

September 11, 2015

El Monte Sand Mining and Nature Preserve

PDS2015-MUP-98-014W2, PDS2015-RP-15-001, LOG NO. PDS2015-ER-98-14-016B

Comments on the Notice of Preparation

Submitted by
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The boundaries of the Major Use Permit as presented in the published project description are not accurate. A new project description is required and may require new public noticing.

An entirely new EIR is required for the El Monte Sand Mine. "The Project" for which a previous EIR was approved was a golf course, with no streambed disturbance and balanced cut and fill (no export). The proposed project is a sand mine. The impacts of the two projects are very different, the footprint (area) of the two projects is very different, and the environmental impacts outside of the project area are very different. There are fifteen subject areas identified with NEW OR SUBSTANTIALLY MORE SEVERE SIGNIFICANT ENVIRONMENTAL EFFECTS compared to the golf course project. CEQA Guidelines section 15162 does not apply to the project since "the project" is totally different, therefore a Subsequent EIR is not appropriate. The previous draft EIR was released for public review in September 1998 with the technical studies dated earlier. It is not valid to rely on outdated technical studies for the very significant and different impacts that will be generated by the sand mine, nor is simply updating technical studies for a different project with new significant impacts adequate.

Provide a detailed technical analysis of the hydrology of El Monte Valley. Will the sand mine change hydrology in the valley and impact down stream water tables and surface waters. For example, Lindo Lake is well dependent. How far does the ground water aquifer originating in El Monte Valley extend? How will water use during extraction effect the ground water level? How will evaporation affect the water table? Will fluctuations in the water table impact existing vegetation both upstream and downstream of the project site which are dependent on ground water.

Hanson Pond: Reclamation is planned and will be completed for the Hanson Pond. How will the project affect both short-term and long-term water levels in the pond? How will phase 4 sand mining adjacent to the restored area affect the new habitat, and both plant and animal species that will be present? Will sand mining adjacent to Hanson Pond continue during nesting season? Include in the discussion noise, dust, and ground vibration impacts. The river floodway is currently north of Hanson Pond. How will stormwater flows exit the phased extraction areas and be directed back into the river channel? Extraction in the past for Hanson Pond was required to provide separation between the extraction pond and the river channel. Will that be required for the proposed project? How will noise, dust, and ground vibration from the "plant site" affect the new habitat and species at Hanson Pond. Will it impact restoration efforts in any way?

Rock crushing/import of materials. Rock and concrete importation for crushing and recycling is a permitted use when an extractive MUP is approved. However, the project description states "No batch plants or rock crushing are proposed for the project." How will (or can) the MUP be conditioned that a permitted use is not permitted? Somewhere under the layers of sand there may be remains of previous channelization efforts (rock rip-rap). How will the

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project dispose of this material? Additional noise, dust, ground vibration impacts may occur if this use is permitted.

Drop structure effects on El Monte Valley hydrology. The proposed drop structure appears to be an underground dam structure across the floodplain. How will the drop structure affect the hydrology of the valley? Will there be effects on the water table and aquifer as the drop structure is gradually constructed? Is de-watering required? Where will water be moved to? What will be the effects if the drop structure fails during a 100-year flood event or when water spills from El Capitan Dam?

Loss of alluvial sand. Sand in El Monte Valley both stores and purifies stormwater entering the valley. How will removal of the sand affect water quality downstream? How will stormwater flows be affected with the loss of the retention effect of the sand?

Trails. Will the proposed trail easements along the north and south sides of the project area be constructed immediately or during the very early site preparation for Phase 1? How will the proposed trail easements connect to planned trails to the west around Hanson Pond? A north-south connection between the two road edge trails is needed at the east end of the extraction/reclamation area. This connection must be identified. If trails are not constructed during the beginning phase of the project, discuss impacts to the desired community character of the valley, impacts to existing businesses, and impacts to recreational uses in Lakeside.

Trails. Location of trails along the roadways does not contribute to enjoyment of the river environment. Additional trail easement alignments should be identified closer to the pond areas to be constructed as reclamation progresses. Blocking all public access to reclaimed areas of the project is not reasonable and will create impacts to recreation in the valley and to Lakeside businesses. The proponents claimed their trails would be similar to those in Walker Preserve in television interviews. It must be noted the Walker Preserve Trails are adjacent to the river channel, not set back along the roadways, on the outside of an eight foot high berm.

Project lifespan. Explain and clarify why there should be any expectation of the sand extraction phases to be completed in 15 years. There are numerous other sources of construction aggregate and sand in the Lakeside area as well as a new sand mine proposed for the north end of Moreno Valley (East County Sand Mine). Construction demand and potential for another economic downturn may definitely affect project timing. The project description on page 6 describes a prior project on the site and states "... a substantial reduction in the demand for PCC sand and the attendant value reduction, planning for this project was discontinued."

Valley Fever. The fungus causing Valley Fever, coccidioidomycosis, is endemic in El Monte Valley. Spores become airborne when the ground is disturbed. While watering of the ground may reduce dust creation, trucks carrying sand typically disperse dust as they travel at higher speeds on local roadways and the freeway. Discuss potential for valley fever exposure both in El Monte Valley and in the surrounding neighborhoods, and as sand is transported. Include evaluation of public health impacts to residents, to visitors to the valley who visit El Monte Park or El Capitan reservoir, and to users of the multi-purpose trail.

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Water Pollution. Will pollution from sand mining equipment impact ground water quality in this ground water dependent area? How will loss of sand filtration in the pit area impact water quality? A statement at the Scoping Meeting August 24th indicated only wells within a one-half mile of the project site would be evaluated. Please justify that limited area, since the entire aquifer may be affected.

Prime Agricultural Land. Discuss the loss of prime agricultural land to the sand mine and reclamation plan.

Site re-vegetation. Will the eastern end of the project in the area east of the extraction pit, be restored? What is planned for that end of the project area? Merely restoring the former golf course pond areas are not consistent with the project's stated objectives. Are "wash fines", material not suitable for sale, sustainable soil material for the re-vegetation? What is the composition of the project's "wash fines"?

Reclamation The reclamation and re-vegetation described in the project description are minimal at best, and substandard compared to existing river re-vegetation programs. A much more robust restoration plan must be prepared.

Restoration of previous non-permitted mining activity. The prior golf course project exported material without permits and failed to restore the mined area. Why is the Golf Course project not being required to restore the site of the non-permitted grading? Why is previous non-permitted activity being mitigated by an unrelated new application?

El Monte Road. Will the project construct improvements to El Monte Road? There is a definite need for road widening to improve bicycle safety. Discuss safety for pedestrians, equestrians and bicyclists in the area where trucks enter and exit the project site.

Noise/Air quality. Evaluate noise impacts both within the valley and to residences on the ridgelines above. When will equipment repair occur? Will there be evening noise impacts after extraction ends for a day? Where will trucks be staged? Calculate quantity of idling and exhaust emissions that will be released in the valley. Will local air quality be impacted? What noise impacts will occur to residences along local roadways due to the addition of heavy truck traffic? Include evaluation of increased noise on Lake Jennings Park Road as trucks go up the grade. Will trucks coming down the grade be permitted to use compression braking? What will be the impact of particulate emissions in the constrained area of El Monte Valley? Is a cumulative impact study required? What is the existing air quality in the valley relative to particulates? Modeling is not adequate to address this question. How big a fleet of vehicles is required for the mining operations? What is the expected turn-around time for a typical delivery?

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Air Quality and Greenhouse Gas Emissions

Show compliance with San Diego County Air Pollution District Rule 52 and Rule 55. Both rules apply to the proposed project.

Provide a local air quality assessment of the project's emissions, taking into consideration the topography of El Monte Valley.

Evaluate wind erosion of stockpiles under Santa Anna weather events and winter storm events as the valley's topography affects wind velocities.

Evaluate air quality impacts for both dust, particulates, and greenhouse gas emissions in the local haul routes through the Lakeside area.

Provide a cumulative impact analysis to air quality including construction projects and other existing uses (extractive, composting, agricultural, industrial) that contribute to local air quality in Lakeside.

The San Diego Air Pollution Control District must review the proposed project's Air Quality Assessment for completeness, accuracy, and compliance with all regional regulations.

The San Diego Air Pollution Control District must provide a health risk assessment for the proposed project and from cumulative air quality impacts.

Questions and Clarifications needed.

Project description, page 14, phase 1: " A slurry pipeline will be used to transport wash fines further east if needed.. " Does this mean wash fines will be dumped in the eastern portion of the major use project site, outside of the extraction area? When will this area reclaimed? Where will top soil and overburden be stored on the site?

The project description modifies the project name/description to the "El Monte Nature Preserve Mine". This is first and foremost an extraction project and the modified name obscures its nature. Consistency in the project name is required.

Possible Project alternatives:

1. No project alternative
2. Golf course alternative- approval already exists.
3. Restoration and re-vegetation of the project area without all the impacts associated with the proposed sand mine.