

3.2 Effects Found Not to Be Significant During Initial Study

CEQA Guidelines Section 15128 requires that an EIR contain a brief statement disclosing the reasons why various possible significant effects of a Project were found not to be significant and therefore were not discussed in detail in the EIR. The impacts associated with the following environmental issue areas were found to not be significant as a result of implementation of the Proposed Project: Agriculture and Forestry Resources, Geology and Soils, Mineral Resources, Population and Housing, Public Services, Recreation, Utilities and Service Systems, and Wildfire.

3.2.1 Agriculture and Forestry Resources

Based upon a review of historic aerial photographs, the Project site has been developed as a golf course since 1962. The Project site is not an active agricultural operation; nor does it have a history of agricultural production for over 55 years. Based on farmland mapping prepared by the California Department of Conservation (CDC) California Important Farmland Finder (CDC 2016), the Project area is not identified as containing Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The Project site is not subject to a Williamson Act Contract and is zoned as “Open Space,” “Specific Planning Area,” and “Holding Area” with a General Plan designation of “Open Space (Recreational).”

The surrounding areas within a mile of the Project site are mapped primarily as “Urban Land.” There are areas to the west and east of the Project site which are mapped as “Grazing Land” or as “Farmland of Local Importance;” however, these areas appear to have been mapped in error because they fall within areas that are either within the SDNWR or are within a portion of the Cottonwood golf course that is not proposed to be included as part of the mining operation. In addition, the Agricultural Preserve 21, located northeast of the Project site, had its Williamson Act Contract removed in 2010. Based on the above considerations, the Project is not anticipated to have indirect impacts relative to the conversion of farmland to non-agricultural uses because no such uses exist within the Project site or vicinity.

No forestland occurs within the Project area or immediate vicinity that would conflict with implementation of the Proposed Project. Therefore, implementation of the Proposed Project would not result in the loss or conversion of farmland or forestland. **No impact to agricultural or forestry resources would occur.**

3.2.2 Geology and Soils

The Project site is not located within 50 feet of the trace of an Alquist-Priolo fault or County Special Study Zone fault. Additionally, the site is not located within an earthquake fault zone identified by the CGS or an established Alquist-Priolo Earthquake Fault Zone (CDC 2015). The closest fault zone to the Project site is the La Nacion fault zone, located approximately 8.5 miles southwest of the Project site. At this distance, impacts related to fault rupture are minimal. However, although the Project site is not located within a known earthquake fault zone, the Project site is located within Seismic Zone 4, which is defined as the highest seismic zone; therefore, the site, as with the entire County and most of Southern California, is subject to ground shaking (County 2011b). Additionally, loose subsurface soils and near-surface groundwater is present beneath the Project site, allowing for the potential for liquefaction. As a result, mine workers and

equipment may be subject to the effects of seismic ground shaking and liquefaction during the Project's 10-year mining operation period. However, the number of people exposed to this potential hazard on the site would be reduced relative to current golf course operations. Additionally, given the nature of the Proposed Project as a sand mining operation, the associated risk of liquefaction is low; the Project does not involve the construction of permanent structures or structures that would provide housing, and the Proposed Project would adhere to the regulations in the Uniform Building Code (UBC) as well as applicable MSHA and OSHA regulations. As such, impacts related to fault rupture, ground shaking, and liquefaction would be less than significant.

According to the County of San Diego General Plan, the Project site is located within an area identified as having a moderate landslide susceptibility (County 2011b). However, no evidence of landsliding was encountered at the site during the geotechnical investigation or in the review of historic, stereoscopic aerial photographs. The risk associated with ground movement hazard due to landsliding was therefore determined to be low (Geocon 2020). Additionally, while the Project site is generally underlain with sand-based soils, the sand would be removed as part of the Project's mining activities. Additionally, the Project would adhere to the regulations in the UBC as well as MSHA and OSHA requirements. Therefore, impacts related to landslides and expansive soils would be **less than significant**.

3.2.3 Mineral Resources

The Project proposes a mining facility for the extraction of sand for construction uses. The California Geological Survey (CGS) classifies California mineral resources with the Mineral Resource Zones (MRZs) system. These zones have been established based on the presence or absence of significant sand and gravel deposits and crushed rock source areas used as construction aggregate. Areas classified as MRZ-1 through MRZ-4 have been mapped throughout San Diego County (CDC 2015). These categories are described as follows:

- **MRZ-1:** Areas where available geologic information indicates that little likelihood exists for the presence of significant mineral resources.
- **MRZ-2:** Areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists. This zone shall be applied to known mineral deposits or areas where well-developed lines of reasoning, based upon economic-geologic principles and adequate data, demonstrate that the likelihood for occurrence of significant mineral deposits is high.
- **MRZ-3:** Areas containing mineral occurrences of undetermined mineral resource significance.
- **MRZ-4:** Areas where available information is inadequate for assignment to any other MRZ category.

The property was previously classified by CGS in the 1996 *Update of Mineral Land Classification: Aggregate Materials in the Western San Diego County Production-Consumption Region* as a combination of MRZ-3 and MRZ-4 with a small section of MRZ-2 land located on the northeast

end of the Project site (CDC 1996). In 2017, CGS released Special Report 240 *Update of Mineral Land Classification: Portland Cement Concrete-Grade Aggregate in The Western San Diego County Production-Consumption Region, California* which reclassified the property from MRZ-3 and MRZ-4 to MRZ-2 (CGS 2017). This reclassification action was based on an aggregate resource evaluation report (TerraMins 2006) provided to CGS in 2016 by the property owner. A classification of MRZ-2 indicates that the area is underlain by mineral deposits where geologic data show that significant measured or indicated resources are present.

A Mineral Resource Technical Report was prepared by EnviroMINE (2020c) to evaluate the potential impacts of the Proposed Project on the availability of regionally significant mineral resources. The results of the analysis are summarized below, with additional description provided in Appendix T to this EIR.

Loss of Available Resources and Marketability

The Project proposes the extraction of aggregate (primarily sand), which is a known mineral resource that is of value to the region. The Proposed Project would include the removal and processing of all economically available materials within the Project site. Economic limitations are based on the potential collateral impacts that would result from an aggressive sand extraction program that would recover all potentially available resources, while also limiting the likely impacts to sensitive environmental resources. The Project is designed to avoid extraction directly within the river channel in an effort to avoid impacts to the hydraulic functions of the Sweetwater River channel and state and federally regulated waters, plus avoid potential impacts to water conveyance by Sweetwater Authority. Although extraction below the water table is anticipated in two areas of the site, areas of open water would be backfilled to avoid long-term open water evaporation.

High-quality aggregate resources that are present in the Project site are known to be in short supply in San Diego County and, as a result, have the potential to be extremely marketable (San Diego County 2008). As noted above, a 2017 study published by the CGS (Special Report 240) upgraded the classification from MRZ-3 to MRZ-2 for 167 acres (Sector HH) of the Project site. However, no estimate of the quantity of resources found on the site is provided in the CGS report. The volume of material to be extracted by the Project (5.7 million tons) was determined by a drilling program designed to identify the presence of economically available materials within the Project site.

Assuming a price of \$15.00 per ton, a density of 0.055 ton per cubic foot, and a waste factor of approximately 20 percent, the gross value of the total 5.7-million tons of aggregate material mapped as MRZ-2 is estimated to be approximately \$68,400,000.

The extracted aggregate sand would be used locally, providing value to the region. Extractive operations would recover unrestricted, economically recoverable resources within the Project footprint. As a result, reclamation would have no effect on future mineral resource recovery if it becomes economical. As such, implementation of the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state because the mineral resources in the site would be utilized in a manner that would benefit the region. Impacts would be **less than significant**.

Loss of Locally Important Mineral Resource

As discussed above, the mineral resources present on the Project site are known to be in short supply in San Diego County. Approximately 243 acres of the Project site are zoned as S90, Holding Area Use Regulations, approximately 32 acres are zoned as S88, Specific Planning Area, and approximately 4 acres are zoned S80, Open Space. The Proposed Project would extract all economically available mineral resource within the Project site during the proposed 10-year mining period. The proposed end uses following mining include recreational trails and open space.

Future mining activities would not be anticipated because all economically available resources would have been extracted by the Proposed Project. Additionally, the Project site is not a delineated mineral resource recovery site in the County's General Plan, an applicable specific plan, or other land use plan, so the Project would not result in the loss of availability of a recognized locally important mineral resource recovery site. Impacts to mineral resources would be **less than significant**.

3.2.4 Population and Housing

No occupied residential housing currently exists within the property and the Proposed Project would not introduce new housing. One residential structure on site would be demolished by the Project; however, this structure is severely dilapidated and is not occupied. The Project does not propose the development of housing, businesses, or other components that would directly induce population growth. In addition, the nine mining employees that would be required for the Project are anticipated to be from the existing population of the surrounding region. As such, the Proposed Project would not generate population growth nor would it displace people or existing housing. Therefore, **no impact** to population and housing would occur.

3.2.5 Public Services

Fire and Emergency Services

The Project site is served by the San Miguel Consolidated Fire Protection District. The closest fire station to the Project site is Station 22, located approximately 0.3 mile to the north near the intersection of Brabham Street and Via Rancho San Diego. The average response time for Station 22 was 6 minutes 32 seconds in the 2015/2016 fiscal year and 6 minutes 30 seconds in the 2016/2017 fiscal year. In addition, the San Diego headquarters of CAL FIRE is located 1.4 miles from the main Project entrance. Access to the site for both fire stations is provided by Jamacha Boulevard and Willow Glen Drive.

According to the Fire Protection Plan (FPP) prepared for the Project, the Project site is within an area designated as a Moderate Fire Hazard Severity Zone and is bordered to the south by an area designated as a Very High Fire Hazard Severity Zone (FireWise 2021). Based on the past and current use of the Project site as golf courses, the site does not contain a substantial amount of vegetation that could serve as fire fuel. In addition, as the Project's mining operations progress over the 10-year mining period, flammable vegetation would be removed and the potential for on-site fire would diminish. The Project would also adhere to the recommendations outlined in the FPP, which include skirting temporary portable buildings to prevent the accumulation of windblown leaf litter and other combustible debris; maintaining a 100-foot fuel management zone

around structures; ensuring that plants within the fuel modification zone are fire resistant; appropriately maintaining existing trees until they are removed as part of the site reclamation activities; ceasing extraction and conveyor operations when wind speed instantaneously exceeds 25 mph or when the wind speed average for 15 minutes is greater than 15 mph; and maintaining and equipping construction equipment with spark arrestors. Through complying with the applicable recommendations, the Project would minimize hazards related to fires and would not generate increased demand for fire protection or place a significant strain on the existing fire protection facilities. Further, through complying with applicable regulations related to workplace safety, such as those governed by the MSHA and OSHA, the anticipated number of events requiring emergency response is anticipated to be very low. The construction of new fire facilities and expansion of existing facilities would not be required to serve the Project. Therefore, the Project would not affect fire protection response times or substantially increase demand and impacts would be **less than significant**.

Police Services

The Project site is served by the San Diego County Sheriff's Department. The closest sheriff station to the Project site, the Rancho San Diego Station, is located at 11486 Campo Road near the junction of Jamacha Road and Campo Road, approximately 2.4 miles from the site approximately one mile to the west along Campo Road. The Project does not propose uses that typically generate a demand for police protection services, such as a housing development. Limited police protection may be required during Project operation if theft or vandalism of mining equipment or the Project site were to occur; however, these types of events would not affect police protection response times or substantially increase demand. The construction of new police facilities and expansion of existing facilities would not be required to serve the Project. Impacts would be **less than significant**.

Other Public Services

The Project would not result in the introduction of a temporary or permanent population and would therefore not place increased demand on schools, parks, or other public facilities. Impacts to public facilities would be **less than significant**.

3.2.6 Recreation

The Proposed Project would not result in the introduction of a temporary or permanent population and would therefore not place an increased demand on existing parks. Implementation of the Project would result in phased removal of an existing privately-owned golf course. Although golf course closure would result in the loss of a private recreational resource, given the specific nature of the resource, its loss is not anticipated to result in an increased demand on neighborhood or regional parks or other public recreational facilities. Existing golf course users would likely be distributed across other golf courses in the area, including, but not limited to, the Steele Canyon Golf Club and Sycuan Golf & Tennis Resort, which are located approximately 1 mile and 2.5 miles from the Cottonwood Golf Course, respectively. The potential increased demand on outside golf course facilities would result in the generation of additional revenues, which would offset potential maintenance needs. Demolition of the Cottonwood Golf Course would not cause a strain on outside recreational facilities in a manner that would cause or accelerate the physical deterioration of the facility.

Reclamation efforts following the commencement of mining operations include the construction of community trails in the southeastern portion of the reclamation plan boundary. Construction of the trails would be performed in conjunction with habitat enhancement activities involving improvements to the channel and expansion of riparian vegetation in an area currently dominated by invasive plant species. The trails would require minor construction work and upkeep and would be limited to only a portion of the site. The trails would be included in the design of the reclamation plan, which collectively aims to restore the environmental quality of the site. Therefore, implementation of the Project would not accelerate the physical deterioration of existing recreational facilities or cause adverse effects on the environment through the construction of new recreational facilities. Impacts would be **less than significant**.

3.2.7 Utilities and Service Systems

Water required for the Project's mining operations, including water for material processing operations, dust control, and irrigation, would be provided by on-site groundwater wells. Water usage would depend on production volume, which would vary year-to-year with market demand; however, the Project's estimated water usage assumes the maximum annual production of 570,000 tons of sand/aggregate. Water usage is estimated at 54 acre-feet annually from water shipped off site and evaporation from stockpiles at this production rate. A single water truck would be required for dust control. Evaporation from temporary pit ponds is estimated at 20 acre-feet per year. Water required to suppress dust from the mining operations is estimated to require 25 acre-feet of water per year. Irrigation of the landscaped earthen berm near the entrance and as supplemental water on revegetated areas is estimated to utilize approximately 55 acre-feet per year. Total water consumption, including evaporation, for the Project is estimated at 154 acre-feet per year. Water for processing, dust control, and irrigation would be supplied by on-site groundwater wells. Eight groundwater wells on the property currently provide irrigation water for the golf courses on the property. These wells would be used to provide water for the mining operation. Existing use of groundwater by the golf courses has been estimated at approximately 787 acre-feet per year based on pump ratings and irrigation schedules. Mining operations would reduce this groundwater use by approximately 632 acre-feet per year (EnviroMINE 2020a). In addition, the Project's water requirement would be limited to the 10-year mining operation period. Upon completion of mining activities, the Project would discontinue extracting water from the on-site wells. Therefore, sufficient water supplies are available to serve the Project.

Additionally, the Project would include on-site de-siltation basins that would accommodate runoff and prevent sediment from leaving the site while allowing water to pass through to existing drainage features. Wastewater generated by the Project would be limited to temporary portable restrooms. Upon closure of the golf courses and decommissioning of the club house and associated wastewater-generating facilities, the amount of wastewater generated at the Project site would decrease. Upon completion of mining and reclamation activities, the portable restrooms would be removed, and the open space would not generate wastewater. Therefore, the Project would not produce wastewater in a manner that would exceed wastewater treatment requirements of the applicable RWQCB. Additionally, the Project would not require the construction of new water or wastewater treatment facilities or stormwater drainage facilities and would not place an excessive demand on water and wastewater treatment providers.

Implementation of the Project would generate minimal solid waste. Solid waste generated by the Project would include demolition debris as well as limited domestic refuse generated during the 10-year mining operation period and additional two years for final reclamation and revegetation. The amount of domestic refuse generated by nine employees would be minimal. Vegetative waste would be properly diverted to a green waste facility in accordance with the County Solid Waste Ordinance. Material extracted from the site not designated as saleable product would be utilized as backfill. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440 et seq.). The Project would deposit all solid waste at a permitted solid waste facility and would comply with federal, state, and local statutes and regulations related to solid waste. Additionally, the Project would not generate substantial amount of solid waste and there is sufficient existing permitted solid waste capacity to accommodate the Project's solid waste disposal needs. Impacts to utilities and service systems would be **less than significant**.

3.2.8 Wildfire

The Project site is located in a region of San Diego County that experiences warm wet winters and long, hot, and very dry summers with occasional droughts. The Project site is within an area designated as a Moderate Fire Hazard Severity Zone due to its past use and maintenance as golf courses. Although there are interspersed pockets of native coastal sage scrub and riparian vegetation, they are not continuous over the entirety of the site and do not represent a substantial fuel load. However, areas south of the Project site are designated as within a Very High Fire Hazard Severity Zone by the state. As such, there is a risk for wildfires to occur at and/or near the Project site.

A FPP was prepared by FireWise (2021) to evaluate potential impacts associated with wildland fire hazards and to identify protective measures. The FPP prepared for the Project was based on a field assessment of the Project site (including on-site and off-site adjacent areas) and an assessment of fire risk using fire behavior modeling. A summary of this information is provided below, with additional description provided in Appendix U to this EIR).

As discussed above, based on the past use of the Project site as golf courses, the site does not contain a substantial amount of vegetation that could serve as fire fuel. It is anticipated that if a fire were to occur at the site, from a fire started either on or off site, it would be a smoldering, creeping ground or surface fire with minimal flame lengths (FireWise 2021). Further, fire would only occur in areas that have not yet been cleared for mining purposes as part of the Project. As the Project's mining operations progress over the 10-year mining period, flammable vegetation would be removed and the potential for on-site fire would diminish.

The FPP developed for the Proposed Project outlines recommendations for minimizing hazards related to wildfires (FireWise 2021). The FPP recommendations include guidance on water supply, fire access roads, property line setback distances, construction equipment maintenance, fire protection systems, 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. By following the recommendations in the FPP, the Project would also demonstrate compliance with all applicable fire codes, including the California Fire Code, the International Fire Code (IFC), the San Diego County Consolidated Fire Code, and the San Miguel Consolidated Fire Protection District (SMCFPD) Code.

Willow Glen Drive would serve as the primary access route used by the Project. As determined in the FPP, implementation of the Project would improve fire access to the site as a result of the proposed improvements to Willow Glen Drive, which would include restriping the roadway to provide a right-turn lane for entrance into the Project site near the processing plant. The Project would adhere to the FPP recommendation to construct all driveways into the Project to be 24 feet wide all-weather surface driveways suitable for travel by 75,000-pound fire apparatus. The minimum vertical clearance of 13.5 feet would be maintained for the entire required width of the required fire access roads, and all driveways and parking areas would be paved asphalt or concrete. Additionally, all fire access roads serving the Project area are county roads with greater than 40 feet of all-weather surface suitable for travel by 75,000-pound fire apparatus. By adhering to these recommendations, fire emergency access would be maintained. Furthermore, as stated above in Section 3.2.5, implementation of the Project is not anticipated to substantially increase the population in the area or put an increased strain on fire protection services. Therefore, the Project would not conflict with applicable emergency response objective. Impacts related to wildfire would be **less than significant**.