

**Cottonwood Sand Mine Project**  
**Appendix B – Land Use Consistency Analysis**

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
<b>Land Use Element</b>			
<p><b>LU-2.8: Mitigation of Development Impacts.</b>            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.</p>	<p>During the mining and reclamation phase, noise, vibrations, dust, odor, and aesthetic impairment would occur; however, as discussed further in Chapters 2.1 and 2.4 and Section 3.1.1 of this EIR, these impacts would either be less than significant (air quality) or would require mitigation measures (aesthetics and noise) to reduce potentially significant impacts to less-than-significant levels. Specific to health risks resulting from localized concentrations of DPM and respirable crystalline silica, modeling was completed, as shown in EIR Table 3.1.1-8. No impacts to community health were identified. Also, impacts to sensitive receptors from CO hotspots were less than significant. All Project direct noise would be less than significant, and the Project’s contribution to cumulative noise would be mitigated through sound barriers described in EIR Subchapter 2.4.</p> <p>Specific to aesthetic impairments that may be detrimental to human health and safety, such impacts have</p>	<p>Once all mining and reclamation activities are completed at the end of year 12, all mining equipment and related structures would have been removed and the Project site revegetated with native vegetation. Activities at the Project site would be limited to some public recreation along trails in portions of the site. These activities would not cause excessive noise, vibrations, dust, odor, aesthetic impairment or other detrimental impacts to human health and safety.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
	<p>been identified as less than significant. Mining operations would be conducted during daylight hours, such that only safety lighting within the plant area would be required. All light fixtures would conform to the County Light Pollution Code (LPC), or Dark Skies Ordinance, and no highly reflective building materials would be used. As discussed in Section 3.1.4, implementation of the Proposed Project would not cause significant adverse effects related to hazards and hazardous materials. As such, the Project would not be detrimental to human health and safety and would be consistent with this policy.</p>		
<p><b>LU-5.5: Projects that Impede Non-Motorized Travel.</b> 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.</p>	<p>Proposed Project access points and improvements to Willow Glen Drive would be designed in accordance with County standards, such that bicycle and pedestrian access would not be impeded. The Project would restripe Willow Glen Drive between Steele Canyon Road and the Project ingress driveway to provide Class II buffered bicycle lanes on both sides of the roadway.</p>	<p>Once mining and reclamation is completed, planned uses of the site would be limited to recreation and no conflicts with bicycle or pedestrian access would occur. Rather, multi-use trails would provide safe access through the site.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
<p><b>LU-6.1: Environmental Sustainability.</b> Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment.</p>	<p>The Project site was previously partially mined and has been developed as a golf course with landscaped and developed areas since the 1960s. As such, it does not currently include large amounts of intact or sensitive natural resources. Mining activities would avoid the existing low-flow channel and the majority of native habitat that currently remains on site. As areas are reclaimed and restored with native vegetation during the reclamation phase, the site would be converted from golf course use to open space with sensitive natural resources that would support the long-term sustainability of the natural environment.</p>	<p>Final site configuration would include native vegetation plantings that would improve on-site riparian and associated habitats and continue in the long-term, consistent with this policy.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>
<p><b>LU-6.7 Open Space Network.</b> 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.</p>	<p>The site contains two existing golf courses and would transition to phased mining activities over a 10-year period before being reclaimed as natural open space. The reclaimed open spaces on the Project site would be located adjacent to open space areas in the hills to the south, east, and west, including the San Diego National Wildlife Refuge (SDNWR) to the west.</p>	<p>Open spaces occur in the hills south, east, and west of the Project site and the SDNWR abuts the western end of the property along the Sweetwater River. After reclamation, the Project site would consist of open space areas with native vegetation that would connect to these adjacent open space areas that would protect wildlife habitat and corridors and preserve scenic</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
		vistas and areas. The multi-use trails would connect to an existing County trail at the northwestern corner of the site.	
<p><b>LU-6.8: Oversight of Open Space.</b> 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.</p>	<p>During the mining and reclamation phase, portions of the site would be under active mining operations followed by reclamation of the site into open space with native vegetation that would be maintained as open space under the ownership and management of an appropriate entity.</p>	<p>The end use of Project site after reclamation is to return the area to a vegetated site with native plantings. As such, the Project site would be maintained as open space under the ownership of an appropriate private entity. Approximately 122.4 acres of the site would be either restored or revegetated with native habitat, the vast majority of which will be conserved in perpetuity through a conservation easement, restrictive easement, and/or other protective mechanism as mitigation for Project impacts to biological resources and revegetation in accordance with the California Surface Mining and Reclamation Act of 1975 (SMARA) and County guidelines. The easement would be dedicated to an applicable land management entity for long-term management once restoration success criteria are met.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
<p><b>LU-6.10: Protection from Hazards.</b> Require that development be located and designed to protect property and residents from the risks of natural and artificially induced hazards.</p>	<p>The Project site is located downslope from surrounding residences. Proposed mining activities would not result in increased flood levels (refer to Section 3.1.5 for additional discussion) or otherwise increase risks from natural or artificially induced hazards.</p>	<p>No development or other physical changes would occur as the site would remain as open space after reclamation is completed. As a result, post-reclamation activities would not involve risks to property or residents from natural or man- induced hazards.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>
<p><b>LU-6.12: Flooding.</b> 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).</p>	<p>The pre-project hydraulic conditions are established by a Letter of Map Revision (LOMR) for the Cottonwood Golf Course, which has been approved by the County and is currently under review by FEMA. Proposed mining activities would not result in increased flood levels (refer to Section 3.1.5 for additional discussion).</p>	<p>The Project would widen the river channel, with the effects of widening partially offset by the increase in riparian vegetation on the site. At most locations, the post-reclamation condition would result in a lower water surface elevation during a 100-year flood. At the limited locations where the water surface elevation would increase, it would occur within the boundaries of the subject property and thus would be consistent with the County’s no-rise criterion (refer to Section 3.1.5 for additional discussion).</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>
<p><b>LU-8.2: Groundwater Resources.</b> Require development to identify adequate groundwater resources in groundwater dependent areas, as follows:</p> <ul style="list-style-type: none"> <li>• In areas dependent on currently identified groundwater overdrafted basins, prohibit</li> </ul>	<p>The Project is not in Borrego Valley, and the 10-year timeframe would not affect long-term supply. Water for the existing golf courses includes eight groundwater wells on the Project site with a current (golf</p>	<p>Once the Project site has been revegetated, it must be demonstrated that there has been no human intervention, including irrigation, for a two-year period. Following resource agency</p>	<p>Mining and Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
<p>new development from exacerbating overdraft conditions. Encourage programs to alleviate overdraft conditions in Borrego Valley.</p> <ul style="list-style-type: none"> <li>In areas without current overdraft groundwater conditions, evaluate new groundwater-dependent development to assure a sustainable long-term supply of groundwater is available that will not adversely impact existing groundwater users.</li> </ul>	<p>course) rate of use at approximately 803.4 acre-feet per year This would be reduced to an estimated maximum of approximately 139.9 acre-feet per year during the proposed mining operations over an approximately 10-year period and would be further reduced during the reclamation phase. The reduced rate would neither exacerbate existing conditions nor adversely affect groundwater users.</p>	<p>approval, no additional irrigation would occur. As a result, post-reclamation activities would not utilize groundwater resources and no conflicts with this policy would occur.</p>	<p>Post Reclamation: Yes</p>
<p><b>LU-8.3: Groundwater-Dependent Habitat.</b> Discourage development that would significantly draw down the groundwater table to the detriment of groundwater-dependent habitat.</p>	<p>As stated above, water use would be reduced during the mining and reclamation phase when compared to existing conditions and the proposed temporary mining and reclamation activities would not significantly draw down the groundwater table to the detriment of groundwater-dependent habitat. After reclamation activities, water use would be temporarily necessary to irrigate installed vegetation, with such use substantially less than is needed for golf course operation.</p>	<p>Following establishment, it must be demonstrated that no irrigation of revegetated areas was required for a continuous two-year period. After that, no additional irrigation would be needed, and vegetation would rely on runoff and groundwater.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
<p><b>LU-10.4: Commercial and Industrial Development.</b> Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.</p>	<p>The Project site is currently zoned as Open Space (S80, with 8-acre minimum lot sizes), Specific Planning Area (S88), and Holding Area (S90), which are not considered Semi-Rural or Rural. Truck trips from the Project site would be reallocated trips from other mines that are located further away, and the Project would result in a reduction in vehicle miles traveled (VMT) of greater than 15 percent.</p>	<p>After reclamation, the site would remain as open space; no commercial or industrial uses are proposed that would generate adverse effects associated with vehicle trips.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>
<p><b>LU-12.2: Maintenance of Adequate Service.</b> 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 LOS but do not achieve a LOS of D or better.</p>	<p>The Project involves mining portions of the site over a 10-year period followed by reclaiming the site with open space uses. Trucking operations would occur between 9:00 a.m. and 3:30 p.m. to minimize traffic impacts. All intersections within the traffic study area would operate at an acceptable level of service (LOS), with the exception of the intersection of Willow Glen Drive and Muirfield Drive, which is calculated to operate at LOS E or worse (LOS F during AM and LOS E during PM peak period). However, no vehicular mobility deficiencies have been calculated to occur at study area intersections,</p>	<p>After reclamation, the site would remain as open space and would not result in generation of traffic or impacts to existing levels of service on Mobility Element roads or to public facilities or services. The Project proposes improvements to Willow Glen Drive between Steele Canyon Road and the Project egress driveway and construction of a two-way left-turn lane between the Project driveways, which would serve as a refuge lane for trucks to complete their outbound maneuver. To accommodate the potential future widening of Willow Glen Drive to the</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
	since the Project’s contribution would not exceed the allowable thresholds.	Mobility Element roadway classification, an Irrevocable Offer of Dedication would be provided along the Project frontage, as needed.	
<b>LU-13.2: Commitment of Water Supply.</b> Require new development to identify adequate water resources, in accordance with State law, to support the development prior to approval.	Mining operations would utilize eight groundwater wells on the Project site that currently provide approximately 803.4 acre-feet per year for golf course operations. Water use associated with mining would be reduced to approximately 139.9 acre-feet per year, thereby lowering water use to less than 20 percent of existing draw. Adequate water resources would be available to serve the Project.	After reclamation, wells not to be used by the property owner or for groundwater monitoring would be properly abandoned in accordance with County requirements and standards. Following establishment, it must be demonstrated that no irrigation of revegetated areas was required for a continuous two-year period. After that, no additional irrigation would be needed.	Mining and Reclamation: Yes  Post Reclamation: Yes
<b>LU-14.2: Wastewater Disposal.</b> Require that development provide for the adequate disposal of wastewater concurrent with the development and that the infrastructure is designed and sized appropriately to meet reasonably expected demands.	The Project would utilize portable restroom(s). One portable restroom would be placed in the plant area and the second would be placed near the active excavation area and moved as needed. They would be serviced at appropriate intervals by contract vendors. No sewer connections or other permanent wastewater infrastructure is proposed.	After reclamation, no sewage would be generated on site and no wastewater infrastructure would be present.	Mining and Reclamation: Yes  Post Reclamation: Yes

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
<b>Mobility Element</b>			
<p><b>M-2.3: Environmentally Sensitive Road Design.</b> 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 roadkill and to direct animals to under crossings.</p>	<p>No new off-site roads would be required, and all on-site roads would be private. Vehicles and haul trucks traveling to and from the Project site would utilize existing roadways. This heavy reliance on existing access would minimize effects to undisturbed resources. New ingress and egress driveways for the processing plant would be located between Willow Glen Drive and the existing parking lot, so would not adversely affect sensitive environmental resources. Additionally, much of the proposed activity would take place in disturbed (golf course) portions of the site, which also would minimize effects to sensitive resources. Phase 1 would include site development for the construction of the internal access road and processing plant pad, as well as installation of screening berms, and the conveyor line (used on site to minimize need for trucks and roads).</p> <p>It is noted that three existing transmission towers owned by SDG&amp;E would be avoided during</p>	<p>Post reclamation site activities would consist of open space, with some trails that would support some recreational use of the property. The SDG&amp;E towers and associated access road would remain but would not obstruct flows and the minimal use of the road for tower maintenance purposes would not adversely affect wildlife movement.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
	<p>Phase 2 excavation, leaving an “island” for the towers. An access ramp would be constructed on the southwestern side of the island to connect to a 20-foot-wide access road within the existing SDG&amp;E right-of-way easement extending from the towers to the southern Project boundary. Maintenance of this access road/ramp would ensure that SDG&amp;E maintenance crews are able to access the towers during Project operations and would not obstruct river flows.</p>		
<p><b>M-4.4: Accommodate Emergency Vehicles.</b> 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.</p>	<p>Access roads within the Project site would be installed to accommodate mining activities and surrounding existing public roadways would continue to provide access to the site, including fire and emergency vehicles. All driveways into the Project site would be constructed of an all-weather surface a minimum of 24 feet wide, suitable for travel by a 75,000-pound fire apparatus. San Miguel Consolidated Fire Protection District staff reviewed the Project and did not identify access/egress concerns. During mining operations, approximately 9 staff would be</p>	<p>San Miguel Consolidated Fire Protection District staff reviewed the Project and did not identify access/egress concerns after reclamation activities are completed. The Project would be reclaimed to open space use, with no residents requiring evacuation.</p>	<p>Mining and Reclamation: Yes  Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
	present on site, resulting in minimal evacuation needs.		
<p><b>M-10.7: Parking Area Design for Stormwater Runoff.</b> 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.</p>	<p>Portions of the existing lower and upper parking lots (providing 320 parking spaces for golf course patrons) would be used during the mining and reclamation phase of the Project. During operations, runoff from these parking areas would be controlled via requirements that would be detailed in the Project Storm Water Pollution Prevention Program (SWPPP).</p>	<p>After reclamation, the Project would not result in impervious areas that do not currently exist. Existing parking areas would be reduced or removed entirely.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>
<b>Conservation and Open Space Element</b>			
<p><b>COS-2.2: Habitat Protection through Site Design.</b> Require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design.</p>	<p>Mining activities would occur primarily in disturbed areas that have historically been used as a public golf course, minimizing impacts during mining through focus of mining activities in the least biologically sensitive areas. Mining activities would avoid the Sweetwater River channel and the majority of native habitat extant on the site. As mining is completed, the Project site would be reclaimed as open space and revegetated with native plants. Mining and reclamation activities would not conflict with this policy to minimize impacts to biological resources.</p>	<p>After reclamation, development would be limited to some recreational trails that would complement the revegetated site and no conflicts with this policy would result.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
<p><b>COS-3.1: Wetland Protection.</b> Require development to preserve existing natural wetland areas and associated transitional riparian and upland buffers and retain opportunities for enhancement.</p>	<p>Mining activities would primarily occur in disturbed areas that have historically been used as a public golf course. Specifically, the existing Sweetwater River channel and the majority of native habitat that currently exists on the site would be retained. Following mining, reclamation activities would convert the site to open space with native vegetation, including both wetland vegetation and upland buffers. As mitigation to limited impacts that would occur to natural wetland areas, wetland vegetation would be created, restored, and/or enhanced on site. As a result, the Project would largely preserve existing natural areas and would create/enhance others at the conclusion of mining activities, consistent with this policy.</p>	<p>After reclamation, the Project site would continue to provide open space areas with native vegetation and development would be limited to multi-use trails. No conflicts with this policy would result.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>
<p><b>COS-3.2: Minimize Impacts of Development.</b> Require development projects to:</p> <ul style="list-style-type: none"> <li>• Mitigate any unavoidable losses of wetlands, including its habitat functions and values; and</li> <li>• 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,</li> </ul>	<p>The majority of jurisdictional areas on site would be avoided as a matter of Project design. As part of the Project entitlement process, permits from the resource agencies would be required for mining activities that are proposed in wetland areas. Mining activities would occur temporarily within jurisdictional</p>	<p>Upon completion of reclamation activities, the amount of wetland habitat on site would be substantially increased relative to the current degraded condition of the site. Areas dedicated as mitigation for wetland impacts would be subject to management in perpetuity to maintain the</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
<p>hydromodification, land and vegetation clearing, and the introduction of invasive species.</p>	<p>wetland areas over a 10-year period, after which all areas would be reclaimed and revegetated as open space. As a result, there would not be unavoidable permanent losses of wetlands and discharge, dredging, or adding fill material would be reviewed and permitted by applicable regulatory agencies with mitigation implemented as required, consistent with this policy. Invasive, non-native species (e.g., weeds) would be continuously removed during mining and reclamation activities. The Project also would be subject to requirements to protect the quality of runoff draining to the Sweetwater River during mining operations.</p>	<p>newly established habitat values. Conceptual multi-use trails have been sited to be compatible with the proposed revegetation plan.</p>	
<p><b>COS-4.1: Water Conservation.</b> 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.</p>	<p>Potable water use associated with the Project would be limited to bottled drinking water provided by a private vendor for mine staff. Groundwater use for materials processing and reclamation would be substantially less (approximately 139.9 acre-feet per year) than existing use rates (approximately 803.4 acre-feet per year).</p>	<p>After reclamation, the Project site would be kept as open space. No potable water use would occur and no irrigation of vegetation would be required.</p>	<p>Mining and Reclamation: Yes  Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
<p><b>COS-4.2: Drought-Efficient Landscaping.</b> 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.</p>	<p>Site landscaping along the Willow Glen Road frontage would include native and non-invasive, drought-tolerant/low water use plants. Reclamation activities would be conducted with native plants. Plants would be irrigated until mature. Reclaimed areas would be subject to a five-year maintenance and monitoring program and would be required to survive at least two years without irrigation prior to sign-off that site reclamation requirements have been met.</p>	<p>Post reclamation, the non-irrigated vegetation on site would be retained.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>
<p><b>COS-5.1: Impact to Floodways and Floodplains.</b> Restrict development in floodways and floodplains in accordance with policies in the Flood Hazards section of the Safety Element.</p>	<p>The Project would remove existing development within the floodplain (i.e., golf course clubhouse, maintenance facility, and restrooms) and replace it with limited facilities associated with the processing plant. The proposed facilities would be located outside of the floodway, would not require channel modifications, and would conform to federal flood protection policies.</p>	<p>No development is proposed on site following site reclamation. The Project would widen the river channel to conditions more similar to what occurred prior to channelization for the golf course. The increased flow capacity from widening would be partially offset by the increase in riparian vegetation on the site. At most locations, the post-reclamation condition would result in a lower water surface elevation during a 100-year flood. At the limited locations where the water surface elevation would increase, it would occur within the</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
		boundaries of the subject property and thus would be consistent with the County’s no-rise criterion (refer to Section 3.1.5 for additional discussion).	
<p><b>COS-5.2: Impervious Surfaces.</b> 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.</p>	<p>Development associated with the proposed mining activities would remove existing impervious surfaces associated with golf course operations and involve minor addition of impervious surfaces on site, including a processing plant, storage containers, weigh scale, and modular scale house over an approximate 10-year period, as well as improvements to Willow Glen Drive. As areas are reclaimed, impervious surfaces would be removed from the site.</p>	<p>There would be minimal impervious surfaces once the Project site has been reclaimed. These would be limited to the existing SDG&amp;E towers and potential associated riprap, Willow Glen Drive improvements, and potentially a portion of the existing parking lot. This would represent a substantial decrease in impervious surfaces on the site.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>
<p><b>COS-5.3: Downslope Protection.</b> 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.</p>	<p>The Project involves mining portions of the Project site over three mining phases and reclaiming mined areas as each sub-phase is completed. These areas would be set back from existing Sweetwater River channel. Soil stabilization BMPs, silt fences, and desiltation would minimize potential effects from erosion and sedimentation. Reclamation would include some grading, would widen the river</p>	<p>Areas restored during the mining and reclamation phase would not be altered in the post-reclamation phase. The protection of downslope areas from erosion, the capture of runoff, and the protection of downstream biological resources would continue under the post-reclamation phase of the Project.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
	channel to approximately 250 to 300 feet in width, and would revegetate with native plants to create a natural environment that would protect downslope areas from erosion, capture runoff, and protect downstream biological resources.		
<b>COS-5.5: Impacts of Development to Water Quality.</b> Require development projects to avoid impacts to the water quality in local reservoirs, groundwater resources, and recharge areas, watersheds, and other local water sources.	Avoidance of potential significant impacts to water quality is required through mandatory regulatory compliance as documented in the Project Water Quality Technical Report and Section 3.1.5 of this EIR. A SWPPP would be prepared and submitted to the State Water Resources Control Board prior to construction in accordance with the Industrial General Permit Order 2014-0057-DWQ, effective July 1, 2015.	Post reclamation, the site would contain multi-use trails and revegetated open space. Significant impacts to water quality in local reservoirs, groundwater resources, and recharge areas, watersheds, and other local water sources would not result from these passive uses.	Mining and Reclamation: Yes  Post Reclamation: Yes
<b>COS-7.1: Archaeological Protection.</b> Preserve important archaeological resources from loss or destruction and require development to include appropriate mitigation to protect the quality and integrity of these resources.	Detailed records searches and on-site survey identified three on-site resources (CA-SDI-17943, CGC-S-001 and CDC-S-002) that would be affected by Project grading. All three are sparse lithic and shell scatters with limited material located in disturbed areas of the golf course, and all three were identified as not important/ significant. Although their limited artifact coverage and	Post reclamation, no additional ground disturbance would occur beyond that addressed under Mining and Reclamation. There is not known potential for loss or destruction of archaeological resources.	Mining and Reclamation: Yes  Post Reclamation: Yes

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
	<p>research potential indicate that these sites are not important, monitoring during mining has been identified as mitigation. If additional resources are located, they would be evaluated and curated as appropriate in accordance with EIR Mitigation Measures M-CR-1 through M-CR-3.</p>		
<p><b>COS-7.3: Archaeological Collections.</b> Require the appropriate treatment and preservation of archaeological collections in a culturally appropriate manner.</p>	<p>As described under COS-7.2, above, mitigation is required due to the potential for important archaeological sites located within the golf course. Any collections made during evaluation of these resources would be curated as appropriate in accordance with EIR Mitigation Measures M-CR-1 through M-CR-3.</p>	<p>Post reclamation, no additional ground disturbance would occur beyond that addressed under Mining and Reclamation. Collections would not be gathered and preservation/ curation of them would not be required. This policy is not applicable to this phase of the Project.</p>	<p>Mining and Reclamation: NA/Yes</p> <p>Post Reclamation: NA</p>
<p><b>COS-9.1: Preservation.</b> Require the salvage and preservation of unique paleontological resources when exposed to the elements during excavation or grading activities or other development processes.</p>	<p>The site contains formations with no, or low, paleontological resource sensitivity. As described in EIR Subchapter 2.5, “low resource sensitivity” is assigned to geologic formations that, based on their relatively young age and/or high-energy depositional history, are judged unlikely to produce unique fossil remains. Although infrequent, when fossils are found in these formations, they often comprise significant additions to the geologic</p>	<p>Post reclamation, the site would comprise open space, without earth moving actions. Potentially fossil-bearing formations of low sensitivity would not be impacted.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: NA/Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
	<p>understanding of the area. Mitigation has been identified to ensure that appropriate fossils identified during mining would be removed from the site, with research and curation completed as necessary and appropriate.</p>		
<p><b>COS-10: Protection of Mineral Resources.</b> The long-term production of mineral materials adequate to meet the local County average annual demand, while maintaining permitted reserves equivalent to a 50-year supply, using operational techniques and site reclamation methods consistent with SMARA standards such that adverse effects on surrounding land uses, public health, and the environment are minimized.</p>	<p>In accordance with the Project objectives, the Project has been designed to allow for the recovery and processing of construction aggregates in a financially sound and efficient manner, while taking into account environmental considerations. The Project would extract aggregate resources for local uses. Providing an additional local supply of aggregate material would reduce the need to import material from more distant mines and support the County’s demand for aggregate resources.</p>	<p>Post reclamation, no additional ground disturbance would occur beyond that addressed under Mining and Reclamation. This policy is not applicable to this phase of the Project.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: NA/Yes</p>
<p><b>COS-10.2: Protection of State-Classified or Designated Lands.</b> Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of</p>	<p>The Project proposes mining of a known mineral resource; the site would be reclaimed in accordance with the Reclamation Plan for uses that would be allowed by the zoning classification. The mineral resources classification has been considered in the selection of this site for the proposed extraction facility.</p>	<p>Reclaimed areas would be restored in accordance with the Project Reclamation Plan to an end use of open space, but could support land suitable for uses allowed by the existing land use designation and zoning classifications. Future development of the site is not</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.		included in the Proposed Project and would require subsequent environmental review. No conflicts with this policy would result.	
<p><b>COS-10.5: Reclamation Plans.</b> Require all mining projects to be conducted in accordance with a reclamation plan that meets the minimum reclamation standards required by the California Surface Mining and Reclamation Act and the associated State Mining and Geology Board regulations. Require the reclamation plan to include a phasing plan that provides for the completion of the surface mining on each segment of the mined lands so that the reclamation can be initiated at the earliest possible time on those portions of the mined lands that will not be subject to further disturbance by the surface mining operation.</p>	<p>As described under COS-10.2, above, proposed mining and reclamation activities would be implemented pursuant to the Reclamation Plan prepared for the Project. The Reclamation Plan specifies the standards to which the site must be reclaimed upon completion of mining activities in accordance with SMARA regulations. The extraction process would occur in three phases, with three to four subphases of less than 30 acres each in each phase, and a fourth phase for cleanup, equipment removal, and final reclamation. Reclamation would be an ongoing process starting in the second year as mining proceeds to the east and would continue in each 20- to 30-acre subphase over an approximately 10-year period, concluding two years after the completion of mining.</p>	<p>Post reclamation, no additional ground disturbance would occur beyond that addressed under Mining and Reclamation. This policy is not applicable to this phase of the Project.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: NA/Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
<p><b>COS-10.6: Conservation of Construction Aggregate.</b> Encourage the continued operation of existing mining facilities and streamline the permitting of new mining facilities consistent with the goal to establish permitted aggregate resources that are sufficient to satisfy 50 years of County demand.</p>	<p>In accordance with the Project objectives, the Project has been designed to allow for the recovery and processing of construction aggregates in a financially sound and efficient manner, while taking into account environmental considerations. The Project would extract aggregate resources for local uses. Providing an additional local supply of aggregate material would reduce the need to import material from more distant mines and support the County’s demand for aggregate resources.</p>	<p>Post reclamation, no additional ground disturbance would occur beyond that addressed under Mining and Reclamation. This policy is not applicable to this phase of the Project.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: NA/Yes</p>
<p><b>COS-10.7 Recycling of Debris.</b> Encourage the installation and operation of C&amp;D debris recycling facilities as an accessory use at permitted (or otherwise authorized) mining facilities to increase the supply of available mineral resources.</p>	<p>No construction or demolition recycling is proposed as a component of the Project; however, a Construction and Demolition Debris Management Plan would be developed to divert debris from construction and demolition away from landfills. In accordance with County Ordinance Sections 68.508 through 68.518, 90 percent of inert materials and 70 percent of all other construction and demolition debris generated by the Project would be recycled.</p>	<p>This policy is not applicable to this phase of the Project.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: NA/Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
<p><b>COS-10.8: New Mining Facilities.</b> Develop specific permit types and procedures for the authorization of new mining facilities that recognize the inherent physical effects of mining operations and the public necessity for available mineral resources adequate to meet local demand, in accordance with PRC Section 2762.</p>	<p>In accordance with the Project objectives, the Project has been designed to allow for the recovery and processing of construction aggregates in a financially sound and efficient manner, while taking into account environmental considerations.</p>	<p>This policy is not applicable to this phase of the Project.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: NA/Yes</p>
<p><b>GOAL COS-11: Preservation of Scenic Resources.</b> Require the protection of scenic highways, corridors, regionally significant scenic vistas, and natural features, including prominent ridgelines, dominant landforms, reservoirs, and scenic landscapes.</p>	<p>The Project is located in a river valley surrounded by prominent scenic features including hillsides, ridgelines, and mountainous terrain. The Project would not affect any of these features. No designated landmarks (i.e., a visual feature or element designated or identified in an adopted land use plan as an important visual or scenic resource) or identified visual resources such as unique topographical features, designated historic resources, or prominent rock outcroppings or ridgelines occur on site.</p> <p>Willow Glen Drive is included in the County’s Scenic Highway System. The Project proposes to implement a landscape screening and entrances plan to supplement existing screening vegetation along Willow Glen Drive to aid in the screening of</p>	<p>Long-term changes within the Project site post reclamation would contribute positively to the valued views experienced along Willow Glen Drive. At maturity (approximately five to seven years post-installation), trees and shrubs of the revegetation plan would improve the visual character of the Project site. Visual quality and particularly, intactness and unity, would also be improved with mature vegetation that would cover the subphase areas. Scenic views experienced along the segment of the roadway bordering the Project site would be an extension of the continuous pattern elements of the surrounding visual environment within the river valley.</p>	<p>Mining and Reclamation: No</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
	<p>the processing plant and mining activities from road users. Approximately 67 existing trees would be removed to construct the Project entrance and Willow Glen Drive improvements. Further, six-foot-high, chain-link fencing with mesh screening is proposed to be installed along the property boundary that would further block views of project components and visual effects.</p> <p>While Project components and contrasts would be partially screened from view near the processing plant, new fencing and mesh screening would restrict available views and reduce visual quality along the Willow Glen Drive corridor. Views towards the Project site along the approximately 0.14-mile-long parking lot frontage of Willow Glen Drive are limited in length by mature landscaping installed near the clubhouse. However, visual change on the Project site and seen landscape experienced from Willow Glen Drive would be notable, strong, and perceived negatively by users of Willow Glen Drive. Thus,</p>		

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
	the Project would not protect and enhance the appearance of the scenic landscape experience from Willow Glen Drive.		
<p><b>COS-11.1: Protection of Scenic Resources.</b>                      Require the protection of scenic highways, corridors, regionally significant scenic vistas, and natural features, including prominent ridgelines, dominant landforms, reservoirs, and scenic landscapes.</p>	<p>The General Plan identifies Willow Glen Drive as a scenic highway corridor. The Project proposes to implement a landscape screening and entrances plan to supplement existing screening vegetation in along Willow Glen Drive and help screen the plant from viewers north of the site. Six-foot-high, chain-link security fencing would be installed along the property boundary with Willow Glen Drive; screening mesh would be utilized along segments of the fence that lack the existing mature trees and screening vegetation to screen Project operations, and where no landscape screening is proposed. While a screening element would be added into views from the roadway, existing views to the golf course are partially screened by existing mature trees. Relatively clear albeit short-duration views to the golf course are available from the road but are routinely interrupted by trees and shrubs. New fencing would shorten</p>	<p>Long-term changes within the Project site post reclamation would contribute positively to the local scenic resources, as well as to valued views experienced along Willow Glen Drive, a County-designated scenic highway corridor. Once post-reclamation vegetation reaches maturity (approximately five to seven years post reclamation for each phase), the visual quality of the viewshed would improve over existing conditions. Views experienced from Willow Glen Drive bordering the Project site would improve as site vegetation would enhance the existing riparian corridor on the Project site and expand characteristic features of the Sweetwater River corridor (off-site segments) including dense and mature vegetation to sub-phase areas.</p>	<p>Mining and Reclamation: No</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
	<p>the existing narrow available views to the golf course from Willow Glen Drive. Views towards the Project site along the approximately 0.14-mile long parking lot frontage of Willow Glen Drive are limited in length by mature landscaping installed near the clubhouse. Still, visual change associated with Project fencing in views from the scenic roadway would be notable. While existing views along the Project frontage are partially screened and consist of a golf course, the Project would limit and shorten available views from the Willow Glen Drive corridor.</p> <p>As proposed, the Project would introduce a phased mining operation to the visual environment of the Project site (i.e., the Cottonwood Golf Club) and surrounding setting. The Project would alter the composition of the existing visual environment by removing vegetation in subphases, exposing underlying soils, grading and excavation, and by the presence of mining equipment, vehicles, a processing plant area, and stockpiles. These</p>		

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
	<p>features would be experienced from public vantage points and create visible contrast in the landscape visible from Willow Glen Drive (a scenic highway). Mining and reclamation activities would create notable physical changes in the composition of the visual environment, as viewed from Willow Glen Drive, Steele Canyon Road, and surrounding recreational and residential areas that would result in reduced visual quality of the site and surrounding area.</p>		
<p><b>COS-11.2: Scenic Resources Connections.</b>                      Promote the connection of regionally significant natural features, designated historic landmarks, and points of regional historic, visual, and cultural interest via designated scenic corridors, such as scenic highways and regional trails.</p>	<p>See response to GOAL COS-11, above.</p> <p>While project components and contrasts would be partially screened from view near the processing plant, new fencing and mesh screening would restrict available views and reduce visual quality along the Willow Glen Drive corridor. Views towards the Project site along the approximately 0.14-mile-long parking lot frontage of Willow Glen Drive are limited in length by mature landscaping installed near the clubhouse. However, visual change on the Project site and seen</p>	<p>See response to GOAL COS-11, above.</p> <p>Long-term changes within the Project site post reclamation would contribute positively to the valued views experienced along Willow Glen Drive. At maturity (approximately five to seven years post-installation), trees and shrubs of the revegetation plan would improve the visual character of the Project site. Visual quality and particularly, intactness and unity, would also be improved with mature vegetation that would cover the</p>	<p>Mining and Reclamation: No</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
	<p>landscape experienced from Willow Glen Drive would be notable, strong, and perceived negatively by users of Willow Glen Drive. Thus, the Project would not protect and enhance the appearance of the scenic landscape experience from Willow Glen Drive.</p>	<p>subphase areas. Scenic views experienced along the segment of the roadway bordering the Project site would be an extension of the continuous pattern elements of the surrounding visual environment within the river valley.</p>	
<p><b>COS-11.3: Development Siting and Design.</b> 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:</p> <ul style="list-style-type: none"> <li>• Creative site planning</li> <li>• Integration of natural features into the project</li> <li>• Appropriate scale, materials, and design to complement the surrounding natural landscape</li> <li>• Minimal disturbance of topography</li> <li>• Clustering of development so as to preserve a balance of open space vistas, natural features, and community character.</li> <li>• Creation of contiguous open space networks</li> </ul>	<p>Regarding creative site planning, existing on-site landscaping and mature trees along Willow Glen Drive and the southern boundary of the Project site would be maintained as part of the Proposed Project to provide vegetative screening for adjacent residences. In addition, the Project would implement a Landscape Screening and Entrances Plan to provide landscaping adjacent to the Project entrances and additional screening of the plant area from Willow Glen Drive. Lastly, mining and reclamation activities are proposed on a developed property/use (i.e., the Cottonwood Golf Club) including the unmaintained Lakes Course. As such, the Project would not be located on a natural, previously undisturbed site.</p>	<p>No industrial activities would occur during the post-reclamation phase of the Project. Existing landscape vegetation and mature trees along Willow Glen Drive would be retained. Riparian and upland vegetation would be sequentially planted following subphase mine operations and reclamation to create an enhanced and widened riparian and upland corridor. Long-term changes within the Project site in the post-reclamation scenario would contribute positively to the valued views experienced along Willow Glen Drive and visual quality of the area. At maturity (approximately five to seven years post reclamation for each phase), the visual character of the Project site would be enhanced with native vegetative cover and</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
	<p>During mining and reclamation activities, the existing Sweetwater River channel would be modified but the majority of native habitat that currently exists on the site would be protected in place. In addition, the southwestern corner of the Project site would be retained in its existing conditions and would not be altered by mining activities. However, the balance of the Project site would be subject to visual disturbance including the removal of vegetation, grading, and excavation that would create noticeable contrast where visible. In addition, the Project consists of mining and reclamation activities that would create contrast with the surrounding natural landscape over a 12-year period.</p> <p>As a mining project, the Project would modify the existing topography of the site. Specifically, approximately four inches of topsoil would be stripped from the surface and placed in low berms or windrows. When feasible, topsoil would be stripped from the surface and directly reapplied to areas that</p>	<p>appropriate landforms for site drainage.</p> <p>Reclaimed areas would be restored to an end use of open space, but could also support land suitable for uses allowed by the existing land use designation and zoning classifications. Future development of the site is not included in the Proposed Project and would require subsequent environmental review.</p> <p>Implementation of the proposed Reclamation Plan and retention of approximately 125.4 acres of preserved, rehabilitated, and restored habitat in on-site open space would ensure that the Project would be in conformance with this policy.</p>	

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
	<p>have reached final grade to avoid storing soil. The maximum excavation depth is proposed to be 40 feet below the existing ground surface (bgs) outside the existing Sweetwater River channel. The average depth of excavation is expected to be approximately 30 feet bgs.</p> <p>While the Project would utilize existing street trees and introduce new landscaping to aid in site screening the Project would not compliment the surrounding natural landscape during mining and reclamation. In addition, the average depth of excavation is expected to be approximately 30 feet bgs. As a mining project, minimal disturbance of topography would be difficult to achieve while also achieving project objectives.</p>		
<p><b>COS-13.1: Restrict Light and Glare.</b> 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.</p>	<p>The Project is not a traditional development project and does not include the construction of structures or the addition of long-term light sources such as exterior mounted light fixtures or streetlights. During mining operations, some shielded night lighting may be installed for</p>	<p>After reclamation, no site lighting is proposed and no on-site light and glare would be produced.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
	security purposes. The lighting would be designed to minimize glare and reflection or spill onto neighboring areas, and would include pole-mounted sodium, metal halide, fluorescent or LED lighting that would be operated with cut-offs to reduce light pollution.		
<p><b>COS-14.8: Minimize Air Pollution.</b> Minimize land use conflicts that expose people to significant amounts of air pollutants.</p>	<p>Dust and other pollutant emissions could be generated during Project activities. As described in EIR Chapter 1.0, the Project has incorporated BMPs to reduce fugitive dust consistent with SDAPCD Rule 55 – Fugitive Dust Control during construction and mine operation and reclamation. In addition, dust would be controlled in the sand processing and washing facilities using best available control technology (BACT), primarily the application of sufficient water to eliminate visible emissions. Diesel exhaust emissions from on- and off-road equipment would be required to implement BACT for reduction of exhaust PM, involving replacement of older equipment with equipment meeting the United States Environmental Protection Agency (USEPA) Tier-4 specifications or</p>	<p>Post reclamation, the site would constitute revegetated open space, with multi-use trails. No on-site uses are proposed that would generate or expose people to significant amounts of air pollutants.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
	retrofitting equipment with diesel particulate filters, in accordance with California Air Resources Board (CARB) regulations and implementation schedules. All of these actions would minimize land use conflicts that could expose people to significant amounts of air pollutants and would reduce the pollutants to less than significant levels.		
<p><b>COS-14.9: Significant Producers of Air Pollutants.</b> 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.</p>	<p>The Project is not a large land development project that can incorporate renewable energy. It has, however, incorporated BACT into Project design. These require replacement of older equipment with equipment meeting the USEPA Tier-4 specifications or retrofitting equipment with diesel particulate filters, in accordance with CARB regulations and implementation schedules as described in the evaluation of COS-14.8. The updated equipment types use lower amounts of non-renewable resources such as gas, as well as reducing pollutant emissions.</p>	<p>Post reclamation, the site would constitute revegetated open space, with multi-use trails. No on-site uses are proposed that would generate potentially significant levels of air pollutants or GHGs. This policy is not applicable to post-reclamation site uses.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: NA</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
<p><b>COS-14.10: Low-Emission Construction Vehicles and Equipment.</b> Require County contractors and encourage other developers to use low-emission construction vehicles and equipment to improve air quality and reduce GHG emissions.</p>	<p>As noted in the evaluation of COS-14.8, Project design requires replacement of older equipment with equipment meeting the USEPA Tier-4 specifications or retrofitting equipment with diesel particulate filters, in accordance with CARB regulations and implementation schedules. This would result in use of lower emission construction vehicles/equipment and would support improved air quality and reduced GHG emissions over projects without these BACT requirements.</p>	<p>Post reclamation, the site would constitute revegetated open space, with multi-use trails. No construction activities or equipment usage are proposed during this phase. This policy is not applicable to post-reclamation site uses.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: NA</p>
<p><b>COS-14.11: Native Vegetation.</b> Require development to minimize the vegetation management of native vegetation while ensuring sufficient clearing is provided for fire control.</p>	<p>During mining, all vegetation within the active subphase area would be removed. Vegetation outside of the active subphase area would remain in place until prior to active mining of the area (e.g., vegetation within subphases 1B and 1C and phase 2 and 3 would remain in place during mining of the subphase 1A area except where clearing of vegetation and stockpiling of topsoil is needed for sound barrier construction.</p>	<p>Area vegetated with native plant communities would be managed with minimal oversight. These areas are intended to be preserved as natural open spaces.</p>	
<p><b>COS-15.6: Design and Construction Methods.</b> Require development design and construction methods to minimize impacts to air quality.</p>	<p>As described under the evaluation of COS-14.8, above, and in EIR Chapter 1.0, the Project has incorporated BMPs to reduce</p>	<p>Revegetation established as part of reclamation would be retained, which would control potential dust generation, and no on-site</p>	<p>Mining and Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
	<p>fugitive dust consistent with SDAPCD Rule 55 during construction and mine operation and reclamation and would control dust in the sand processing and washing facilities using BACT (primarily the application of sufficient water to eliminate visible emissions). Diesel exhaust emissions from on- and off-road equipment would be required to implement BACT for reduction of exhaust PM through replacement of older equipment with equipment USEPA Tier-4 specifications or retrofitting equipment with diesel particulate filters, in accordance with CARB regulations and implementation schedules. All of these actions would minimize impacts to air quality.</p>	<p>uses are proposed that would generate other emissions (post-reclamation site activities would consist of open space with multi-use trails).</p>	<p>Post Reclamation: NA/Yes</p>
<p><b>COS-17.2: Construction and Demolition Waste.</b> Require recycling, reduction and reuse of construction and demolition debris.</p>	<p>As described in EIR Chapter 1.0, a Construction and Demolition Debris Management Plan would be developed to divert debris from construction and demolition away from landfills. In accordance with County Ordinance Sections 68.508 through 68.518, 90 percent of inert materials and 70 percent of all other construction and demolition debris</p>	<p>Post reclamation site activities would consist of open space. No on-site uses are proposed that would generate materials to be recycled, reduced, or reused.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: NA/Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
	generated by the Project would be recycled.		
<b>Safety Element</b>			
<p><b>S-3.1: Defensible Development.</b> 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.</p>	<p>The FPP developed for the Proposed Project outlines recommendations for minimizing hazards related to wildfires (FireWise 2021). The FPP recommendations include guidance on fire access roads, property line setback distances, defensible space, vegetation management, and owner-maintained fuel modification. The Proposed Project would adhere to the recommendations within the FPP, minimizing potential impacts related to wildfire.</p>	<p>Post reclamation, the site would consist of open space, with no structures that require fire protection. This policy is not applicable to the Project post-reclamation phase.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: NA</p>
<p><b>S-3.6: Fire Protection Measures.</b> Ensure that development located within fire threat areas implement measures that reduce the risk of structural and human loss due to wildfire.</p>	<p>The Project would adhere to measures identified in the FPP to reduce the risk of structural and human loss due to wildfire. These measures include considerations related to fire access roads, property line setback distances, defensible space, vegetation management, and owner-maintained fuel modification.</p>	<p>Post reclamation, the site would consist of open space, with no structures that require fire protection. This policy is not applicable to the Project post-reclamation phase.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: NA</p>
<p><b>S-3.7: Fire Resistant Construction.</b> Require all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes and establish and enforce reasonable and prudent</p>	<p>Proposed structures to be located on site during mining activities would be a scale, office kiosk, and office trailer. Each of these facilities would</p>	<p>Post reclamation site conditions would consist of open space. No on-site structures are proposed that would need to meet fire code. This policy is not applicable to</p>	<p>Mining and Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
standards that support retrofitting of existing structures in high fire threat areas.	meet current, applicable ignition resistance construction codes.	the Project post-reclamation phase.	Post Reclamation: NA
<b>S-9: Protection of Life and Property.</b> Minimized personal injury and property damage losses resulting from flood events.	The Project proposes very few employees (nine), and no permanent structural uses during mining phases. It also would include sediment basins, few impermeable surfaces, setbacks from the river, etc. The type of project and its design result in minimal probability of personal injury or property damage resulting from flood events. During the final reclamation phase, the few temporary structures would be removed, the riverbed would be widened to approximately 250 to 300 feet, and daily employees would no longer be on site. This would result in even further minimized potential for personal injury and would eliminate potential for property damage losses.	Post reclamation site activities would consist of open space, with multi-use trails that would support some recreational use of the property. The potential for structural property damage would not exist and potential for personal injury would be low, consistent with other open trail uses.	Mining and Reclamation: Yes  Post Reclamation: Yes
<b>S-9.2: Development in Floodplains.</b> 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.	The Project would remove existing development within the floodplain (i.e., golf course clubhouse, maintenance facility, and restrooms) and replace it with limited facilities associated with the processing plant. The proposed facilities would be located outside of the floodway,	No development is proposed on site following site reclamation. The Project would widen the river channel to conditions more similar to what occurred prior to channelization for the golf course. The increased flow capacity from widening would be partially	Mining and Reclamation: Yes  Post Reclamation: Yes

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
	<p>would not require channel modifications, and would conform to federal flood proofing standards and siting criteria to prevent flow obstruction.</p>	<p>offset by the increase in riparian vegetation on the site. At most locations, the post-reclamation condition would result in a lower water surface elevation during a 100-year flood. At the limited locations where the water surface elevation would increase, it would occur within the boundaries of the subject property and thus would be consistent with the County’s no-rise criterion (refer to Section 3.1.5 for additional discussion).</p>	
<p><b>S-9.3: Development in Flood Hazard Areas.</b> 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.</p>	<p>The Project would remove existing development within the floodplain (i.e., golf course clubhouse, maintenance facility, and restrooms) and replace it with limited facilities associated with the processing plant. The proposed facilities would be located outside of the floodway, and would be sited and designed to minimize on- and off-site hazards due to flooding.</p>	<p>No development is proposed on site following site reclamation. The Project would widen the river channel to conditions more similar to what occurred prior to channelization for the golf course. The increased flow capacity from widening would be partially offset by the increase in riparian vegetation on the site. At most locations, the post-reclamation condition would result in a lower water surface elevation during a 100-year flood. At the limited locations where the water surface elevation would increase, it would occur within the</p>	<p>Mining and Reclamation: Yes  Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
		boundaries of the subject property and thus would be consistent with the County’s no-rise criterion (refer to Section 3.1.5 for additional discussion).	
<p><b>S-10: Floodway and Floodplain Capacity.</b> Floodways and floodplains that have acceptable capacity to accommodate flood events.</p>	<p>As mining occurs, the Project would widen the river channel to conditions more similar to what occurred prior to channelization for the golf course. The increased flow capacity from widening would be partially offset by the increase in riparian vegetation on the site through reclamation. At most locations, this would result in a lower water surface elevation during a 100-year flood. At the limited locations where the water surface elevation would increase, it would occur within the boundaries of the subject property.</p>	<p>Post reclamation, the reclaimed river channel would continue to have adequate capacity to accommodate flood events, with limited locations where the 100-year water surface elevation would increase within the boundaries of the subject property.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>
<p><b>S-10.6: Stormwater Hydrology.</b> 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.</p>	<p>The Project would continue to allow flows to be directed to the Sweetwater River. As documented in the Project’s Hydrology Study (Chang 2021), the Project would not result in increased velocities or in increase in flow rates to off-site areas.</p>	<p>Post reclamation site conditions would consist of open space following a natural slope and drainage pattern, with native riparian vegetation. Thus, the reclaimed condition would not alter drainage patterns, increase velocities, or alter flow rates to off-site areas.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
<b>Noise Element</b>			
<p><b>N-1.2: Noise Management Strategies.</b> Require the following strategies as higher priorities than construction of conventional noise barriers where noise abatement is necessary:</p> <ul style="list-style-type: none"> <li>• Avoid placement of noise sensitive uses within noisy areas</li> <li>• Increase setbacks between</li> <li>• noise generators and noise sensitive uses</li> <li>• Orient buildings such that the noise sensitive portions of a project are shielded from noise sources</li> <li>• Use sound-attenuating architectural design and building features</li> <li>• Employ technologies when appropriate that reduce noise generation (i.e., alternative pavement materials on roadways)</li> </ul>	<p>The Project would employ a variety of design features, including using a conveyor belt rather than haul trucks for a majority of material hauling on site. Mitigation Measure NOI-1 requires that raw material extraction equipment operating within 400 feet of off-site NSLU useable space areas shall be located at the lowest feasible elevation within the Project’s excavation areas, which would be accomplished by performing initial at-grade excavation activities at least 400 feet from off-site NSLU useable space areas. Where noise abatement is necessary, berms may be used rather than conventional barriers to the extent feasible.</p>	<p>Post reclamation site activities would consist of open space, with multi-use trails that would support some recreational use of the property. No notable or consistent noise is expected to be generated by passive users of these trails. This policy is not applicable to the Project post-reclamation phase.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: NA</p>
<p><b>N-2.1: Development Impacts to Noise Sensitive Land Uses.</b> 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.</p>	<p>The Project has completed an acoustical study, as described in EIR Subchapter 2.4. All potential significant impacts to noise-sensitive land uses have been addressed. The Project would be required to implement noise attenuation as necessary to meet these compatibility standards at adjacent land uses.</p>	<p>Post reclamation, the Project site would consist of open space that would not generate noise that might affect either on-site (e.g., potential future users of the trails implemented by the Project) or off-site (e.g., proximate residential users).</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: NA/Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>COUNTY OF SAN DIEGO GENERAL PLAN</b>			
<p><b>N-6.2: Recurring Intermittent Noise.</b> Minimize impacts from noise in areas where recurring intermittent noise may not exceed the noise standards listed in Table N-2 but can have other adverse effects.</p>	<p>This policy guided development of the noise ordinance, which addresses specific noise generating sources. The Project would comply with noise standards listed in Table N-2. The Project does not propose equipment that would generate specific repetitive and intermittent noise such as a pile driver, or an equipment noise source that is not otherwise regulated. It is understood that some listeners may consider Project noise to be adverse, but this is considered to constitute “nuisance noise.”</p>	<p>Post reclamation site activities would consist of open space, with multi-use trails that would support some recreational use of the property. This policy is not applicable to the Project post-reclamation phase.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: NA</p>
<p><b>N-6.4: Hours of Construction.</b> Require development to limit the hours of operation as appropriate for non-emergency construction and maintenance, trash collection, and parking lot sweeper activity near noise sensitive land uses.</p>	<p>Project construction, mining, and reclamation activities would occur within the allowable hours of operation. Sand excavation and processing is proposed to occur Monday through Friday, between the hours of 7:00 a.m. and 5:00 p.m.</p>	<p>Post reclamation site activities would consist of open space, with multi-use trails that would support some recreational use of the property. This policy is not applicable to the Project post-reclamation phase.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: NA</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
<p><b>Community Character Goal:</b> Retain the unique balance of urban, semi-rural agricultural and open space land uses within the community, with open space and low-density buffers that separate the community from adjacent cities and unincorporated communities, while new development within the community conserves natural resources and topography.</p>	<p>The Project proposes to remove existing vegetation and golf course uses to conduct sand mining operations on 251 acres of an approximately 280-acre site. The remaining acreage that would not be mined would be subject to removal of invasive species or be left in their current condition. Implementation of the Proposed Project would transform existing recreational use and open spaces (i.e., the golf courses) into an extractive use operation that would operate over an approximately 10-year period. Following completion of the last subphase of mining, an additional two years would be required to fully implement the reclamation plan and bring on-site terrain to final elevations.</p> <p>During operations, the Project would install fencing with screening mesh and targeted landscaping to block views of the processing plant and mining activities from adjacent land uses and viewers. In addition, subphase areas disturbed by mining activities would be progressively reclaimed as mining moves to the</p>	<p>Post-reclamation, the Project site would be restored to an end use of open space, with multi-use trails that would support some recreational use of the property. Implementation of the proposed Reclamation Plan and placement of preserved, rehabilitated, and restored habitat into on-site open space, would ensure that the Project would be in conformance with this policy.</p>	<p>Mining and Reclamation: No</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	<p>next subphase, and reclaimed areas would typically be revegetated with plants from riparian or upland vegetation communities. While Project effects would be partially screened from select vantage points via screening mesh and shrubs and trees included in the landscape screening and entrances plan, and mined areas would be progressively reclaimed and revegetated, the Project entails the introduction of an extractive use that would be incongruous with the existing balance of urban, semi-rural agricultural and open space land uses within the community. Further, mining activities would create strong contrasts in form, line, and color that would degrade existing visual character.</p>		
<p><b>Community Character Policy 6:</b> Require landscaping, including trees, along all Mobility Element roads.</p>	<p>Willow Glen Drive and Steele Canyon Road are Major Roads identified in the Valle De Oro Mobility Element Network.</p> <p>The majority of existing screening tree removal along the northern boundary of the Project site and paralleling Willow Glen Drive would occur between Steele Canyon</p>	<p>While approximately 67 trees along Willow Glen Drive would be removed to accommodate the project, the landscape screening and entrance plan includes installation of new trees to provide additional screening, including within areas where trees would be removed (15-gallon and 24-inch box size). In the post-</p>	<p>Mining and Reclamation: No</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	<p>Road east to the existing golf course parking lot. Replacement trees included in the landscape screening and entrances plan would be planted prior to initiation of Phase 1 activities to provide visual screening of processing and mining activities from Willow Glen Drive. While several existing trees would be maintained to screen the processing plant, mining activities and related visual effects from view of road users, tree removal and replanting would alter the existing character of the corridor which is partially defined by the presence of mature screening trees.</p> <p>Steele Canyon Road bisects Phase 1 and Phase 2 areas on the Project site and spans the Sweetwater River corridor. The Project site borders Steele Canyon Road from Heatherwood Drive to Willow Glen Drive (approximately 0.30 mile). While a landscaping plan is not proposed along Steele Canyon Road, implementation of such a plan is not feasible where maximum visibility to project components and effects would occur (i.e., along the</p>	<p>reclamation scenario, new trees would be over ten feet high and while scale disparity with existing trees would be experienced, visual effects would not be significant. In addition, riparian and upland vegetation would be sequentially planted following the reclamation of mined subphase areas. The Project would be in conformance with this policy post reclamation.</p>	

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	<p>Sweetwater River Bridge segment). However, the planting of container trees in subphase 1A-1 areas to the west of the Steele Canyon Road just south of the bridge would enhance existing ornamental plantings in the area and partially screen subphases 1B and 1C activities from view. Further, existing on-site vegetation would be retained until just prior to the initiation of mining activities in the subphase area. Lastly, reclaimed subphase areas would be progressively revegetated with fast to slow growing riparian and upland container trees and shrubs, and seed mixtures. Over time (i.e., within approximately 7 to 14 years post-initiation of subphase 1A, container trees and shrubs, and seed mixtures in subphases 1A-1, 1A, 1C, and 2A may reach maturity.</p> <p>While the Project would implement a Landscape Screening and Entrances Plan to provide for replacement of existing landscaping adjacent to the Project entrances and additional screening of the processing plant area from Willow Glen Drive, the Project would not</p>		

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	implement a formal landscape plan for non-river corridor segments of Steele Canyon Road that parallel the Project site.		
<b>Land Use Element</b>			
<p><b>Land Use Industrial Goal:</b> Provide for the kind of industrial development that does not detract from the existing character of the community.</p>	<p>The Project would introduce a phased mining operation, including reclamation and revegetation of disturbed areas, to the visual environment of the Valle De Oro community. The Proposed Project would alter the quality and composition of the Project site through the phased removal of vegetation and exposure of underlying soils, introduction of mining operations, equipment, and vehicles, a processing plant facility, and stockpiles that would create strong contrast with existing features. As proposed, the Project would create notable physical changes in the composition of the visual environment and this change would be experienced from Willow Glen Drive, Steele Canyon Road, and surrounding recreational and residential areas. Due to anticipated visual contrast and the duration of mining and reclamation activities, the proposed extraction operation</p>	<p>Under post-reclamation conditions, high quality native riparian and upland habitat would be established on site, and upon maturity, Project effects would be diminished such that the enhancement of the existing Sweetwater River corridor with riparian and upland vegetation communities on the Project site would improve upon the existing character and quality of the Project site. Once vegetation is mature, the Project would be in conformance with this policy post reclamation.</p>	<p>Mining and Reclamation: No</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	would detract from the existing character of the community and would conflict with this policy.		
<p><b>Industrial Policy 3:</b> All industrial activities shall provide buffering or screening when located adjacent to residential areas.</p>	<p>Existing on-site landscaping and mature trees along Willow Glen Drive and the southern boundary of the Project site would be generally maintained as part of the Proposed Project to provide vegetative screening for adjacent residences. As previously stated, approximately 67 existing screening trees would be required to be removed to construct Project entrances and accommodate improvements to Willow Glen Drive. The Project would implement a Conceptual Landscape Screening and Entrances Plan to provide landscaping adjacent to the Project entrances and additional screening of the plant area and parking lot from Willow Glen Drive.</p> <p>The Project’s plot plan incorporates buffering of nearby residential areas via subphase area setbacks from the Project boundary. Subphase boundaries would not be located directly adjacent to residential properties. Further, existing landscape features (including trees)</p>	<p>No industrial activities would occur post reclamation. Riparian and upland vegetation installed following landform reclamation would mature over a period of five to seven years post-installation and would diminish/screen the visual effects of mining and reclamation activities.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	between subphase boundaries and the nearest residential properties would be retained during Project operations.		
<p><b>Industrial Policy 4:</b> Require strict regulation of all extraction industries to minimize dust, noise, traffic, unsightly views, undesirable accumulation of water, and safety and health hazards.</p>	<p>Although the requirement for the County to strictly regulate extraction industries is a County obligation beyond the power of an individual project to ensure, as described in EIR Chapters 1.0, 2.0, and 3.0, the Proposed Project would be subject to applicable County regulations for minimizing dust, noise, traffic, unsightly views, undesirable accumulation of water, and safety and health hazards during mining and reclamation. However, as documented in Subchapter 2.1, unsightly views of mining activities and related visual effects would be experienced from public vantage points in the surrounding area. Available views to the project site would be minimized to the extent feasible through the maintenance of existing screening trees, planting of new landscaping, phased mining, progressive revegetation of mined areas, and installation of mesh screening on fencing.</p>	<p>Post reclamation, no extraction would occur, and the no activities occurring within the rehabilitated open space would result in dust, noise, traffic, unsightly views, undesirable accumulation of water, and/or safety and health hazards that would require such regulatory conformance.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: NA</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
<p><b>Industrial Policy 5:</b> Require specific guidelines for extraction operations and rehabilitation of the landscape.</p>	<p>Although the requirement for the County to prepare specific guidelines for extraction operations and landscape rehabilitation is a County obligation beyond the power of an individual project to ensure, the Project would comply with applicable County guidelines for these actions. The Project would include approval of a Major Use Permit to allow mining activities, as well as a Reclamation Plan to specify the standards to which the site must be reclaimed upon completion of mining activities in accordance with the California Surface Mining and Reclamation Act of 1975. The Project includes the implementation of a revegetation plan to ensure that mined and reclaimed areas are revegetated with appropriate native species. The Revegetation Plan is subject to the approval of the County.</p>	<p>Post reclamation, no activities are proposed that would require conformance with County guidelines for extraction operations and rehabilitation of the landscape.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: NA</p>
<p><b>Industrial Policy 6:</b> Support strict regulation of all extraction industries to ensure proper rehabilitation of the landscape.</p>	<p>Please see Land Use – Industrial Policy 5, above. In this instance, the compliance of the Project with the County’s (and state’s) regulations regarding mining and reclamation would support the County’s regulations.</p>	<p>Please see Land Use – Industrial Policy 5, above.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: NA</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
<p><b>Open Space Policy 4:</b> Limit land uses in areas where natural hazards exist to very low residential densities, agriculture, or recreation.</p>	<p>The purpose of this policy is to restrict locating large numbers of people into locations with potentially hazardous natural conditions. The Project does not propose any change to land use designations, as mineral extraction is allowable under the current designations. The Project does not propose placing land uses with large numbers of people in areas that might flood due to the presence of the Sweetwater River.</p>	<p>Post reclamation, the only on-site land use proposed by the Project is open space, and the low-intensity recreational uses supported by multi-use trails constructed on the property. Recreational uses are expressly permitted in the policy.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>
<p><b>Open Space Policy 5:</b> Utilize open space as a buffer between incompatible land uses.</p>	<p>Appropriate setbacks would be established from the property line, and existing and proposed vegetation would be used to provide buffering screening of the Project site from adjacent residential areas, and, at the western extent of the property, from the SDNWR. Approximately 33 acres of the Project site, primarily located along the southern property boundary, would not be disturbed during mining and reclamation, providing a buffer between the short-term operational activities and the existing off-site land uses and ensuring conformance with these policies.</p>	<p>Post reclamation, the Project site would actually consist of open space (as opposed to constituting a buffer). This use would be compatible with surrounding land uses (residential and open space).</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
<b>Open Space Policy 6:</b> Buffer industrial and commercial land uses from surrounding residential uses.	See Open Space Policy 5, above.	See Open Space Policy 5, above.	Mining and Reclamation: Yes  Post Reclamation: Yes
<b>Open Space Policy 7:</b> 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.	As noted above, approximately 23 percent of the Project site (66 acres) would not be mined. These areas would be subject to removal of exotic and invasive species, riparian habitat restoration, or left in their existing condition. Only 1.63 acres of sensitive habitat would be disturbed during mining and reclamation activities; the remainder of the site that is proposed for mining is characterized as developed/disturbed. Areas disturbed by resource extraction would be progressively reclaimed to open space as mining proceeds. As part of the Reclamation Plan, the Project would create new on-site trails that would be accessible by the public and local residents. On-site restored biological open space required for biological mitigation would be dedicated for preservation <i>in perpetuity</i> . Implementation of the	Post-reclamation, the site would retain the end use of open space and, in limited areas, multi-use trail elements that have been dedicated to public use.	Mining and Reclamation: Yes  Post Reclamation: Yes

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	proposed Reclamation Plan and placement of approximately 125.4 acres of preserved, rehabilitated, and restored habitat into on-site open space would ensure that the Project would be in conformance with these policies.		
<b>Open Space Policy 9.</b> Encourage the preservation of open space areas in which potential natural hazards exist (flood plains, fault lines, mudslides, etc.).	The site contains the Sweetwater River drainage. The existing low-flow channel would not be impacted by mining activities. Following cessation of mining activities, the area would be returned to open space and multi-use trails. Biological open space areas and the trails would be dedicated for permanent preservation.	Post-reclamation, the site would retain the end use of open space and, in limited areas, multi-use trail elements dedicated to public use.	Mining and Reclamation: Yes  Post Reclamation: Yes
<b>Open Space Policy 11.</b> Areas to be preserved as natural open space shall be included in open space easements.	Please see Open Space Policies 7, 8, and 9, above.	Please see Open Space Policies 7, 8, and 9, above.	Mining and Reclamation: Yes  Post Reclamation: Yes
<b>Community Design Policy 2.</b> Mature trees, shrubs, and significant landforms should be conserved in all public and private development projects.	The Project site is primarily comprised of a golf course characterized by ornamental landscaping, with few areas of the site that contain notable tree copses or large areas of sensitive vegetation requiring conservation. Trees and	As noted in the mining and reclamation phase discussion, there are no significant landforms on site. Implementation of the proposed Reclamation Plan and placement of approximately 125.4 acres of preserved, rehabilitated,	Mining and Reclamation: Yes  Post Reclamation: Yes

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	<p>shrubs located along the property boundary would be retained to the extent feasible to serve as shielding vegetation during mining activities. While approximately 67 trees (or 14 percent of the existing trees along Willow Glen Drive) would be removed to construct the Project entrance and Willow Glen Drive improvements, replacement trees would be planted prior to initiation of Phase 1 to provide visual screening. Ornamental mature trees and shrubs would be removed during the mining phase of the Project. The Proposed Project would result in impacts to approximately 0.32 acre of southern cottonwood-willow riparian forest located in the southwestern portion of the site. Impacts to riparian forest would be limited to the perimeter of existing habitat and are required to maintain proper drainage of the expanded Sweetwater River floodplain and prevent ponding and erosion where the widened floodplain meets existing riparian habitat within the project site and SDNWR. The impacted area would be restored with native riparian habitat</p>	<p>and restored habitat into on-site open space would ensure that the Project would be in conformance with this policy.</p>	

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	<p>following Project activities as part of site reclamation and Project’s proposed mitigation. The proposed Reclamation Plan would include riparian and upland plant palettes that would establish native vegetation on site. Overall, the Project would be in compliance with this policy.</p> <p>The Project is located within the floodplain of the Sweetwater River, which flows in a northeast to southwest direction through the site. Elevations range from approximately 320 feet above mean sea level (amsl) to 380 feet amsl; no significant landforms requiring conservation occur on site. It is noted, however, that mining and reclamation-period buffers would preclude impacts to the river channel during this phase.</p>		
<p><b>Community Design Policy 6:</b> Encourage the maintenance of all private property, including prompt disposal of trash and abandoned vehicles.</p>	<p>The Project would address mine maintenance, including disposal of trash, during mining operations and reclamation. It is not anticipated that abandoned vehicles would be left at the site due to property fencing and active operations, but if such should occur, they would also be removed.</p>	<p>On-site trails would be dedicated to the County and periodically maintained per County trail standards.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
<p><b>Rancho San Diego Specific Plan:</b> Continuing development of the Specific Plan area shall be developed under conditions A-E. See Valle de Oro Community Plan.</p>	<p>Two parcels in the southwestern portion of the Project site are included in the Specific Plan area, totaling approximately 32 acres – Assessor Parcel Numbers 506-021-19-00 (8.2 acres) and 519-011-03-00 (23.8 acres). These areas were incorporated into the Specific Plan area as an extension of the Cottonwood Golf Club in order to replace the fairways affected by the Steele Canyon Road bridge over the Sweetwater River (County 2013b). Only the 32-acre portion of the site located within the Specific Plan area is subject to the provisions of the Specific Plan. Relevant policies are addressed below.</p>	<p>Please see discussion under the Mining and Reclamation Phase.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>
<p><b>Rancho San Diego Specific Plan – Conservation D.1:</b> 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.</p>	<p>The portion of the Project site that is subject to the Rancho San Diego Specific Plan, which is also located within the County-designated Sweetwater River Floodplain (RCA 77), would be retained in open space. Activities during mining and reclamation would be limited to channel improvements and removal of non-native vegetation. Natural resources existing within this area would be conserved, and the Project</p>	<p>The portion of the site subject to the Rancho San Diego Specific Plan would be retained in open space. Natural resources existing within this area would be conserved.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	would be in conformance with this policy.		
<b>Rancho San Diego Specific Plan – Conservation D.2:</b> A system of open space, and recreation areas providing linkages, trails, and buffers within the specific planning areas shall be provided and protected.	No mining would occur within the area subject to the Specific Plan. Activities during mining and reclamation would be limited to channel improvements and removal of non-native vegetation, which would enhance the values of this area.	The portion of the site subject to the Rancho San Diego Specific Plan would be retained in open space. Natural resources existing within this area would be conserved. To provide protection for sensitive biological resources, no trails are proposed in this area.	Mining and Reclamation: Yes Post Reclamation: Yes
<b>Rancho San Diego Specific Plan – Conservation D.5:</b> 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 Project site is relatively level, with slopes in excess of 10 percent limited to slopes associated with the channelized Sweetwater River east of Steele Canyon Road. Mining activities would be set back a minimum of five feet on each side of the channel, such that no slopes exceeding 10 percent slope would be impacted by the Project.	Post reclamation, the site would retain the end use of open space with no uses that would result in disturbance of slopes.	Mining and Reclamation: Yes Post Reclamation: Yes
<b>Mobility Element</b>			
<b>Mobility Policy 4:</b> Require design of all road improvements that maximizes environmental and aesthetic considerations consistent with safety needs.	Vehicles to and from the project site would utilize existing roadways during non-peak hours. The Project proposes improvements to Willow Glen Drive between Steele Canyon Road and the Project egress driveway, including restriping Willow Glen Drive between Steele Canyon Road and the Project ingress driveway to provide Class II	No additional roadway improvements would be made post reclamation.	Mining and Reclamation: Yes Post Reclamation: Yes

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	<p>buffered bicycle lanes on both sides of the roadway; construction of a dedicated right-turn lane into the primary Project ingress; and construction of a two-way left-turn lane between the driveways, which would serve as a refuge lane for trucks to complete their outbound maneuver as they are exiting the site. A new egress point would be established in the approximate center of the existing parking lot. Landscaping along Willow Glen Drive is also proposed to provide aesthetic screening. No roadway hazards would result from these improvements and no adverse design features/physical configurations or other conflicting features that may adversely affect the safe movement of roadway users are proposed or present in the Project vicinity. Intersection sight distance (line of sight) per County Public Road Standards 6.1.E would be met.</p>		
<p><b>Mobility Policy 5:</b> Where practical, landscaping shall be provided within the right-of-way of major roads and prime arterials.</p>	<p>Willow Glen Drive is identified as a Major Road in the County General Plan Valle de Oro Mobility Plan Network. The majority of Project-proposed landscaping along the road would be located outside of the</p>	<p>No additional landscaping would be installed post reclamation.</p>	<p>Mining and Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	right-of-way due to limited space; however, a coastal sage scrub seed mix would extend into the right-of-way at the new Project access point opposite Muirfield Drive.		Post Reclamation: Yes
<b>Mobility Policy 6:</b> Require landscaping, including trees, along private property frontage of all Mobility Element roads wherever possible.	Existing trees along Willow Glen Drive would be maintained to the extent feasible to provide screening. While approximately 67 trees (or 14 percent of the total existing trees along Willow Glen Drive) would be removed to construct the Project entrance and Willow Glen Drive improvements, replacement trees would be planted prior to initiation of Phase 1 to provide visual screening. Additional landscaping would be provided adjacent to new private access points.	Post reclamation, the site would be returned to native vegetation.	Mining and Reclamation: Yes  Post Reclamation: Yes
<b>Mobility Policy 11:</b> Eliminate safety hazards caused by direct access of traffic onto major arterial or collector streets when reviewing projects along such streets.	Please see Mobility Policy 4, above.	Please see Mobility Policy 4, above.	Mining and Reclamation: Yes  Post Reclamation: Yes
<b>Mobility Policy 14:</b> Encourage the creation of a system of non-motorized recreational trails to connect	During reclamation portions of this phase, areas proposed for future open space set aside, trail use, etc., would be filled/graded and	The approximately multi-use trails completed by the Project would be retained, supporting an overall system of non-motorized	Mining and Reclamation: Yes

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
appropriate recreational facilities and to integrate this system with existing and proposed trails within the San Diego region.	revegetated as appropriate. The reclaimed areas would include the 5-foot-wide trail through the site and tying into other planned and existing trail features, supporting an overall system of non-motorized recreational trails within the region.	recreational trails within the region.	Post Reclamation: Yes
<b>Conservation Element</b>			
<b>Conservation – Water Resources Policy 3:</b> Encourage the strict regulation of the uses of water bodies within the planning area to ensure that such uses are compatible with existing ecosystems.	The Project would be subject to applicable regulation and permits (from the County, CDFW, USACE and RWQCB) during mining and reclamation.	Post reclamation, the Project site would retain the end use of open space and, in limited areas, multi-use trail elements that have been dedicated to public use. These uses would be compatible with the existing natural ecosystems.	Mining and Reclamation: Yes  Post Reclamation: Yes
<b>Conservation – Water Resources Policy 6:</b> Provide safe and efficient disposal of urban storm runoff to protect the Sweetwater Reservoir and floodplain areas of the Sweetwater River.	Project effects would be temporary rather than permanent, and would not require large areas of impermeable surface. Although the proposed actions would not result in urban runoff, it is noted that the Project would include de-siltation basins that would prevent sediment from leaving the site while allowing water to pass through to existing drainage features. Mining and reclamation grading would direct runoff from the disturbed areas towards the basins. The existing Sweetwater River channel would be avoided and silt fences would be	Post reclamation, the site would contain multi-use trails and revegetated open space. These are not urban uses and potential runoff would not contaminate the reservoir or groundwater supplies.	Mining and Reclamation: Yes  Post Reclamation: Yes

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	<p>installed 5 feet from the outer edge of each side of the channel. Operations would implement erosion control measures in accordance with set criteria to reduce on- and off-site erosion. These measures include monitoring soil movement, arresting gullies or rills using straw mulch and hay bales, and installing silt fencing, compacting soils with equipment, and re-grading, as necessary. Measures to avoid contamination from equipment operations and maintenance also would be enforced.</p>		
<p><b>Conservation – Water Resources Policy 7:</b> Protect existing groundwater reserves for potential emergency use.</p>	<p>Both existing and Project-related water draw would come from on-site groundwater resources. The Project would require substantially less water use than the golf courses require under existing conditions.</p>	<p>Post reclamation, the site would be left in open space, with no Project-related water draw. Groundwater reserves for potential emergency use would not be affected by the Project and would be improved over existing conditions.</p>	<p>Mining and Reclamation: Yes  Post Reclamation: Yes</p>
<p><b>Conservation – Water Resources Policy 8:</b> 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.</p>	<p>The temporary on-site mining and reclamation actions would be subject to, and comply with, water quality regulations as described in EIR Chapter 1.0. Conformance with mandatory regulations result in</p>	<p>Post reclamation, the site would contain multi-use trails and revegetated open space. Significant impacts to groundwater deposits and flows are not expected from these passive uses.</p>	<p>Mining and Reclamation: Yes  Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	compliance with this policy.		
<p><b>Conservation – Water Resources Policy 9:</b> 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.</p>	<p>The temporary mining and reclamation efforts associated with the Project are subject to regulation by the County, state, and federal agencies relative to water volume and quality, as appropriate, and would continue to be so. The Project would be subject to applicable regulation and permits (from the County, CDFW, USACE, and RWQCB) during mining and reclamation to ensure that groundwater deposits and flows are not contaminated by the industrial activity, and would be in conformance with this policy.</p>	<p>Post reclamation, the site would contain multi-use trails and revegetated open space. Significant contamination impacts to groundwater in the Sweetwater River Area deposits and flows would not result from these passive uses.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>
<p><b>Conservation – Water Resources Policy 12:</b> Control urban runoff in the Sweetwater River basin in order to protect Sweetwater Reservoir and groundwater supplies from contamination.</p>	<p>Project effects would be temporary rather than permanent and would not require large areas of impermeable surface. Although the proposed actions would not result in urban runoff, it is noted that the Project would include de-siltation basins that would prevent sediment from leaving the site while allowing water to pass through to existing drainage features. Mining and reclamation grading would direct runoff from the disturbed areas towards the basins.</p>	<p>Post reclamation, the site would contain multi-use trails and revegetated open space. These are not urban uses and potential runoff would not contaminate the reservoir or groundwater supplies.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	<p>The existing Sweetwater River channel would be avoided and silt fences would be installed 5 feet from the outer edge of each side of the channel. Operations would implement erosion control measures in accordance with set criteria to reduce on- and off-site erosion. These measures include monitoring soil movement, arresting gullies or rills using straw mulch and hay bales, and installing silt fencing, compacting soils with equipment, and re-grading, as necessary. Measures to avoid contamination from equipment operations and maintenance also would be enforced.</p>		
<p><b>Conservation – Water Resources Policy 13:</b> 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.</p>	<p>The purpose of this policy is to restrict permanently locating people into locations with potential hazardous natural conditions such as flooding. The Project does not propose any change to land use designations, and does not propose placing land uses with large numbers of people in areas that might flood due to the presence of the Sweetwater River. After the short-term mining, reclamation</p>	<p>Post reclamation, the only on-site land use proposed by the Project is open space, incorporating the low-intensity multi-use trails. Recreation and trail uses are expressly permitted in the policy.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	would revegetate the property and install trails through the site.		
<p><b>Conservation – Vegetation and Wildlife Habitats Policy 16:</b> Require use of native species for landscaping where practical for public projects and private projects.</p>	<p>Project reclamation by sub-phase would include installation of native vegetation. Plants used in landscaping near the Project entryway also would be natives. Trees would include coast live oak (<i>Quercus agrifolia</i>), Fremont cottonwood (<i>Populus fremontii</i>), and Western redbud (<i>Cercis occidentalis</i>). Additional plants to be employed include shrubs (California lilac [<i>Ceanothus</i> x ‘Ray Hartman’], toyon [<i>Heteromeles arbutifolia</i>], lemonade berry [<i>Rhus integrifolia</i>], and California wild grape [<i>Vitis californica</i>]), groundcovers (dwarf coyote bush [<i>Baccharis pilularis</i>], and a coastal sage scrub seed mix.</p>	<p>Post reclamation, the site would be entirely vegetated with native species.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>
<p><b>Conservation – Vegetation and Wildlife Habitats Policy 18:</b> Conserve unique functional plant and wildlife habitats, particularly those supporting rare, endangered, or threatened or depleted species.</p>	<p>Although the Project largely would be sited on disturbed golf course, it would conserve the majority of extant native habitat on site, including the larger area of habitat located at the western extent of the property and adjacent to the SDNWR.</p>	<p>Post reclamation, the site would retain the end use of open space and, in limited areas, multi-use trail elements. These uses would not conflict with conservation of unique functional habitats, and could support their conservation by retaining abutting similar habitat.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
<p><b>Conservation – Vegetation and Wildlife Habitats Policy 20:</b> Encourage the maintenance and enhancement of functional plant and wildlife habitats for threatened and endangered species.</p>	<p>Please see Wildlife Habitats Policy 18, above.</p>	<p>Please see Wildlife Habitats Policy 18, above.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>
<p><b>Conservation – Vegetation and Wildlife Habitats Policy 21:</b> Protect wildlife refuge areas from noise impacts, outdoor lighting impacts, and pollution impacts from stormwater runoff.</p>	<p>The Biological Resources Technical Report identified potentially significant noise impacts to upland and riparian birds. Mitigation is proposed that would lower impacts to less than significant levels. Proposed safety lighting would be associated with processing areas, and designed to adhere to the County LPC. This would minimize adverse impacts to wildlife in general. Specific to refuge areas, however, mining activities would be buffered from the SDNWR by existing vegetation. Project lighting would be both shielded and directed downward to minimize spill into adjacent areas.</p> <p>The Project would include de-siltation basins that would prevent sediment from leaving the site while allowing water to pass through to existing drainage features. Mining</p>	<p>Post-reclamation, the site would retain the end use of open space and, in limited areas, multi-use trail elements. Noise from intermittent/sporadic of use of on-site trails would not substantially affect animals/birds within the SDNWR (where trails are also located). No lighting is proposed as part of Project reclamation, and there would be no associated impacts. Post reclamation site activities would consist of open space reconstructed on a site following a natural slope and drainage pattern very similar to existing conditions. The natural vegetation installed and established during reclamation would stabilize the surface and minimize erosion. The lack of impervious surfaces would allow stormwater to naturally follow existing drainage patterns, and</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	<p>and reclamation grading would direct runoff from the disturbed areas towards the basins. The existing Sweetwater River channel would be avoided and silt fences would be installed 5 feet from the outer edge of each side of the channel. Operations would implement erosion control measures in accordance with set criteria to reduce on- and off-site erosion. These measures include monitoring soil movement, arresting gullies or rills using straw much and hay bales, and installing silt fencing, compacting soils with equipment, and re-grading, as necessary. The mitigation and Project design features would ensure conformance with this policy.</p>	<p>would minimize pollution impacts from stormwater runoff.</p>	
<p><b>Conservation – Soil and Minerals Policy 23:</b> Encourage strict standards to limit soil erosion and identify problem areas.</p>	<p>Mining and reclamation grading would direct runoff from the disturbed areas towards the desiltation basins. Operations would implement erosion control measures in accordance with set criteria to reduce on- and off-site erosion. These measures include monitoring soil movement, arresting gullies or rills using straw much and hay bales, and installing silt fencing,</p>	<p>Post reclamation, the site would consist of open space with multi-use trails (consistent with the OS-R designation). As noted in EIR Chapter 1.0, all areas disturbed by Project activities would be planted or hydroseeded to aid in soil stabilization and erosion control, and erosion would be minimal.</p>	<p>Mining and Reclamation: Yes  Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	compacting soils with equipment, and re-grading, as necessary.		
<p><b>Conservation – Night Sky Protection Policy 24:</b> All outdoor lighting fixtures shall be shaded on top so that all light will shine downward.</p>	<p>Proposed safety lighting would be designed to adhere to the County LPC; lighting would be shielded to direct light downward. Thus, the Project would be in conformance with this policy.</p>	<p>No lighting is proposed as part of Project reclamation.</p>	<p>Mining and Reclamation: Yes  Post Reclamation: NA/Yes</p>
<p><b>Conservation – Air Quality Policy 28:</b> Encourage the identification and reduction of sources of air pollution affecting Valle de Oro.</p>	<p>Project-related air pollution sources (dust and other emissions) have been identified and reduced through Project design. As described in the Air Quality Technical Report and EIR Chapter 1.0, the Project has incorporated BMPs to reduce fugitive dust consistent with SDAPCD Rule 55 – during construction and mine operation and reclamation. In addition, dust would be controlled in the sand processing and washing facilities using BACT, primarily the application of sufficient water to eliminate visible emissions. Diesel exhaust emissions from on- and off- road equipment would be required to implement BACT for reduction of exhaust PM, involving replacement of older equipment with equipment meeting the USEPA Tier-4 specifications or</p>	<p>Post reclamation, the site would constitute revegetated open space, with some trail uses. No pollution-generating sources would occur, and this policy is not applicable to the post-reclamation phase.</p>	<p>Mining and Reclamation: Yes  Post Reclamation: NA/Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	retrofitting equipment with diesel particulate filters, in accordance with CARB regulations and implementation schedules.		
<b>Conservation – Air Quality Policy 29:</b> Discourage new sources of air pollution in the Valle de Oro area.	Please see Conservation – Air Quality Policy 28.	Please see Conservation – Air Quality Policy 28.	Mining and Reclamation: Yes  Post Reclamation: NA/Yes
<b>Conservation – Air Quality Policy 30:</b> 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.	As described in the Project Air Quality Technical Report, the Project would be consistent with the General Plan, the Valle De Oro Community Plan, and the Rancho San Diego Specific Plan and consistent with the growth projections from those plans used in development of the RAQS. The truck trips from the Project site also would be reallocated truck trips from other mines that are located further away, and would reduce VMT.	Please see Conservation – Air Quality Policy 28 and the Mining and Reclamation Phase response for this issue.	Mining and Reclamation: Yes  Post Reclamation: Yes

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
<b>Scenic Highways Element</b>			
<p><b>Scenic Highways Policy 1:</b> Support the protection of the scenic highway corridors in Valle de Oro as designated in the County General Plan.</p>	<p>The Valle de Oro Community Plan identifies Willow Glen Drive as a unique and important scenic highway corridor. While approximately 67 trees (or 14 percent of the existing trees along Willow Glen Drive) would be removed to construct the Project entrance and Willow Glen Drive improvements, replacement trees would be planted prior to initiation of Phase 1 to provide visual screening. The Project also proposes to implement a landscape screening and entrances plan to aid in the screening of the processing plant and mining activities from road users. Further, six-foot-high, chain link security fencing is proposed to be installed along the property boundary with Willow Glen Drive and would block views of Project components and visual effects. While Project components and contrasts would be screened from view near the processing plant, new fencing and mesh screening would restrict available views and reduce visual quality along the Willow Drive corridor. Views towards the</p>	<p>Long-term changes within the Project site post reclamation would contribute positively to the valued views experienced along Willow Glen Drive. At maturity (approximately five to seven years post installation), trees and shrubs of the revegetation plan would improve the visual character of the Project site. Visual quality and particularly, intactness and unity, would also be improved with mature vegetation that the cover the sub-phase areas. Scenic views experienced along the segment of the roadway bordering the Project site would be an extension of the continuous pattern elements of the surrounding visual environment within the river valley.</p>	<p>Mining and Reclamation: No</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	<p>Project site along the along the approximately 0.14-mile-long parking lot frontage of Willow Glen Drive are limited in length by mature landscaping installed near the clubhouse. However, visual change on the Project site and seen landscape experienced from Willow Glen Drive would be notable, strong, and perceived negatively. Thus, the Project would not protect and enhance the appearance of the scenic landscape experience from Willow Glen Drive.</p>		
<p><b>Scenic Highways Policy 2:</b> 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.</p>	<p>The only scenic corridor in proximity to the Project site is Willow Glen Drive. Please see Scenic Highways Policy 1, above.</p>	<p>Please see Scenic Highways Policy 1, above.</p>	<p>Mining and Reclamation: No</p> <p>Post Reclamation: Yes</p>
<b>Public Safety Element</b>			
<p><b>Public Safety Policy 6:</b> Encourage the use of natural drainage areas and streambeds as flood control protection, thereby improving groundwater recharging.</p>	<p>During mining, the existing river channel would be protected by silt fencing, retaining its current flow volume/recharge capacity, and sediment basins would trap and slow on-site runoff, allowing for some additional incremental recharge. The existing Sweetwater River channel traversing the site would be</p>	<p>Post reclamation, the site would constitute revegetated open space with multi-use trails. The drainage would flow freely and contain riparian vegetation, which would slow flooding, supporting groundwater discharge.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	maintained, would be widened to an average width of 250 to 300 feet, and would continue to flow into the Sweetwater River. These improvements would continue to use the overall natural drainage pattern allowing for groundwater recharge.		
<b>Noise Element</b>			
<b>Noise Policy 2:</b> Require site design and building design controls to minimize noise emissions from noise sources.	The site would be temporarily used for mining activities, with equipment usage that would generate sound. All Project noise would be mitigated to less than significant levels, as described in EIR Subchapter 2.4.	Post reclamation, the site would constitute revegetated open space, with multi-use trails. No noise requiring design control is anticipated from recreational trail users.	Mining and Reclamation: Yes  Post Reclamation: NA/Yes
<b>Noise Policy 3:</b> Encourage land use and circulation patterns which will minimize noise in residential neighborhoods and sensitive wildlife habitat.	Please refer to Noise Policy 2.	Post reclamation, the site would constitute revegetated open space, with multi-use trails. Noise from recreational trail users is expected to be minimal, sporadic, and restricted to daytime hours, minimizing potential effects on either nearby residential neighborhoods or habitat containing sensitive wildlife.	Mining and Reclamation: Yes  Post Reclamation: Yes

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
<b><i>Rancho San Diego Specific Plan</i></b>			
<p><b>Goal:</b> Protect unique plant, wildlife, and cultural resources from destruction or incompatible adjacent uses.</p>	<p>No mining would occur within the area subject to the Specific Plan. Activities during mining and reclamation would be limited to channel improvements and removal of non-native vegetation, which would enhance the values of this area. The Project identifies on-site USFWS-designated critical habitat for San Diego ambrosia (a unique plant), coastal California gnatcatcher, and least Bell’s vireo, and provides protection for these areas. Beyond avoidance and protection of critical habitat, the Project identifies specific mitigation for potential significant (primarily indirect) impacts that would mitigate such impacts, should they occur, to less than significant levels, in EIR Section 2.2.5.</p>	<p>The portion of the site subject to the Rancho San Diego Specific Plan would be retained in open space. Natural resources existing within this area would be conserved. To provide protection for sensitive biological resources, no trails are proposed in this area.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>
<p><b>Objective 4.2:</b> 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.</p>	<p>Although regulation of land uses is beyond the purview of a Project applicant, it is noted that the site contains portions of RCA 77 (Sweetwater River Floodplain). Substantial areas within the on-site portion of the RCA are currently in golf course and do not contain sensitive resources. As part of</p>	<p>Post reclamation, the site would constitute revegetated open space, including improved drainage and riparian habitat, with multi-use trails (outside of the Rancho San Diego Specific Plan). This would be an improved condition and more valuable RCA than under existing conditions.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	<p>reclamation, approximately 110.5 acres of additional wetland/riparian habitat would be installed, increasing both sensitive habitat and the potential for associated sensitive species inhabiting such habitat. The Project would improve conditions over the existing condition.</p>		
<p><b>Objective 4.6:</b> Protect riparian habitat used by Least Bell’s vireo from incompatible adjacent development and identify agencies or organization which could maintain habitat.</p>	<p>Approximately 10.42 acres of critical habitat for the least Bell’s vireo occur in the southwestern portion of the Project site, which would be protected from disturbance/removal during the short-term mining on site. The Project would result in impacts to 1.14 acres of least Bell’s vireo critical habitat, consisting of 0.16 acre of southern cottonwood-willow riparian forest, 0.78 acre of disturbed habitat, 0.20 acre of developed land associated with golf course development. All impacted areas would be restored with native riparian habitat following Project activities as part of site reclamation and the Project’s proposed mitigation</p> <p>Riparian habitat would increase by approximately 110.7 acres during</p>	<p>No “incompatible adjacent development” is proposed. On-site biological open space would be preserved and managed in perpetuity. Ownership would be transferred to a public or private non-profit entity to ensure that this occurs.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	the reclamation phase, which would be conserved in perpetuity through a restrictive easement.		
<p><b>Objective 4.7:</b> Identify and protect Black-tailed gnatcatcher nesting areas in a natural condition appropriately buffered from adjacent development.</p>	<p>The Project site is within distribution area of the coastal California gnatcatcher (distinguished from the more broadly located black-tailed gnatcatcher in the late 1980s). Two small patches of suitable coastal sage scrub habitat occur within the extreme southwestern and southeastern portions of the site. These patches are contiguous with other coastal sage scrub habitat present within preserved lands, open space areas, or undeveloped habitat. A female gnatcatcher was observed foraging with and feeding one fledgling in coastal sage scrub at the Project’s southwestern boundary on June 11, 2019. Additional observations of the species include a single juvenile calling within the riparian habitat along Sweetwater River in the southwestern portion of the site on July 1, 2019, and another female/juvenile type foraging in the same general area on July 17, 2019. Appropriate mitigation measures have been incorporated to reduce</p>	<p>Post reclamation, the site would constitute revegetated open space, with multi-use trails (outside of the Rancho San Diego Specific Plan). No “developed areas” are proposed that would require buffering.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: NA/Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	potential impacts to the species to a level below significant (see EIR Section 2.2.5).		
<p><b>Goal:</b> Maximize leisure-time opportunities with both natural parks and improved recreation facilities which will encourage active lifestyles for residents of all ages.</p>	<p>During short-term mining activities, the Project would eliminate on-site private (for pay) golfing activities, which provides recreational opportunity for some users. An immediately adjacent golf course (Steele Canyon Golf Club) has greens located within approximately 0.1 mile of the eastern Ivanhoe Course, which would continue to provide golfing opportunities in the vicinity. Following mining, the reclamation phase of the Project (Phase 4) would revegetate open space and construct trails. This would provide publicly available passive recreational opportunity to all potential users and would support active lifestyles.</p>	<p>Post reclamation, the site would constitute revegetated open space, with multi-use trails. Available trails in an enhanced natural setting open to the public would support active lifestyles. To protect sensitive biological resources, these trails would not extend into the portion of the site subject to the Rancho San Diego Specific Plan.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>
<p><b>Goal:</b> Open Space areas shall be maintained so as to enhance the overall scenic quality and protect the landform integrity of Rancho San Diego.</p>	<p>No unique topographical features, designated historic resources, or prominent rock outcroppings or ridgelines occur on site. The Project is, however, located in a river valley surrounded by prominent scenic features including hillsides, ridgelines, and mountainous terrain. The Project would not affect any of</p>	<p>Post reclamation, the site would contribute positively to scenic quality through retention and enhancement of riparian vegetation.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>

Policy	Mining and Reclamation Phase	Post-Reclamation	Consistent?
<b>VALLE DE ORO COMMUNITY PLAN</b>			
	<p>these features. Mining and reclamation-period buffers would preclude impacts to the river channel during this phase. In particular, activities in the portion of the site subject to the Rancho San Diego Specific Plan would be limited to river channel improvements and removal of invasive species. Thus, the scenic qualities of this area would be protected.</p>		
<p><b>Objective 7.2:</b> Open space maintenance could be determined at the time of adjacent implementing permit action. Environmentally sensitive areas around and in the Sweetwater River floodplain should be transferred to public or private non-profit ownership. Other open space areas should be the responsibility of community or neighborhood associations. Individual homeownership of open space should be avoided unless no environmental harm from potential encroachment on open space areas is possible.</p>	<p>The Project requires preparation of a Resource Management Plan (RMP) for on-site biological open space to be approved by the County. The RMP provides direction for the permanent preservation and management of the on-site open space in accordance with County regulations. No other open space areas are proposed on site that would be the responsibility of a community or neighborhood association.</p>	<p>Please see the response to Mining and Reclamation Phase. As stated, the on-site biological open space would be preserved and managed in perpetuity. Ownership would be transferred to a public or private non-profit entity to ensure that this occurs.</p>	<p>Mining and Reclamation: Yes</p> <p>Post Reclamation: Yes</p>