permit.

The [Memorandum of Understanding](#) must be executed by the applicant and consultant and subsequently submitted with the first iteration review.

ATTACHMENT N
SCOPE FOR MINERAL RESOURCES

Portions of the land within the project site have been classified as MRZ-2 and MRZ-3, and are underlain by alluvium. Based on the site's geologic environment, the mineral resources that are not mined as part of this project may be of value to the region and the residents of the state.

To evaluate if the project will result in the permanent loss of availability of a known mineral resource, and whether the loss would be considered significant under CEQA, a mineral resources report is required. The report shall be prepared using the County's approved Guidelines for Determining Significance and Report Format and Content Requirements for Mineral Resources which can be found on the World Wide Web at http://www.sdcounty.ca.gov/PDS/docs/Mineral_Resources_Guidelines.pdf (Guidelines) and http://www.sdcounty.ca.gov/PDS/docs/Mineral_Resources_Report_Formats.pdf (Report Formats).

The [Memorandum of Understanding](#) must be executed by the applicant and consultant and subsequently submitted with the first iteration review.

Please contact Leanne Crow, Hydrogeologist, at 858-495-5514 if you have any questions regarding these comments.

ATTACHMENT O

SCOPE FOR NOISE ANALYSIS

Project Specific Information:

The project consists of a Major Use Permit for the Cottonwood Sand Mining. It proposes to perform a sand mining operation located in what is currently being used as an 18-hole golf course. The surrounding properties include noise-sensitive land uses and sensitive habitat. The project is expected to be completed within four phases over an extended period. Reclamation would follow upon completion of mining operations. The proposed project would produce 4.8 million cubic yards (5.8-million tons) of mineral resources and would have a maximum production limit of 785,000-tons (523,000 cubic yards) of construction grade aggregate per calendar year. As mining is completed in phases, the site will be progressively reclaimed and restored. The combined mineral extraction and reclamation project will affect approximately 250 acres of 280 acres in the Jamacha Valley. Both temporary construction equipment operations to grade and prep the site along with on-going mining operations must be assessed to demonstrate Noise Ordinance compliance and General Plan Noise Element conformance. The proposed mining operation is subject to the one-hour average 75 dBA property line requirement pursuant to the County Noise Ordinance, Section 36.404. Combined noise levels from the mining/extractive uses and additional truck traffic has a potential to expose off-site existing residences to direct and cumulative noise impacts.

In addition, the proposed hours of operation of 4:00 am to 6:30 am potentially poses as a Major Project Issue for this project. The Noise Element of the County of San Diego General Plan establishes limitations on sound levels to be received by noise sensitive land uses (NSLU). The County's Noise Element of the General Plan, Policy 5.2, states, "Locate noise-generating industrial facilities at the maximum practical distance from residential zones. Use setbacks between noise-generating equipment and noise-sensitive uses and limit the operation of noise-generating activities to daytime hours as appropriate where such activities may affect residential uses. Furthermore, it was noted in the original decision dated October 6, 1983, that the on-site operations are limited to Monday to Friday from 8:00 am to 4:00pm, except emergency situations.

Based on the above information, an acoustical (noise) study for this project is required. The noise study must evaluate mining operations consisting of (but not limited to) loaders, haul trucks, graders, excavators, aggregate processing plant operations, and any other substantial on-site exterior noise generators on-site. These sources and any operations conducted during the weekend and outside daytime hours must demonstrate they comply with the sound level limits of the County Noise Ordinance Sections 36.404, 408, 409, and 410. All noise producing sources and operation activities should also demonstrate that they comply with the Noise Element noise standards.

The analysis shall follow the County's Guidelines for Determining Significance for Noise available online at <http://www.sdcountry.ca.gov/PDS/docs/Noise-Guidelines.pdf> and the Report Format and Content Requirements for noise available online at <http://www.sdcountry.ca.gov/PDS/docs/Noise-Report-Format.pdf>.




Noise Element:

Noise exposure criteria are incorporated into land use planning to reduce future conflicts between noise and land use. This is achieved by specifying acceptable noise exposure ranges for various land uses throughout the County. The County uses the Noise Compatibility Guidelines listed in Table N-1 (Noise Compatibility Guidelines) to determine the compatibility of land use when evaluating proposed development projects.

The Noise Compatibility Guidelines indicate ranges of compatibility and are intended to be flexible enough to apply to a range of projects and environments. For example, a commercial project would be evaluated differently than a residential project in a rural area or a mixed-use project in a more densely developed area of the County.

A land use located in an area identified as “acceptable” indicates that standard construction methods would attenuate exterior noise to an acceptable indoor noise level and that people can carry out outdoor activities with minimal noise interference. Land uses that fall into the “conditionally acceptable” noise environment should have an acoustical study that considers the type of noise source, the sensitivity of the noise receptor, and the degree to which the noise source may interfere with sleep, speech, or other activities characteristic of the land use. For land uses indicated as “conditionally acceptable,” structures must be able to attenuate the exterior noise to the indoor noise level as indicated in the Noise Standards listed in Table N-2 (Noise Standards). For land uses where the exterior noise levels fall within the “unacceptable” range, new construction generally should not be undertaken. Please see the following tables below.

Table2 N-1 within the County Noise Element:

Table N-1 Noise Compatibility Guidelines								
Land Use Category		Exterior Noise Level (CNEL)						
			55	60	65	70	75	80
A	Residential—single family residences, mobile homes, senior housing, convalescent homes							
B	Residential—multi-family residences, mixed-use (commercial/residential)							
C	Transient lodging—motels, hotels, resorts							
D*	Schools, churches, hospitals, nursing homes, child care facilities							
E*	Passive recreational parks, nature preserves, contemplative spaces, cemeteries							
F*	Active parks, golf courses, athletic fields, outdoor spectator sports, water recreation							
G*	Office/professional, government, medical/dental, commercial, retail, laboratories							
H*	Industrial, manufacturing, utilities, agriculture, mining, stables, ranching, warehouse, maintenance/repair							
	ACCEPTABLE—Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal construction, without any special noise insulation requirements.							
	CONDITIONALLY ACCEPTABLE—New construction or development should be undertaken only after a detailed noise analysis is conducted to determine if noise reduction measures are necessary to achieve acceptable levels for land use. Criteria for determining exterior and interior noise levels are listed in Table N-2, Noise Standards. If a project cannot mitigate noise to a level deemed Acceptable, the appropriate county decision-maker must determine that mitigation has been provided to the greatest extent practicable or that extraordinary circumstances exist.							
	UNACCEPTABLE—New construction or development shall not be undertaken.							

* Denotes facilities used for part of the day; therefore, an hourly standard would be used rather than CNEL (refer to Table N-2).

Note: For projects located within an Airport Influence Area of an adopted Airport Land Use Compatibility Plan (ALUCP), additional Noise Compatibility Criteria restrictions may apply as specified in the ALUCP.

Excerpts from Table N-2 within the County Noise Element

1. The exterior noise level (as defined in Item 3) standard for Category A shall be 60 CNEL, and the interior noise level standard for indoor habitable rooms shall be 45 CNEL.
2. The exterior noise level standard for Categories B and C shall be 65 CNEL, and the interior noise level standard for indoor habitable rooms shall be 45 CNEL.

3. The exterior noise level standard for Categories D and G shall be 65 CNEL and the interior noise level standard shall be 50 dBA Leq (one hour average).
4. For single-family detached dwelling units, "exterior noise level" is defined as the noise level measured at an outdoor living area which adjoins and is on the same lot as the dwelling, and which contains at least the following minimum net lot area:
 - (i) for lots less than 4,000 square feet in area, the exterior area shall include 400 square feet,
 - (ii) for lots between 4,000 square feet to 10 acres in area, the exterior area shall include 10 percent of the lot area;
 - (iii) for lots over 10 acres in area, the exterior area shall include 1 acre.
5. For all other residential land uses, "exterior noise level" is defined as noise measured at exterior areas which are provided for private or group usable open space purposes. "Private Usable Open Space" is defined as usable open space intended for use of occupants of one dwelling unit, normally including yards, decks, and balconies. When the noise limit for Private Usable Open Space cannot be met, then a Group Usable Open Space that meets the exterior noise level standard shall be provided. "Group Usable Open Space" is defined as usable open space intended for common use by occupants of a development, either privately owned and maintained or dedicated to a public agency, normally including swimming pools, recreation courts, patios, open landscaped areas, and greenbelts with pedestrian walkways and equestrian and bicycle trails, but not including off-street parking and loading areas or driveways.
6. For non-residential noise sensitive land uses, exterior noise level is defined as noise measured at the exterior area provided for public use.
7. For noise sensitive land uses where people normally do not sleep at night, the exterior and interior noise standard may be measured using either CNEL or the one-hour average noise level determined at the loudest hour during the period when the facility is normally occupied.
8. The exterior noise standard does not apply for land uses where no exterior use area is proposed or necessary, such as a library.
9. For Categories E and F the exterior noise level standard shall not exceed the limit defined as "Acceptable" in Table N-1 or an equivalent one-hour noise standard.

Note: Exterior Noise Level compatibility guidelines for Land Use Categories A-H are identified in Table N-1, Noise Compatibility Guidelines.

In addition, the County has adopted community noise control standards as part of the County's Noise Abatement and Control Ordinance (County Code of Regulatory Ordinances, Title 3, Division 6, Chapter 4) and provides guidance for implementation of the County's noise policies and ordinance in the County's *California Environmental Quality Act* (CEQA) Guidelines for Determining Significance for Noise. The Noise Ordinance defines limits for activities that generate excessive noise and sets noise level limits for land uses. The County's CEQA significance guidelines provide guidance on the use of the General Plan Noise Element and the County Noise Abatement and Control Ordinance when considering the environmental impact of noise exposure to high or excessive noise levels.

According to the Guidelines For Determining Significance, project implementation will result in the exposure of any on-site or off-site, existing or reasonably foreseeable future NLSU to exterior or interior noise (including noise generated from the project, together with noise from roads [existing and planned Circulation Element roadways], railroads, airports, heliports and all other noise sources) in excess of any of the following:

A. Exterior Locations:

- i. 60 dB (CNEL)²; or
- ii. An increase of 10 dB (CNEL) over pre-existing noise.

In the case of single-family residential detached NSLUs, exterior noise shall be measured at an outdoor living area which adjoins and is on the same lot as the dwelling, and which contains at least the following minimum area:

1. (i) for lots less than 4,000 square feet in area, the exterior area shall include 400 square feet,
2. (ii) for lots between 4,000 square feet to 10 acres in area, the exterior area shall include 10 percent of the lot area;
3. (iii) for lots over 10 acres in area, the exterior area shall include 1 acre.

Noise Ordinances:

A preliminary review of the project information provided indicates that there is insufficient information to determine whether permanent equipment and operations on-site will exceed sound level limits of the San Diego County Noise Ordinance (Section 36.404). The County Noise Ordinance does not permit noise levels that impact adjoining properties or exceed County Noise Standards. The project site would operate as a mine and is subject to an operational noise level of 75 dBA at the project property lines. In order for the Department to make a determination on the project's conformance with County noise standards, the applicant must demonstrate that the hourly average sound levels do not exceed this threshold at the property line, as the most stringent Ordinance condition for the project.

The one-hour average sound level limit applicable to extractive industries, however, including but not limited to borrow pits and mines, shall be 75 decibels at the property line regardless of the zone in which the extractive industry is located.

A preliminary review of the project information provided indicates that there is insufficient information to determine whether temporary construction equipment and operations on-site will exceed sound level limits of the San Diego County Noise Ordinance (Sections 36.408 and 36.409):

Section 36.408

Except for emergency work, it shall be unlawful for any person to operate or cause to be operated, construction equipment:

- (a) Between 7 p.m. and 7 a.m.
- (b) On a Sunday or a holiday. For purposes of this section, a holiday means January 1st, the last Monday in May, July 4th, the first Monday in September, December 25th and any day appointed by the President as a special national holiday or the Governor of the State as a special State holiday. A person may, however, operate construction equipment on a Sunday or holiday between the hours of 10 a.m. and 5 p.m. at the person's residence or for the purpose of constructing a residence for himself or herself, provided that the operation of construction equipment is not carried out for financial consideration or other consideration of any kind and does not violate the limitations in sections 36.409 and 36.410.

Section 36.409

- Except for emergency work, it shall be unlawful for any person to operate construction equipment or cause construction equipment to be operated, that exceeds an average sound level of 75 decibels for an eight-hour period, between 7 a.m. and 7 p.m., when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is being received. Amended by Ord. No. 9962 (N.S.), effective 1-9-09.

Section 36.410

A preliminary review of the project information provided indicates that there is insufficient information to determine whether impulsive construction equipment operations on-site will exceed sound level limits of the San Diego County Noise Ordinance):

- (a) Except for emergency work or work on a public road project, no person shall produce or cause to be produced an impulsive noise that exceeds the maximum sound level shown in [Table 36.410A](#), when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is received, for 25 percent of the minutes in the measurement period, as described in subsection (c) below. The maximum sound level depends on the use being made of the occupied property. The uses in [Table 36.410A](#) are as described in the County Zoning Ordinance.

**TABLE 36.410A.
MAXIMUM SOUND LEVEL (IMPULSIVE) MEASURED AT OCCUPIED PROPERTY IN
DECIBELS (dBA)**

OCCUPIED PROPERTY USE	DECIBELS (dBA)
Residential, village zoning or civic use	82
Agricultural, commercial or industrial use	85

- (b) Except for emergency work, no person working on a public road project shall produce or cause to be produced an impulsive noise that exceeds the maximum sound level shown in [Table 36.410B](#), when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is received, for 25 percent of the minutes in the measurement period, as described in subsection (c) below. The maximum sound level depends on the use being made of the occupied property. The uses in [Table 36.410B](#) are as described in the County Zoning Ordinance.

TABLE 36.410B
MAXIMUM SOUND LEVEL (IMPULSIVE) MEASURED AT OCCUPIED PROPERTY IN
DECIBELS (dBA) FOR PUBLIC ROAD PROJECTS

OCCUPIED PROPERTY USE	dB(A)
Residential, village zoning or civic use	85
Agricultural, commercial or industrial use	90

- (c) The minimum measurement period for any measurements conducted under this section shall be one hour. During the measurement period a measurement shall be conducted every minute from a fixed location on an occupied property. The measurements shall measure the maximum sound level during each minute of the measurement period. If the sound level caused by construction equipment or the producer of the impulsive noise exceeds the maximum sound level for any portion of any minute, it will be deemed that the maximum sound level was exceeded during that minute.

(Added by Ord. No. 9962 (N.S.), effective 1-9-09)

To determine conformance to the County Noise Ordinance, a noise study is required and it is essential that this component of this analysis include the following information:

Permanent Noise Sources:

- (1). Manufacturers Spec Sheet and/or field measurements for all noise producing equipment on-site that identifies the ARI standard and/or decibel (dBA) per range. It is important to note that all noise producing sources must be included.
- (2). Field measurements and/or noise source data for all noise producing operations and activities on-site that identifies a decibel (dBA) per range. It is important to note that all noise producing sources must be included.

- (3). Inclusion of plans that identify the site location of all noise sources in relation to property lines. Discuss the worst-case noise source to property line distances (in feet). It is essential to address all potential noise sources on-site and to include a discussion related to openings within all surrounding walls or fences, such as driveways, fencing and gates.
- (4). Include a detailed noise analysis of operational noise for each option that is currently under consideration.
- (5). Include a noise analysis of project-generated traffic assuming the expected breakdown of automobiles, medium, and heavy trucks.
- (6). Hours of operation and activity level at each hour.
- (7). Demonstrate that the proposed on-going mining operations and activities would comply with the property line sound level limits per County noise standards.
- (8). Include any recommended design features and mitigation measures if required to demonstrate compliance with the County Noise Ordinance, Section 36.404.
- (9). In addition to #6 above, include an analysis of the original decisions dated October 6, 1983, which specifies the limitations on the hours of operations of Monday to Friday from 8:00 am to 4:00pm (except emergency situations). Explain what type of activities were occurring within those timeframe.

Temporary Construction Equipment Operations (Site Preparation that is Not Related to the Daily Mining Operations :

- (9). Manufacturers Spec Sheet and/or field measurements for all construction equipment that identifies a decibel (dBA) per range. It is important to note that all noise producing sources must be included.
- (10). Additional plot plans that identifies the site location of all construction equipment noise sources in relation to property lines. It is essential to address all potential construction equipment noise sources on-site.
- (11). Identify all existing occupied property/structures adjacent to the boundary of the project site.
- (12). Include the schedule of the grading activities, phasing and preparation of the project site.
- (13). Include a detailed noise analysis of construction noise for each option that is currently under consideration.
- (15). Address construction noise impacts to potential nearby noise-sensitive habitats and species.

- (14). Include a noise analysis of project-generated construction traffic assuming the expected breakdown of automobiles, medium, and heavy trucks.
- (15). Address the associated cut and fill of materials, and specify whether the operations of general construction equipment and/or impulsive construction equipment are proposed (e.g. drill rigs, rock crushers, hoe rams, etc).
- (16). Include any recommended design features and/or temporary construction/demolition mitigation measures if required to demonstrate compliance with County Noise Ordinance, Section 36.409.

General information: A noise analysis is needed to determine whether or not noise levels exceed San Diego County standards. Noise analysis shall occur when the project is adjacent to heavily traveled roads, railroad tracks, airports, or heavy industrial operations. Noise analysis may also be required for a project that generate high levels of noise either through activities directly associated with the proposal or major increases in traffic generated by the proposal (direct and cumulative impacts).

If the noise impacts are associated with traffic movements, airports, or other transportation activities, a noise analysis shall utilize field measurements and projected transportation noise levels to determine the potential for impacts to present and future residents of the project. The noise analysis must conform to the Noise Element of the San Diego County General Plan.

If the noise impacts are associated with activities on the site, such as rock crushing or some other proposed activity, the noise analysis shall include estimates of noise generation potential from the site utilizing measurements from similar activities that are already in existence. The noise analysis must conform to the San Diego County Noise Ordinance.

The Memorandum of Understanding must be executed by the applicant and consultant and subsequently submitted with the first iteration review.

ATTACHMENT P
SCOPE FOR GREENHOUSE GAS ANALYSIS

Project Specific Information: The proposed project has the potential to result in substantial greenhouse gas (GHG) emissions from mining and reclamation activities. Therefore, the project is required to discuss the potential impacts to global climate change and complete a Greenhouse Gas Analysis Report (Report).

At this time, the County does not have enough information to properly assess alternative options for processing and shipping materials. Thus, the Report should focus on the proposed project. As more information becomes available, the County may ask for additional analysis to be conducted for these other project options.

General Information: Based on the potential impacts the project may have on global climate change, a GHG analysis is required.

The County has adopted a Climate Action Plan (CAP) that outlines measures to reduce GHG emissions. Because of the unique nature of the project, CAP measures may not be applicable to the project. Therefore, the applicant should consult with County staff to determine the appropriate threshold for the project and if further analysis and identification of project design features or potential mitigation measures is required.

Due to the unique nature of the proposed project, construction and operational activities may not be distinctly different, and thus, may not need to be discussed separately. Therefore, the Report should focus on identifying all potential impacts associated with project activities over the proposed 12-year period of mining and reclamation activities. If there are site preparation or construction activities anticipated at initiation of the project, those should be analyzed as well.

Emissions of pollutants of concern from the proposed project may occur from mining and reclamation activities. In general, GHG emissions would result from onsite and offsite vehicle use (e.g., on-road, off-road). Additionally, emissions associated with transport of necessary materials, including waste export, water import, or any other traffic associated with activities, must be included in the analysis. Onsite energy requirements including administration buildings, lighting, and water use shall be quantified. The project includes a reclamation phase that would result in additional vegetation. GHG benefits may be evaluated from any increases in vegetation, while also considering losses from removal of vegetation.

The following issues should be addressed as part of the GHG analysis:

1. Would the proposed project generate GHG emissions that could contribute substantially to global climate change?
2. Would implementation of the proposed project interfere with the GHG reduction goals in California (e.g., Assembly Bill 32, Senate Bill 32)?

Mitigation measures shall be included to reduce any identified potentially significant impacts. The Report shall also include a discussion of the level of mitigation achieved by the proposed mitigation, including quantification or substantial evidence where appropriate, to show how mitigation reduces identified impacts.

DEPARTMENT OF TRANSPORTATION

DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
PHONE (619) 688-6960
FAX (619) 688-4299
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

December 10, 2018

11-SD-54

PM 11.84

Cottonwood Sand Mining Project
Major Use Permit # PDS2018-MPA-18-023

Mr. Bronwyn Brown, Project Manager
San Diego County Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Dear Mr. Brown:

Thank you for including the California Department of Transportation (Caltrans) in the review process on the Major Use Permit Application for the Cottonwood Sand Mining Project located in Rancho San Diego near State Route 54 (SR-54) in the unincorporated area of San Diego County. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

Traffic Impact Study

- A traffic impact study (TIS) is necessary to determine this proposed project's near-term and long-term impacts to the State facilities – existing and proposed – and to propose appropriate mitigation measures.
- The geographic area examined in the TIS should also include, at a minimum, all regionally significant arterial system segments and intersections, including State highway facilities where the project will add over 100 peak hour trips. State highway facilities that are experiencing noticeable delays should be analyzed in the scope of the traffic study for projects that add 50 to 100 peak hour trips.
- The data used in the TIS should not be more than 2 years old.
- Please provide Synchro Version 10 files.

Mr. Bronwyn Brown
December 10, 2018
Page 2

- Early coordination is recommended.

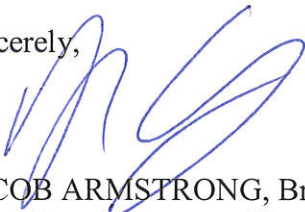
Hauling

Caltrans may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code. The Caltrans Transportation Permits Issuance Branch is responsible for the issuance of these special transportation permits for oversize/overweight vehicles on the State Highway System.

Please contact the Caltrans Transportation Permits Issuance Branch, Sacramento, CA (916) 322-1297. Additional information is provided online at:
<http://www.dot.ca.gov/trafficops/permits/index.html>

If you have any questions, please contact Mark McCumsey at (619) 688-6802 or by email at mark.mccumsey@dot.ca.gov

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Armstrong', is written over the word 'Sincerely,'.

JACOB ARMSTRONG, Branch Chief
Local Development and Intergovernmental Review Branch



SWEETWATER AUTHORITY

505 GARRETT AVENUE
POST OFFICE BOX 2328
CHULA VISTA, CALIFORNIA 91912-2328
(619) 420-1413
FAX (619) 425-7469
<http://www.sweetwater.org>

GOVERNING BOARD

RON MORRISON, VICE CHAIR
JOSIE CALDERON-SCOTT
STEVE CASTANEDA
JOSÉ F. CERDA
HECTOR MARTINEZ
JOSE PRECIADO
JESS VAN DEVENTER

December 13, 2018

TISH BERGE
GENERAL MANAGER

JENNIFER H. SABINE
ASSISTANT GENERAL MANAGER

Ms. Bronwyn Brown
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, CA, 92123

Subject: Initial Comments related to the Cottonwood Sand Mine Project
PDS2018-MPA-18-004
SWA File: (Dev) Cottonwood Sand Mining

Dear Ms. Brown:

Thank you for providing a copy of the letter sent to New West Investment, Inc., the proponent of the Cottonwood Sand Mine Project (Project). The letter provides a summary of the major issues discussed at a pre-application meeting between County of San Diego (County) staff and the Project Proponent. In addition to the letter you provided, EnviroMINE Inc. provided Sweetwater Authority (Authority) staff with a copy of the Project Description, dated November 2018, and also presented the Project to Sweetwater Authority's Operation Committee on December 5, 2018.

The Authority is a public water agency serving approximately 200,000 people residing in National City, the western and central portions of Chula Vista, and the unincorporated communities of Bonita and Lincoln Acres. The Authority's mission is *"to provide its current and future customers with a safe and reliable water supply through the use of the best available technology, sound management practices, public participation and a balanced approach to human and environmental needs."* With the Authority's mission statement in mind, Authority staff has conducted an initial review of materials provided and offers these initial comments and information. Please note that none of the comments provided in this letter should be construed as support of the Authority for the Project.

BACKGROUND

The Authority owns and manages Sweetwater Reservoir and Loveland Reservoir. Sweetwater Reservoir is a 28,079 acre foot reservoir with a surface area of approximately 978 acres when filled to capacity. Sweetwater Reservoir is a terminal reservoir located less than three miles downstream of the Project location. Major facilities located at or adjacent to Sweetwater Reservoir include the Robert A. Perdue Water Treatment Plant (Perdue WTP), Sweetwater Dam, the Sweetwater Reservoir Urban Runoff Diversion System (URDS), and aqueducts owned and operated by the San Diego County Water Authority.

*A Public Water Agency
Serving National City, Chula Vista and Surrounding Areas*

Ms. Bronwyn Brown

Re: Initial Comments Related to the Cottonwood Sand Mine Project

December 13, 2018

Page 2 of 7

Loveland Reservoir is located near Alpine and upstream of the Project. Runoff from the upper Sweetwater River watershed is captured at Loveland Reservoir, primarily during winter and spring months. Runoff stored at Loveland Reservoir can be stored or transferred to Sweetwater Reservoir via the Sweetwater River channel to augment water production for the Authority's service area. Both Loveland Reservoir and Sweetwater Reservoir are a vital part of the San Diego region's drinking water supply.

The Authority has demonstrated its commitment to protecting the Sweetwater River watershed through a series of resolutions and actions. On May 23, 1984, the Authority's Governing Board adopted *Resolution 84-8*, which was later amended on April 27, 1988. In summary, *Resolution 84-8 As Amended* explains how development in the middle Sweetwater River watershed was becoming a threat to water quality in Sweetwater Reservoir and requires that developers and landowners developing lands within a portion of the middle Sweetwater River watershed pay a fee to reimburse a percentage of the cost associated with the construction of the URDS facilities (*the URDS facilities allow for the capture of polluted urban runoff, physical and biological pollutant removal from captured runoff in detention ponds, and full diversion of urban runoff, as needed*). On July 14, 1993, the Authority's Governing Board adopted a second resolution (*Resolution 93-8*) directing Authority staff to pursue means to protect the middle and upper portions of the Sweetwater River watershed since these watershed lands provide the runoff that is ultimately treated at the Perdue WTP and delivered to thousands of people in the Authority's service area. As result of these resolutions, the Authority implements a multi-barrier approach to protect water quality in the Sweetwater River watershed and its water sources, which includes monitoring of development, land use changes, and other possible contaminant activities occurring upstream of the Authority's surface water reservoirs.

INITIAL CONCERNS

The Authority is concerned about this Project and potential impacts to Sweetwater Reservoir as this Project proposes a variety of activities that could significantly increase pollution of the Sweetwater Reservoir. The Authority's concerns include:

A. Water Transfers

1. The Authority has senior water rights along the Sweetwater River. These water rights were acquired by the Authority through its predecessors. Among other things, these water rights allow the Authority to transfer water from Loveland Reservoir to Sweetwater Reservoir along the Sweetwater River channel. The Project might impact the Authority's ability to transfer water from Loveland Reservoir to Sweetwater Reservoir and the ability for any runoff to travel

Ms. Bronwyn Brown

Re: Initial Comments Related to the Cottonwood Sand Mine Project

December 13, 2018

Page 3 of 7

downstream along the river to Sweetwater Reservoir. The Project Description does not acknowledge the water transfers anywhere. Similarly, it does not propose any type of coordination or agreement with the Authority. The Authority would like to know, in writing, what the intentions of the Project Proponent are in regards to the currently periodic water transfers.

2. The Project proposes to widen the riverbed to a width of approximately 250 – 300 feet while maintaining the existing channel elevations. A wider riverbed would likely slow down the flow of water being transferred from Loveland Reservoir to Sweetwater Reservoir, and the increased surface area in the riverbed would likely allow for more water losses, adversely affecting the Authority and its customers. The Authority would like to request different alternatives to the final design of the Sweetwater River channel at the Project location.
3. Restoring streambeds and riverbeds is an expensive and challenging task. Before Project approval, the Authority requests that a restoration plan is developed and financial securities are in place to ensure that full restoration of the site occurs. Any on-site revegetation should not be dependent on runoff stored at Loveland Reservoir or water being transferred.
4. The Project proposes a conveyor belt to transport excavated soils to a processing plant on site. Sections of the conveyor belt are proposed to be within the Sweetwater River. It is not explained if sections of the conveyor belt will be moved temporarily when the river is flowing or when the Authority transfers water.
5. The Project proposes to use water from existing on-site groundwater wells and then abandon those wells after Project completion. The Authority currently uses one of those wells for monitoring groundwater levels and it is in the Authority's interest to keep that monitoring well operational.
6. Water transfers should be considered a factor in any Drainage Analysis or other hydrology studies.

B. Potential for Pollution at Sweetwater Reservoir

1. The California Drinking Water Source Assessment and Protection (DWSAP) Program classifies mining operations as a very high risk possible contaminating activity (PCA). Very high PCAs have the highest potential for contaminating drinking water sources, such as Sweetwater Reservoir. In order to complete a vulnerability analysis, the Authority requests the following information:

Ms. Bronwyn Brown

Re: Initial Comments Related to the Cottonwood Sand Mine Project

December 13, 2018

Page 4 of 7

- A list of substances and materials (“pollutants of concerns”) that are proposed to be used as part of the Project that have the potential to pollute soils, waterways, groundwater, and the Sweetwater Reservoir. Impacts from pollutants of concern should also be analyzed as part of the Project’s environmental review. Furthermore, the Authority requests that a pollutant load analysis be conducted as part of the environmental review process to better understand the potential impacts to water quality.
 - A PDF copy of the Plot Plan; Conceptual Landscape Plan; Resource Protection Study; Reclamation Plan; Full Biological Resources Report/Study; Conceptual Resource Management Plan; Additional Hazards Information; Drainage/Flooding Analysis; Additional Detailed Water Demand; Geologic/Geotechnical Report; and Stormwater Management Plan.
2. The Authority understands that compliance with existing water pollution control regulations will be required for the Project in the form of implementation of a Stormwater Management Plan (SWMP) or similar compliance documentation. Reviewers of the draft SWMP should consider the following information:
- A terminal drinking water reservoir that serves a population of approximately 200,000 people is located less than three miles downstream of the Project.
 - While implementation of erosion and sediment control measures may help mitigate, to an extent, impacts to the Sweetwater River and the downstream reservoir, mismanagement of the mine, lack of BMP maintenance, or “an act of God” could result in significant pollution and siltation of Sweetwater Reservoir.
 - Water transfers from Loveland Reservoir to Sweetwater Reservoir may be an event that can be coordinated between the Authority and the Project Proponent. Other events, such as atmospheric rivers or Loveland Reservoir “spills,” cannot be controlled and may result in significant river flows that could flood the proposed mining site and result in pollution and siltation of Sweetwater Reservoir.
 - The Project includes habitat restoration in mined sites within the floodplain. Major erosion of recently restored sites located within the floodplain may occur during water transfers or significant storm events. It

Ms. Bronwyn Brown

Re: Initial Comments Related to the Cottonwood Sand Mine Project

December 13, 2018

Page 5 of 7

would be appropriate to know what solution the Project Proponent is suggesting to prevent this from happening, and if the suggested solution is feasible.

- The Project Description mentions that areas disturbed by the mining operations will be progressively reclaimed two years after the start of mining. Reclamation will consist of grading and revegetation. The Project Description, however, does not describe what type of erosion and sediment control measures will be implemented in disturbed areas during the two-year gap before reclamation begins.
 - The Project proposes import of inert fill and wash fines ("fill") to be used as backfill in areas parallel to the river channel. Fill could be washed away by river flows and result in siltation of Sweetwater Reservoir and impacts to water quality. Contaminated wash fines should not be reused or disposed of on site.
 - The Project includes many features with potential for contaminating the river and the Sweetwater Reservoir. These features include muck ponds, the conveyor belt, and settling ponds. BMPs that prevent contamination of both groundwater and surface waters should be implemented at all times.
3. Spillage from the conveyor belt could result in impacts to water quality and become a safety hazard as the conveyor belt shares the area under the Steele Canyon Rd. Bridge with the main river channel. A safer, better alternative should be analyzed; full avoidance of the area under the bridge is preferred.
 4. Any negative impacts to water quality resulting from this Project can result in the need for additional water treatment. Additional treatment could result in additional cost to the Authority and its customers.

C. Fee Collection

1. If this Project moves forward, the Authority requires that a condition be placed on the Project to require the owner to submit satisfactory evidence to the County stating that the owner has complied with *Resolution 84-8 As Amended*. The timing for condition compliance is prior to issuance of any building permit or other permit pursuant to a Major Use Permit. On May 8, 1985, the County Board of Supervisors took action to require the County to place conditions on development proposals within a designated area of the Sweetwater River Watershed to the satisfaction of the Authority, as provided in *Resolution 84-8*. Since the Board of

Ms. Bronwyn Brown
Re: Initial Comments Related to the Cottonwood Sand Mine Project
December 13, 2018
Page 6 of 7

Supervisors action, discretionary Project approvals within the designated watershed area have complied with this condition. The resolution provides for the collection of urban runoff protection fees from all developments within the lower Sweetwater Reservoir drainage basin to pay for a portion of the URDS.

D. Future Site Development

1. After sand mining operations are concluded, the Project proposes to establish pads for future residential development. It is recommended that alternative land uses for the site be considered, as housing in the river's vicinity may be hazardous and subject to flooding.

E. Distribution List

1. The Authority recommends the following public agencies be included in the distribution list as these other agencies may have concerns with this Project as well.
 - 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, Water Quality Programs
 - U.S. Bureau of Reclamation, Southern California Area Office
 - San Diego County Water Authority, Water Resources Department

Please continue to include the Authority on the County's distribution list for the subject Project as this letter only outlines initial concerns and it is by no means comprehensive. Additional correspondence will be provided as the Project progresses through the environmental and development review processes. If you have any questions, do not hesitate to contact Israel Marquez at 619-409-6759 or imarquez@sweetater.org. The Authority values its relationship with the County and the high level of coordination that exists between County staff and Authority staff.

Sincerely,

SWEETWATER AUTHORITY



Jennifer H. Sabine
Assistant General Manager

Ms. Bronwyn Brown

Re: Initial Comments Related to the Cottonwood Sand Mine Project

December 13, 2018

Page 7 of 7

RM:IM:vn

cc: Ron R. Mosher, Sweetwater Authority
Israel Marquez, Sweetwater Authority
Cindy Pino, Sweetwater Authority