

Policies and Recommendations page 8

5. Provide for street tree planting and landscaping, as well as the preservation of indigenous plant life.

7. Buffer residential areas from incompatible activities that create heavy traffic, noise, lighting, odors, dust, and unsightly views. (Pp)

9. Require strict and literal interpretation of the requirements for a Major Use Permit when analyzing such permit applications. (Pp)

10. Allow certain **non-disruptive** commercial uses in residential areas after analysis on a site-specific basis. (Pp)

I do not believe this project is non-disruptive! Please address.

Policies and Recommendations page 11

4. Encourage commercial activities that would not interfere either functionally or visually with adjacent land uses or the rural atmosphere of the community. (P)

15. Require commercial and industrial land uses to minimize adverse impacts, such as noise, light, traffic congestion, odors, dust, etc.

AGRICULTURAL GOAL page 12

PROVIDE FOR THE PRESERVATION OF AGRICULTURAL LAND USES, WHILE MAINTAINING THEIR COMPATIBILITY WITH OTHER NON-RURAL USES.

FINDINGS

Lakeside has a unique agricultural heritage, which the community wishes to perpetuate. In the urban core, large scale agricultural uses have given way to residential development. In spite of this, extensive portions of the Plan Area display significant primary and secondary agricultural uses. These areas include Eucalyptus Hills, Moreno Valley, the **El Monte Road area**, and Blossom Valley. Secondary agricultural uses are also common in areas within the Village Boundary Line Maintaining and enhancing these agricultural uses is essential to the basic character of the Lakeside community.

Please address the permanent loss of agricultural land

POLICIES AND RECOMMENDATIONS page 17

4. Promote agriculture as one of the highest and best uses for open space and floodplains. (GEN)

5. **Encourage the use of agriculture to provide visually pleasing open space and variety within the rural environment. (GEN)**
6. **Enhance economic advantages to agriculture to help it compete with other alternative land uses. (GEN)**
7. Analyze existing animal regulators for rural properties and apply less restrictive animal regulators to areas where the application of such regulators can be found compatible with neighboring uses. (P)
8. Permit animal raising projects sponsored by recognized youth organizations in designated areas of Lakeside. (I)

This project will permanently remove rich alluvial soils used for agricultural lands!

Please address.

Also, due to the removal of this rich alluvial soil, how do you think the “reclamation” plants will survive?

Please address.

INDUSTRIAL GOAL

PROVIDE FOR THE KIND OF INDUSTRIAL DEVELOPMENT THAT DOES NOT DETRACT FROM THE EXISTING RURAL CHARACTER OF THE COMMUNITY.

10. Ensure that a concentration of limited impact industrial and commercial uses is provided for during the formulation and implementation of the San Diego River Plan. (P)
12. **Industrial development that detracts from the rural character of Lakeside SHALL NOT BE APPROVED.**

Please address #12 above

6. CONSERVATION

ENVIRONMENTAL GOAL

PROVIDE A DESIRABLE, HEALTHY, AND COMFORTABLE ENVIRONMENT FOR LIVING, WHILE PRESERVING LAKESIDE'S RURAL ATMOSPHERE AND UNIQUE RESOURCES.

POLICIES AND RECOMMENDATIONS

1. Encourage types and patterns of development that **minimize water pollution, air pollution**, fire hazard, **soil erosion**, silting, **slide damage, flooding**, and severe hillside cutting and scarring. (P)
2. **Preserve the best natural features of the area in their natural state** and avoid the creation of a totally urbanized landscape. (Pp)
3. **Protect groundwater supplies from pollution and depletion** through enforcement of the County Groundwater Ordinance

4. **Ensure that land uses within or adjacent to recreational, natural preserve, agricultural, or industrial areas are compatible with those areas.** (P,R)
5. Identify and apply the **Scenic Area (S) Special Area Designator** to sites where significant natural landmarks are located. (P)
8. Require the isolation of roadside properties from major roads and prime arterials with buffer zones of vegetation or earth barriers to protect adjacent areas from pollutants such as noise, exhaust, and light. (Pp)

FLOODPLAIN GOAL

ENHANCE THE FLOODPLAINS AS AN ENVIRONMENTAL, RECREATIONAL AND ECONOMIC ASSET TO LAKESIDE.

FINDINGS

The **appropriate utilization of floodplains is of primary interest to the citizens of Lakeside.** The section of the **Upper San Diego River** from Santee to El Monte Park is utilized for a variety of activities including: **crop raising, dairy farming, commerce, and industry.** The prevailing use involves the extraction of sand for construction. Studies have proven that the sand resources of this portion of the San Diego River are substantial, however, **problems can arise if extraction** is not conducted in an orderly and controlled manner. Issues involving extractive uses include:

- **Protection of the groundwater supply;**
- **Disturbance of the natural flood drainage system;**
- **Aesthetic nuisance caused by the presence of a noxious industry in the community; and**
- **Rehabilitation of depleted mines.**

1. Improve natural drainage channels when it is necessary to protect life and property. (DPW)
2. Encourage the utilization of the **floodplains outside for recreation, open space, agriculture.** (Pp)
5. **Design the use of floodways where public access is available so that all modes of recreational transportation will have an opportunity to enjoy this space.** (DPW)

Sand Mining and Extraction

POLICIES AND RECOMMENDATIONS

POLICIES AND RECOMMENDATIONS

1. **Permit only** controlled extraction operations that have a minimal adverse impact on the environment. (Pp)
2. Extract sand and gravel in a way that minimizes any harm or disturbance to adjacent residents and properties. (Pp)
3. Minimize dust, noise, traffic, unsightly views, accumulations of water, steep slopes, and safety and health hazards resulting from sand and gravel extraction. (Pp)
4. Recognize that extraction of sand and gravel is a long-term process. Allow extraction only on a controlled, coordinated basis, and provide for the rehabilitation of worked out areas. (Pp)
5. Consider a system of recreational lakes outside of the floodway that could be created by extractive operations. (GEN)
6. Protect areas designated in the plan for sand, gravel, and rock excavation from scattered and incompatible urban intrusion by applying Extractive Use Regulations to such areas. (P)

7. Plan the eventual rezone and reuse of the land containing this resource for agriculture, husbandry, recreation, open space, and as "made land" above the floodplain suitable for industry, commerce, or housing through reclamation plans. (P)

Recreation Goals

A system of riding and hiking trails is included as part of the Community Trails Master Plan. The earlier history of Lakeside as a rural community has left a legacy of horseback riding and hiking. The intent is to provide a system that is physically and functionally integrated with other major transport facilities, and integrated with the Bicycle, Pedestrian, and Trail Facilities section of the County General Plan Mobility Element. The San Diego, San Vicente, and Los Coches **floodplains have been designated as prime locations for trail alignments because of the open space nature of the floodplain uses.**

9. Strive to provide acreage for local **recreational areas at the level of 15 acres per 1,000** in population; a goal of the San Diego County General Plan Conservation and Open Space Element. At least one third of the park system's area should be devoted to neighborhood and other close-at-hand recreational facilities, and the remainder used for facilities serving all of Lakeside, such as community parks, community recreation centers, trails, nature preserves, lakes, and camping areas. (DPR)

12. **Minimize costs of a trails system by utilizing floodplains, drainage channels, public lands, and major utility right-of-ways, wherever legally possible.** (DPW)

13. **Ensure proper location, adequate size, and lower costs by acquiring park sites in advance of need.** (DPR)

14. **Utilize any funding sources available to finance recreational facilities and services for all socio-economic groups, but avoid any dependence on property taxes.** (DPR)

15. **Promote a system of trails for horseback riding, bicycling, and hiking, for both transportation and recreation.** (DPW)

16. **Where appropriate, require trail easement dedication.**

58. El Cajon Mountain - El Capitan Reservoir - This large area contains very steep slopes (the portion in Lakeside about 60 to 70 percent is greater than 50% slope) and isolated rocky peaks and ridges, including some of the largest granitic domes in San Diego County. Vegetation is excellent wildlife habitat with Oak woodlands, Coastal Sage scrub and Mixed and Chamise chaparral. The area contains such rare and endangered plants as the type locality for the threatened Lakeside wild lilac (*Ceanothus syaneus*), the threatened Morena current (*Ribes canthariforme*), the Felt leaf rock mint (*Monardella hypoleuca* ssp. *lanata*) and Adders tongue fern (*Ophioglossum californicum*), the very rare and endemic Dense reed grass (*Calamagrostis densa*) and the rare Ramona cinquefoil (*Horkelia truncata*). The area contains historical and existing golden eagle nest sites.

The rocky peaks, especially El Cajon Mountain, serve as a scenic backdrop for El Cajon as well as the Lakeside region.

***As you can see, this project is NOT consistent with Lakeside's Community Plan!
Please address this inconsistency AND the reasons.***

#10 **Air Quality** This project says that there will be LESS pollutants in the air because the sand trucks will travel less on the San Diego roads. What about OUR air quality here in Lakeside? Do we not count? People in close proximity of this project will be exposed to sand, dust, molds, and Valley Fever. What about our children who are in Lakeside and outside with sport activities? The track team, the football team, the softball teams, hockey teams, horseback riders, and elderly who walk in the El Monte Valley? What about the handicapped adults and children that take riding lessons at several different ranches on Willow Rd? Many of these people have a multitude of health problems. How will the dust and mold spores affect them?

Please address as these issues can be life threatening.

#11 **Trails**

Today, the equestrians of Lakeside enjoy 25 miles of trails and have enjoyed these trails for over 50 years. The mining company keeps saying we are using "unauthorized trails" in the river bottom. How can that be when Helix has installed horse gates all along Willow and Ashwood Rd. In fact, a brand new gate was just installed a few months ago on Willow Rd. If we were indeed using "unauthorized trails" why did you, the County put in a Horse Crossing on Ashwood Rd?

I am concerned that if the future trails plan is not **endowed in easements in perpetuity** to the County, they will be empty promises. Especially when the proponent's plans say that after the project is complete, in the year 2034-5, that the trails will be moved!

I am 57 years old now, IF this project ends in 2014-5 (which I have serious doubts) I will be 76 years old. Will I ever be able to see this project finished? Probably NOT! I moved to Lakeside to be able to ride the trails in Lakeside's river bottom. NOT to ride by a construction site with not an animal or tree in site! Lastly, where are the trails that were given to us by the last mining company in El Monte Valley? They were promised.

Please address

#12 **Promises, Promises, Promises!**

In the 1980's **Enniss** promised the community after 25 years of mining, they would give the community a staging area, a lake, equestrian camping at the base of San Vicente Dam as part of their reclamation plan.

The records show they have mined to deep, and to close to the road. The money they set aside for reclamation (according to the Federal Government) is gone.

They are now doing rock crushing...do you have any idea how much impact that is now causing the neighbors?

If not, just drive out to Vigilante Road any day of the week and you will see. If not, I would be glad to send you pictures!

McGrath in 2003 promised after 4 years of mining at the intersection of Willow and Moreno Rd. Mr. McGrath told me personally he would give us a trail to link Moreno Ave and the River bottom, it is the Vine Street Trail on the Lakeside Trails and Pathway Map. Did he? NO.

They have sold the property to Superior (and a bunch of other names on the deed). The County has contacted them about their promise of that trail. Supervisor Jacob is interested in this because of her vision on the East County Equestrian Center and the important link to the trail system. Superior is unwilling to give us anything "at this time" because they plan on mining. Although, who knows where since that piece of property is "mined out".

Hanson #1 The property on Channel Rd. No reclamation, the Lakeside River Conservancy is now using GRANT money to restore...that means WE are paying for it, not Hanson!

Hanson #2 The property on El Monte Rd. No restoration from Hanson, Endangered Habitat's and the Lakeside River Conservancy are now using GRANT money to restore the property, yes...WE are once again paying for that also.

This is also not the first time Hanson and Endangered Habitats have gone in together to "restore" what was left by mining.

See: 2012 Russian River Floodplain restoration City of Windsor, Sonoma County

Woodward Sand They are the last company to mine in the El Monte Valley. Restoration....Trails.. that we were promised. NOPE, if we had gotten those trails in easements as promised I would not be writing this letter to you now!

As you can see from past actions, no sand mining company has fulfilled their promise of "reclamation" How do you, the County assure that this mining company will follow the rules when no other company has done so? What makes this company any different than all the others in Lakeside?

How will this project be regulated?

How will these promises be fulfilled if this project doesn't end until at least the year 2034-5?

Please address

#13 Quality of Life

As mentioned in the Lakeside Community Plan, the residents of Lakeside enjoy our quiet rural lifestyle. We enjoy waking up and seeing red tail hawks, golden eagles, owls, wild peacocks, and turkey in our yards. We love the sounds of coyotes howling at night. We love the lack of lights from street lights and the peace and quiet. They are just a few of the many reasons that we live in Lakeside. With the approval

of this project that will all be gone for many residents. The miners say they will only mine for 15 years with reclamation plan of 4 years. How does the County plan on mitigating "our way of life" How is that possible? How would YOU like to wake up to dust in your eyes, the noise of digging and constant trucks traffic?

Please address

Sincerely,

Karen Ensall

A handwritten signature in blue ink that reads "Karen Ensall". The signature is fluid and cursive, with the first name "Karen" and last name "Ensall" clearly legible.

11624 Moreno Ave
Lakeside, Ca. 92040

Hingtgen, Robert J

Subject: RE: El Monte Sand Mining & Nature Preserve

From: kathleen digenan [<mailto:kdigenan@gmail.com>]

Sent: Monday, September 14, 2015 12:01 PM

To: Bennett, Jim

Subject: El Monte Sand Mining & Nature Preserve

I am writing to express my concerns with the Sand Mining project in the El Monte Valley in Lakeside.

A major concern is the truck traffic that will be generated. The road out of El Monte Valley is a two lane road with one exit that is a four way stop. Your first option at the four way stop is left up Lake Jennings Road. This is a steep grade that trucks with full loads would take slowly and have to shift several times to get to the top. At the top the two lanes narrow to one. Once they reach the top, they have to slow for the first of two traffic lights. The two traffic lights are only a few hundred feet apart and are major entrance and egress points for thousands of residences including a fire station and I-8 at Lake Jennings. The I-8 at this point is two lanes. The on ramp is traffic light controlled at peak hours, so trucks would have to stop at this point also and slowly merge onto the two lane freeway. This traffic is already congested with traffic from the entire East county and beyond.

Your second option at the four way stop at the end of El Monte Road is right onto Maplevue, which has three traffic lights. Between the lights there are many spots where cars cross traffic to get to residences including several apartment complexes. The light at Ashwood is the major intersection for El Capitan High School. Morning, mid-day and afternoon traffic at this intersection is already highly congested. Many drivers in this area are young and beginning drivers. Unfortunately, this is already a challenging area for these drivers. The heavy truck traffic would only add to the dangerous conditions. Foot, bike, and skateboard traffic in this area is also very dense.

One block from this intersection is the major intersection at Highway 67. This is a high traffic corridor with traffic feeding from I-8, 52 and I-15 freeways. All traffic to and from these freeways come to a stop-lighted intersection. Waits at these traffic lights can be as high as 5 minutes. All east county traffic would be heavily impacted by the truck traffic from this project.

Proponents of this project say it would reduce ozone levels due to trucks not driving as far for sand. Realistically, this is a farce due to the congestion of traffic that the trucks would cause.

Add to all of this, is the fact that these roads are not constructed to handle the heavy trucks and will crumble beneath them.

As you can see this is a terrible problem for thousands and thousands of citizens that can not be overlooked or mitigated.

Thank you for your consideration and time on this matter.

Kathleen Digenan
15836 El Monte Road
P.O. Box 122
Lakeside, Ca 92040
kdigenan@gmail.com

Hingtgen, Robert J

To: Bennett, Jim
Subject: RE: El Monte Strip Mining project

From: tkkearney@aol.com [<mailto:tkkearney@aol.com>]
Sent: Monday, September 14, 2015 12:02 AM
To: Bennett, Jim
Subject: El Monte Strip Mining project

Dear Mr. Bennett,

I am also writing to let you know how important I think the recreational, historic, habitat, and water resources are in El Monte Valley. The proposed sand mining plan (El Monte Nature Preserve) would threaten the third largest aquifer in San Diego County as a trade off for sand. I think it is far more important to protect the water, habitat, recreational and the agricultural values of El Monte Valley.

The State of California, the County of San Diego, and various communities not to mention local citizen donors have contributed millions of dollars to create the San Diego River Park. This 52-mile, park from the mountains to the sea, is being developed for everyone to enjoy. The El Monte Valley has always been envisioned as the core this project, in part due to its proximity to the urban centers of San Diego. Known for its amazing beauty, the flume trail, its equestrian uses, and diverse wildlife, this sand mine would permanently compromise the beauty of the El Monte Valley and the San Diego River Park effort.

I am also concerned about the threat of Valley Fever (*Coccidioides immitis* or *Coccidioides posadasii*) posed by the proposed sand mine in El Monte Valley. The valley is a hotspot for this illness in East County. Because schools, ball fields, homes and urban centers are located within the prevailing wind patterns of the valley, many people would be expose to this potentially fatal disease including many children.

I strongly believe that the El Monte Sand Mining project will have a tremendous negative impact on so many aspects of the existing El Monte Valley: It will affect the surrounding neighborhoods and their singular underground water source, risking their well water quality. Noise pollution is also a consequence which will chase away any existing wildlife, and the consideration is not even short-term; it is over the period of 15 years. There needs to be a balance between development and open space. This project is destroying that balance.

I see no benefit to the community in this. Upon closer examination, this company seems to be a sham, with a history of mining illegally under a presumed golf course permit. Changing the name does not change the motivation or the integrity ! It would seem that there is a reason that the valley is currently zoned as agricultural with a scenic corridor designator. Why should one company have the right to alter all of that just for its own purposes.

NO on EL MONTE NATURE PRESERVE SAND MINING!

Kathy Kearney
Lakeside resident
6195613118

EL MONTE SAND MINE & NATURE PRESERVE

PDS2015-MUP-98-014W2, PDS2015-RP-15-001

NOTICE OF PREPARATION (NOP) OF ENVIRONMENTAL IMPACT REPORT

PUBLIC REVIEW PERIOD

August 13, 2015 through September 14, 2015

PUBLIC SCOPING MEETING COMMENT SHEET

NOP Scoping Meeting August 26, 2015

Lakeside Community Center

9841 Vine Street

Lakeside, California 92040

RECEIVED
SEP 14 2015

WRITTEN COMMENT FORM

Planning and
Development Services

We are extremely disappointed to learn of possible sand mine operation which will destroy the natural habitat of the area, the water supply, the air quality as well as the roads with truck travel through the area. Why would you trick the residents by calling a mining operation which destroys the environment a "nature preserve?" Please do not destroy the beauty of the area as we know we will also be affected as Santee neighbors!

(Attach additional pages as needed)

Signature

Date

Kris & Barbara Shedd

Print Name

MAIL or E-MAIL COMMENTS TO:

Jim Bennett
County of San Diego
Planning & Development Services
5510 Overland Ave, Suite 310
San Diego, CA 92123
Phone#: (858) 694-3820
e-mail: jim.bennett@sdcounty.ca.gov

11315 Canyon Park Drive

Address

Santee CA 92071

City

State

Zip Code

COMMENTS MUST BE RECEIVED BY 4:00 PM, SEPTEMBER 14, 2015

September 14, 2015

Jim Bennett
Planning and Development Services
5510 Overland Ave, Suite 310
San Diego, CA 92123

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

I'm writing to offer my concerns regarding the scope and nature of the environmental impacts anticipated to be caused by the El Monte Valley San Mining Project. I ask that these concerns be thoroughly considered in the preparation of the Environmental Impact Statement and for staff when they consider their position on this project that will have serious repercussions for a community and ecosystem.

I have serious concerns regarding the pollution and reduction of the aquifer within the El Monte Valley. In an area with so little water, we need to better protect our water sources, not destroy them. This project seeks to mine the dirt 90 feet below the current elevation, which will expose the surface of the San Diego River, thereby making this subterranean water source susceptible to the rapid rates of evaporation we witness here in East County. The loss of the sand will also destroy the natural filter the sand provides to help clean our water in this valley. There are also many animals that depend on the aquifer to provide moisture in this arid region.

The soil consistency of this valley is part of what makes this valley unique. Once the soil becomes less porous, certain plant species may no longer be able to make their home in the Valley. This shall also have a disastrous effect on the animals in the Valley. Once certain plant species disappear, other animals that relied on these plants for food or shelter, will also disappear, thereby causing ripple effect in the ecosystem. There have been numerous reports that demonstrate how even small changes on an ecosystem can have devastating effects. This project is proposing major changes, for over a decade, that will permanently impact the sensitive flora and fauna that call this Valley home.

An aquifer, by its very nature is underground and not easy to measure or monitor. If any company is granted the ability to mine the El Monte River Valley, they will indiscriminately make use of the water located in the valley, to wash their sand and spray down the dust kicked up by large trucks and earth movers. The sound and fumes created by the mining equipment and hauling trucks will also have negative effects on the sensitive animals that use these areas for nesting grounds and migration. These impacts will affect the whole Valley, not just on the areas proposed for sand mining. Additionally, the pollution and water level depletion to the nearby resident wells is another huge concern of water waste.

Other concerns include the watering of the Valley Fever spores, that have been identified in this Valley, that will be kicked up with the dust and distributed to the nearby residents, the employees of the sand

mining, the children who visit the pumpkin patch, the patrons of the nearby venues, the horseback riders, the trail users, El Capitan high school (situated at the end of the Valley), and the animals that are susceptible to these fungal spores.

A huge concern too is the ease at which the developer promises to only mine for a certain amount of time and then develop it into a nature preserve. Even if 15 years of mining in the Valley didn't have such a huge negative impact to the aquifer, flora, fauna and residents, the Community of Lakeside has NEVER had a developer stop sand mining once they've begun. It is just too lucrative and they can easily promise more and more to the municipalities and politicians with their proposed MUP renewals. This developer has already said there is over \$2 billion worth of sand and land in El Monte Valley, do you really think they will stop? Unbreakable restrictions need to be set in place, so that developers cannot continually renew these types of permits.

There are many other numerous concerns, but I urge you to refer to SANDAG's "San Diego Region Aggregate Supply Study", which eliminated El Monte Valley sand from consideration due to its proximity to residential. I'm confident the Environmental Report will demonstrate the negative impacts to be too great to mitigate and that this project, and others like it, should not be considered in the El Monte Valley.

This is not the only option for restoring this Valley to a native setting for animals, plants and people to enjoy. There are numerous grants and non-profits that are ready to purchase this land, at fair-market value, to do just that! Don't make the assumption that there is only one way to pay for the restoration as the developers have stated.

Sincerely,

Kristen C. Mitten
Vice-Chair of the Lakeside Community Planning Group
Member of the Lakeside River Park Conservancy
Mother of two small children
Resident of East County for 20+ years

Hinataen, Robert J

Subject: RE: El Monte Valley Mining Project.

From: Kyle Kearney [mailto:elyk53@gmail.com]

Sent: Monday, September 14, 2015 2:50 PM

To: Bennett, Jim; Horn, Bill; Roberts, Dave; diane.jacob@sdcounty.ca.gov; Cox, Greg; Roberts, Ron; Fitzpatrick, Lisa

Subject: El Monte Valley Mining Project

I am writing to express my opposition to the El Monte Valley Strip Sand Mining Project (PDS2015-MUP-98-014W2, PDS2015-RP-15-001, LOG NO. PDS2015-ER-98-14-016B). This will destroy a diverse ecosystem in a manner which no amount of "restoration" can undo. Don't let the name of "El Monte Nature Preserve" mislead you as to their true purpose.

Please support me and the entire San Diego community by objecting to, and saying "NO" to the El Monte Valley Nature Preserve LLC strip sand mining project.

Thank you,
Kyle Kearney
9474 Deanly St.
Lakeside, CA 92040



Our mission is to preserve and restore the biological integrity and beauty of the San Diego River while integrating recreational, educational, and cultural opportunities for youth, seniors, families and citizens of East San Diego County.

September 13, 2015

Mark Wardlaw, Director
County of San Diego
Planning and Development Services
Project Processing Counter
5510 Overland Avenue, Suite 110
San Diego, California 92123

Re: SCOPING COMMENTS
El Monte Sand Mining and Nature Preserve
PDS2015-MUP-98-014W2, PDS2015-RP-15-001, LOG NO. PDS2015-ER-98-14-016B

Dear Mr. Wardlaw:

Thank you for the opportunity to provide scoping comments in response to your Notice of Preparation of an Environmental Impact Statement for the above-referenced project.

Lakeside's River Park Conservancy (the "Conservancy") is a California non-profit public benefit corporation and a 501(c)(3) charitable organization. Our mission is "to preserve and restore the biological integrity and beauty of the San Diego River while integrating recreational, educational and cultural opportunities for youth, seniors, families and citizens of East County." With the invaluable assistance of the public through state and local grants, volunteer contributions, individual donations, and overall community support, the Conservancy has pursued our mission by completing and undertaking new projects to restore large segments of the San Diego River. The Conservancy's projects revive wildlife habitat, improve flood control, and integrate recreational and educational opportunities.

It is ironic that our projects have alleviated many of the adverse impacts of previous sand and gravel mining operations on the river and that we are now confronted with a proposed long-term far-reaching sand and gravel mining project in the El Monte Valley river environment. Our scoping comments arise from our experience in understanding and reversing many of the inevitable effects of such projects.

We have serious concerns about the proposed project as described in the Notice of Preparation Documentation. The sheer magnitude and duration of the proposed project and the value of the materials extracted eclipse any possible funding or resource requirements for the benefit of a nature preserve at the project site and its vicinity. Therefore, our comments address the proposed project as a sand and gravel mining project with the development of a nature preserve as post-project reclamation.

Our scoping comments fall into five main categories:

1. The adequacy of the proposed EIR process
2. Hydrology and water quality concerns
3. The effect on existing species in the project area
4. Restoration plans and integrated recreational uses of the completed restoration
5. Other concerns, including funding and public health

1. EIR Process

- a. The boundaries of the Major Use Permit as presented in the published project description do not appear to be accurate. Please make any boundary correction in a new or recirculated Notice of Preparation.
- b. The total proposed Major Use Permit boundary is nearly 530 acres on land currently owned by Helix Water District.” (Page 1 NOP.) The applicant does not have legal rights or access to the full 530 acres. We believe applicant only has an option to purchase only 480 of such acres. The basis for the MUP coverage of 530 acres needs to be addressed.
- c. A new and independent (non-tiered) EIR is required for the proposed project. The EIR that was certified for the El Capitan Golf Course evaluated the effects of a dramatically different project with environmental effects which differ in kind and severity. The proposed mining project would be far more invasive and would extract approximately 12,000,000 cubic yards of aggregate material over 15 years. Extraction operations would encompass approximately 167 acres reaching a depth of 90 feet (approximately 60 feet below the average ground water level) with a total of 188.6 acres affected by mining operations. Excavated materials would be processed at an on-site aggregate processing facility.

The Notice of Preparation Documentation states that a Subsequent EIR (SEIR) will be prepared under the authority of CEQA Guidelines section 15162(a)(1). Public Resources Code section 21166 and CEQA Guidelines section 15162(a)(1) require preparation of an SEIR when an EIR has been certified for a project and the lead agency determines that there have been substantial changes in the proposed project requiring major revisions due to new significant impacts or an increase in the severity of previously identified significant effects. However, neither Public Resources Code section 21166 nor CEQA Guidelines section

15162 apply here because the proposed mining project is a new and substantially different project from the one considered in the golf course EIR. Therefore, a Subsequent EIR, as outlined in the Notice of Preparation Documentation, is not appropriate. Moreover, and importantly, the baseline environment has changed significantly since the draft golf course EIR was released for public review in September 1998 (incorporating earlier technical studies). Technical studies and data utilized in the golf course EIR are stale in the light of changed circumstances, and cannot be meaningfully used in the EIR for the proposed project to adequately describe either the baseline environment or potential environmental effects of a substantially different project.

2. A detailed analysis and mapping of the hydrology and water quality of El Monte Valley is required in the EIR for the proposed project.

- a. The Governor of the State of California has issued Executive Orders declaring that a state of emergency exists throughout the state due to severe drought conditions. In addition, the Governor has issued an Executive Order (B-29-15) requiring the SWRCB to issue and implement emergency water conservation regulations in light of diminishing water supplies, which it has done.

Santee-El Monte Basin is included within the San Diego Hydrologic Unit. One of the beneficial uses designated for the basin in the San Diego Basin Plan is "MUN". The "MUN" beneficial use includes uses of water for community, military, or individual water supply systems including, but not limited to, drinking water supply. The proposed project would excavate and process minerals from approximately 167 acres within the basin to a depth of 90 feet over the course of 15 years. The EIR needs to evaluate how the proposed project would affect this crucial source of drinking water and ensure that it will not be diminished, particularly in the midst of the ongoing state of emergency.

Indeed, "The Santee-El Monte Groundwater Basin is currently used as a source of groundwater by local residents, and the Helix Water District, Lakeside Water District and historically used as a source of groundwater by the City of San Diego. Local water agencies, including the City of San Diego, are currently evaluating the potential for additional development and management of the resources of the Santee-El Monte Groundwater Basin." (See, Bondy and Huntley (2001) Groundwater Management Planning Study Santee- El Monte Basin, Phase III Report for the San Diego County Water Authority.) The City of San Diego has long proclaimed to hold pueblo water rights in this resource to meet drinking water needs of the city. The effects of the proposed project on this valuable public drinking water resource must be carefully evaluated in the EIR and closely coordination with water rights users;

- b. Moreover, the project anticipates using 132 acre-feet of water annually. That equates to approximately 400 residential users. Currently the El Monte Valley supports approximately 200 residential wells. The mine will become the greatest water user in the valley. Given the communicative nature of the Santee/El Monte aquifer, how will the project draw down available water and impact existing water rights, including water necessary to preserve wildlife?
- c. Article 10, Section 2 of the California Constitution requires that, "... the waste or unreasonable use or unreasonable method of use of water be prevented", and that the "conservation of such waters is to be exercised with a view to the reasonable and beneficial use thereof in the interest of the people and for the public welfare...." The public welfare requires that sources of drinking water be preserved for the benefit of all Californians in the face of the existing water emergency. The EIR must evaluate the effects of the proposed project on the basin and whether such effects are reasonable within the meaning of the California Constitution, whether the proposed project unlawfully impairs existing water rights, and whether the proposed project is in the interest of the people and for the public welfare;
- d. Water Code section 13241 requires that water quality objectives be established to ensure the reasonable protection of beneficial uses and the prevention of nuisance and that water quality objectives not be set at a level that would permit water quality to change to such a degree that designated beneficial uses (i.e., MUN) are unreasonably affected. (San Diego Basin Plan 3-1.) The EIR must evaluate whether the proposed project would violate water quality objectives necessary for the reasonable protection of the MUN beneficial use in the Santee-El Monte Basin. Potential effects on water quality include, without limitation, changed groundwater levels, increased TDS, decreased pH and increased arsenic and metals concentrations due to mineral extraction and processing, increases in nutrients from algae growth and water foul use in open ponds, and siltation of surface waters during storm events.
- e. Further, an upstream dairy's operation has included the discharge of large quantities of cow waste over many years. This discharge has lead to a mounding of nitrates under the dairy and which follow the down gradient of the aquifer. The movement of that nitrate is confined in the sand structure. The sand pit will remove a natural barrier to the flow of nitrates and will allow nitrate pollutants to flow more readily into the sand mine pond. This flow will be exacerbated by the proposed project's annual use of approximately 132 acre-feet of annual water. The EIR must address the impact of the project on the fate and transport of these nitrates.
- f. The EIR needs to evaluate whether the proposed project will affect groundwater hydrology in the El Monte valley and impact downstream water tables and surface waters. Studies should be undertaken to determine the

level of communication between various upstream and down stream reaches of the aquifer. For example, Lindo Lake is well dependent. How far does the ground water aquifer originating in the Santee-El Monte Basin extend? How will water use/impacts during extraction effect the ground water level? How will evaporation affect the water table? Will fluctuations in the water table impact existing vegetation both upstream and downstream of the project site which are dependent on ground water?;

- g. The Conservancy has received grants, secured permits for, and is engaged in competitive bidding for restoration of portions of Hanson El Monte Pond through the creation of emergent wetlands and improved flood control. The EIR must analyze how the proposed project will affect the Conservancy's restoration and flood control project.
 - i. How will the proposed project affect both short-term and long-term water levels in the pond?
 - ii. (2) How will the phases of the proposed project, in particular Phase 4, adjacent to the Conservancy's restoration project area affect newly established aquatic and upland habitat plantings and wildlife inhabiting or using such areas, such as, nesting migratory and/or endangered or threatened birds? Potential environmental effects requiring analysis in the EIR include, without limitation, those effects resulting from:
 - (i) Noise and vibration from mining operations and truck traffic;
 - (ii) Dust from mining operations and truck traffic;
 - (iii) Changes in groundwater levels and water quality; and,
 - (iv) Edges effects
- h. How will storm water discharges from the mining site (including the extraction pit) be managed to prevent pollution of surface waters? How will stormwater discharges be directed to the river channel?
- i. Will the extraction activities only remove portland cement grade aggregate or will heavier stones and rocks also be encountered? What will the disposition of these heavier materials be? Will such materials be crushed and further processed?

For the drop structure, the plans show a $\frac{3}{4}$ ton grouted riprap structure, 2.7 ft thick placed on a 1ft deep gravel base that essentially bisects the valley. Please discuss whether the drop structure as proposed meets applicable engineering standards for its intended purpose. The drop structure is intended to keep flood flows from head cutting up the valley. Please study the 100 and 200 year flood year flows as well as anticipate dam failure. The EIR should examine flooding and dam integrity in light of climate change. Virtually all

Global Climate Change Models show that California, and San Diego in particular, will experience warmer and drier winters punctuated by massive El Nino events.

- j. How will the drop structure proposed for the project affect hydrology and water quality in the Santee-El Monte Basin during and after construction of the structure? Will there be effects on the water table and aquifer?
- k. Will dewatering be required at any time for the proposed project? If so, how will the removed water be managed?
- l. Alluvial sand in El Monte Valley both stores and purifies stormwater entering the valley. How will removal of the sand by the proposed project affect water quality downstream? How will stormwater flows be affected with the loss of the retention effect of the sand?
- m. How much long term storage capacity will be lost in the Santee/El Monte aquifer with the implementation of the project? The Santee/El Monte aquifer can be considered a large sponge that captures water, holds it, and releases it slowly over many years either through well pumping or through down gradient flow. The sand mine will put a significant 'hole' in that sponge. A significant number of acre-feet of water will not be held in the sand structure with the mining pit. That storage will be lost. It amounts to a significant amount of important and needed water in a period of climate change where San Diego is predicted to endure increasing long droughts punctuated by a large El Nino year. The Department of Water Resources has designated the Santee/El Monte aquifer as of medium importance. It has also been designated for thorough evaluation as a source of water for San Diego.
- n. How will wash fines from the proposed project be managed to avoid air and/or water pollution?
- o. Where will top soil and overburden be stored on the site and how will it be managed.
- p. Will there be effects on the water table and aquifer via the construction of the drop structure? What will be the effects if the drop structure fails at any time (e.g., during a 100-year flood event or when water spills from El Capitan Dam)?

3. The EIR must evaluate how sand mining activities will affect the short and long term sustainability of populations of species that currently inhabit the Valley.

- a. There are ESA species and migratory birds using or inhabiting the areas at or in the vicinity of Hanson El Monte Pond and/or the proposed project. Will the pressure of 15 years of mining activities in the valley throughout the proposed

phases preclude the long term benefits that may be realized by such species upon cessation of mining and completion of restoration of the final phase?

- b. The San Diego River is listed as a biological corridor. Its importance to species was acknowledge when the Helix Water District developed a plan to place this area in its NCCP. Appendix A is the species list that was developed as part of the recent effort to use the site as a RO recharge area. The proposed project assumes that the habitat in the San Diego River in the area of the proposed project is beyond improvement and restoration by normal means and can only be restored by sand mining most of the site down to bedrock to ensure habitat for the Tri-colored blackbirds. The EIR should be based on a detailed study of the species on the site.

4. The EIR must address how the project will be restores and how restoration will integrate community uses of the Valley.

- a. Are "wash fines" sustainable soil material for the re-vegetation? Three 40' wide benches are proposed to encircle the open water areas of the project using wash fines from the processing plant. This is not an ideal soil condition for growing plants. What is the composition of the project's "wash fines"? Is the reclamation and re-vegetation proposed for the project consistent with existing river reclamation and re-vegetation programs with which it will be linked? Re-vegetation plans need to be based on performance criteria. The re-vegetation plan should include a grading plan that results in more ecological niches (i.e. hydrologic zones) to increase biodiversity. Will the applicant be allowed to import construction and/or demolition debris for re-vegetation? How will this effect plant establishment?
- b. Will the proposed trail easements along the north and south sides of the proposed project area be constructed immediately or during the very early site preparation for Phase 1? How will the proposed trail easements connect to planned trails to the west around Hanson El Monte Pond? A north-south connection between the two road edge trails is needed at the east end of the extraction/reclamation area. This connection must be identified.
- c. If trails are not constructed and opened for use during the beginning phase of the project, the EIR must discuss impacts to the cohesive community character of the valley without such trails and the impacts to overall recreational uses in Lakeside.
- d. How will trails on and in the vicinity of the proposed project be located to enable trail users to appreciate the restored river environment and open spaces (e.g., trail alignments enabling restored upland and pond areas to be viewed).

- e. The Golf Course EIR and MUP required several trail crossings at grade along the San Diego River. Those trail crossings must be maintained to ensure the viability of the trail system for equestrians and other trail users. If an at-grade crossing cannot be made, then a bridging system should be developed to allow trail users to access both sides of the river at regular intervals.
- f. Given the beauty of the El Monte Valley, its proximity to parking at Cactus County Park and the relatively flat grade, and as the trail will follow the river grade, trail use must be studied and anticipated. It is not unlikely that trail use will parallel the trail use at Mission Trails Regional Park or more so. In that case, the trail design must afford a larger tread. The trails should be a minimum of 15-20 ft. wide, or there should be a separated trail for equestrians and another for the other trail users. The 8 ft. wide trail tread proposed by the project does not meet the standards for a County Regional Trail, and given the anticipated use, it should be much wider. The trail width at Walker Preserve in Santee, of 15 to 20 ft. wide, should be the trail standard for this project. Because of the level of use anticipated on this trail, please study the development of a large community parking lot and staging area on the proposed project site.
- g. Will the eastern end of the proposed project, in the area east of the extraction pit, be restored? What is planned for that end of the project area?
- h. The plans associated with this project description describe a 20ft wide trail easement on the north and south sides abutting the boundaries of the project. Unless the slopes, drop structure and pond are intended to be the biological corridor, wildlife movement will, necessarily need to employ the same 20ft trail easement that will be utilized by recreational users. How will the biological corridor functions be maintained?
- i. The project description (page 16, para 5) states extractive operations for 15 years plus four more for final reclamation. It also states that the length of the mining operations is dependent on market demand for the various mined products. This has the potential to result in a much longer period of time. Also, final approval of any revegetation effort should be based on performance criteria not a set amount of time.
- j. The Revegetation Plan should include a grading plan that results in more ecological niches (i.e. hydrologic zones) to increase biodiversity.

5. Other Concerns

- a. Will the proposed project's extraction phases be limited to 15 years, or may the mining project's lifespan lawfully exceed 15 years? The EIR must discuss any such potential.

- b. What legal assurances are being provided to ensure adequate resources are available for the post-mining reclamation and restoration of the site? Moreover, what legal assurances will be provided to ensure an adequate endowment is available for the long-term care of the restored site
- c. The fungus causing Valley Fever, *coccidioidomycosis*, is endemic in El Monte Valley. Spores become airborne when the ground is disturbed. While watering of the ground may reduce dust creation, trucks carrying sand typically disperse dust as they travel at higher speeds on local roadways and the freeway. Additionally, the literature describes rain or other forms of water causing the fungus to grow causing it to become more virulent. Discuss potential for valley fever exposure to residents, workers, and visitors in El Monte Valley and in the surrounding neighborhoods and as sand is transported. The EIR should include an evaluation of the public health risks of the proposed project to such residents, workers, and visitors. In addition, the valley is subject to diurnal breezes. The offshore flow enters the San Diego River Valley in Lakeside at noon and blows continuously to the east throughout the afternoon. That daily breeze will push cocci spores towards Alpine and Blossom Valley. Then in the evening, the direction of the breeze generally reverses and will bring spores towards Lakeside and Santee. Both directions expose populations of significant sizes to cocci. Hikers along the trail depending where they are on the trail, may be exposed to VF on a daily basis. Animals, dogs and horses in particular, are susceptible to cocci. In most instances these companion animals will be found with the trail users and will be exposed as well. An endowment may need to be established for persons contracting VF as a result of the proposed project.
- d. In any statement of overriding circumstances, any assertion regarding the regional need for sand from the proposed project should be evaluated in light of the findings made in SANDAG's "San Diego Region Aggregate Supply Study" 2011, which eliminated El Monte Valley sand from consideration. It is shown on page 2.11 as having resource. The area was removed in map of conserved on page 5.11 and was also removed from consideration because of proximity to residential areas in the map on page 7-17.
- e. Where will mining equipment repair occur? Where will trucks be staged?
- f. What effect on air quality will the proposed project have due to equipment exhaust, particulates (from mining, aggregate processing, transportation, and wind erosion), and otherwise? Will local air quality be impacted? What will be the impact of particulate emissions in the constrained area of El Monte Valley? A cumulative air quality impact study is required. What is the existing air quality in the valley relative to particulates?
- g. Mining projects involve massive changes to the visual environment and if not done properly the impacts to this valuable resource are usually severe. Please

identify all of the visual impacts to the scenic corridor, to residents and to residents who overlook the project in Blossom Valley.

- h. At what point do we get legal assurances of an adequate endowment for the long-term care of the property?
- i.
- j. The EIR needs to discuss a reasonable range of project alternatives, including, without limitation:
 - a. No project alternative;
 - b. Mining just enough aggregate to fund and enable the restoration and trail development portion of the project.
 - c. Restoration, re-vegetation and trail development of the project area without any sand mining.

Thank you for the opportunity to provide scoping comments for the proposed project. If you have any questions, please contact Robin Rierdan, Executive Director, at (619) 443-4770.

Sincerely,

A handwritten signature in black ink that reads "David Tupper". The signature is written in a cursive, flowing style.

David Tupper, Chair
Lakeside's River Park Conservancy

APPENDIX A

Extant biological diversity of plant and animal species found in the project area.

Birds

Common Name	Scientific Name	Abundance	Common Name	Scientific Name	Abundance
Double-crested Cormorant	Phalacrocorax auritus	U	Northern Rough-winged Swallow	Stelgidopteryx serripennis	U*
Great Blue Heron	Ardea herodias	U	Barn Swallow	Hirundo rustica	U*
Snowy Egret	Egretta thula	U	Cliff Swallow	Petrochelidon pyrrhonota	A*
Black-crowned Night-Heron	Nycticorax nycticorax	U	Bushtit	Psaltiriparus minimus	A
Turkey Vulture	Cathartes aura	U*	Rock Wren	Salpinctes obsoletus	U
Mallard	Anas platyrhynchos	U	Bewick's Wren	Thryomanes bewickii	A
White-tailed Kite	Elanus leucurus	C	House Wren	Troglodytes aedon	U*
Cooper's Hawk	Accipiter cooperii	C	Blue-gray Gnatcatcher	Poliophtila caerulea	U*
Red-shouldered Hawk	Buteo lineatus	C	Western Bluebird	Sialia mexicana	U*
Red-tailed Hawk	Buteo jamaicensis	C	Hermit Thrush	Catharus guttatus	U*
American Kestrel	Falco sparverius	C	Wrentit	Chamaea fasciata	C
California Quail	Callipepla californica	A	Northern Mockingbird	Mimus polyglottos	C

			d		
Killdeer	Charadrius vociferus	U*	California Thrasher	Toxostoma redivivum	U
California Gull	Larus californicus	U	European Starling	Sturnus vulgaris	A
Rock Pigeon	Columba livia	C	Phainopepla	Phainopepla nitens	A*
Mourning Dove	Zenaida macroura	A	Orange-crowned Warbler	Vermivora celata	U*
Greater Roadrunner	Geococcyx californianus	U	Yellow Warbler	Dendroica petechia	U*
Barn Owl	Tyto alba	C	Yellow-rumped Warbler	Dendroica coronata	U*
Great Horned Owl	Bubo virginianus	C	Black-throated Gray Warbler	Dendroica nigrescens	U*
Vaux's Swift	Chaetura vauxi	U*	Hermit Warbler	Dendroica occidentalis	U*
White-throated Swift	Aeronautes saxatalis	U*	Common Yellowthroat	Geothlypis trichas	U*
Anna's Hummingbird	Calypte anna	A	Hooded Warbler	Wilsonia citrina	U*
Costa's Hummingbird	Calypte costae	U*	Wilson's Warbler	Wilsonia pusilla	U*
Calliope Hummingbird	Stellula calliope	U*	Yellow-breasted Chat	Icteria virens	U*
Allen's Hummingbird	Selasphorus sasin	U*	Western Tanager	Piranga ludoviciana	U*

d					
Acorn Woodpecker	Melanerpes formicivorus	U	Spotted Towhee	Pipilo maculatus	C
Nuttall's Woodpecker	Picoides nuttallii	C	California Towhee	Pipilo crissalis	A
Western Wood-Pewee	Contopus sordidulus	U*	Lark Sparrow	Chondestes grammacus	U*
Hammond's Flycatcher	Empidonax hammondii	U*	Song Sparrow	Melospiza melodia	A*
Pacific-slope Flycatcher	Empidonax difficilis	U*	White-crowned Sparrow	Zonotrichia leucophrys	U
Black Phoebe	Sayornis nigricans	C	Black-headed Grosbeak	Pheucticus melanocephalus	U*
Say's Phoebe	Sayornis saya	U*	Blue Grosbeak	Guiraca caerulea	U*
Ash-throated Flycatcher	Myiarchus cinerascens	U*	Lazuli Bunting	Passerina amoena	U*
Western Kingbird	Tyrannus verticalis	C*	Red-winged Blackbird	Agelaius phoeniceus	U
Loggerhead Shrike	Lanius ludovicianus	U	Brewer's Blackbird	Euphagus cyanocephalus	C
Warbling Vireo	Vireo gilvus	U*	Brown-headed Cowbird	Molothrus ater	C*
Western Scrub-Jay	Aphelocoma californica	U	Hooded Oriole	Icterus cucullatus	U*
American Crow	Corvus brachyrhynchos	A	Bullock's Oriole	Icterus bullockii	C*
Common	Corvus corax	U	House	Carpodacus	A

Raven			Finch	mexicanus	
Horned Lark	Eremophila alpestris	U*	Lesser Goldfinch	Carduelis psaltria	C*
Violet-green Swallow	Tachycineta thalassina	U*	Lawrence's Goldfinch	Carduelis lawrencei	U*
House Sparrow	Passer domesticus	U	American Goldfinch	Carduelis tristis	U*
California gnatcatcher	Polioptila californica	T&E	Least Bell's vireo	Vireo bellii pusillus	T&E
Reptiles					
Common Side-blotched Lizard	Uta stansburiana	C	Orange-throated Whiptail	Aspidoscelis hyperythra	U
Western Fence Lizard	Sceloporus occidentalis	A	Southern Alligator Lizard	Elgaria multicarinata	U
Granite Spiny Lizard	Sceloporus orcutti	U	San Diego Coast Horned Lizard	Phrynosoma coronatum blainvillei	U
Western Whiptail	Aspidoscelis tigris	U			
Amphibians					
Western Toad	Bufo boreas	C			
Western spadefoot toad	Spea hammondi	Species of Special Concern			
Mammals					

Audubon's Cottontail	<i>Sylvilagus audubonii</i>	A	Woodrat	<i>Neotoma</i> spp.	A
Black-tailed Jackrabbit	<i>Lepus californicus</i>	U	Coyote	<i>Canis latrans</i>	C
California Ground Squirrel	<i>Spermophilus beecheyi</i>	C	Bobcat	<i>Lynx rufus</i>	U
California Vole	<i>Microtus californicus</i>	A			

Abundance codes: A = abundant, C = common, U = uncommon, * = neotropical migrant (meaning at least some, if not all, of the breeding population migrates south to the Americas). T&E Threatened or Endangered

Hingtgen, Robert J

Subject: RE: El Monte Valley sand mining

From: Laurel Tenney [<mailto:laureltenney@gmail.com>]

Sent: Monday, September 14, 2015 9:55 AM

To: Bennett, Jim

Cc: bill.hom@sdcounty.ca.gov; Roberts, Dave; diane.jacob@sdcounty.ca.gov; greg.cox.@sdcounty.ca.gov; ron.robert@sdcounty.ca.gov; LisaFitzpatrick@sdcounty.ca.gov

Subject: El Monte Valley sand mining

My name is Laurel Tenney. I live @13843 Camino Canada in El Cajon. I am writing about the sand mining project in El Monte Valley. Planning and service development reference PDS2015-MUP-98-014W2; PDS2015-RP-15-001; Log number PDS2015-ER-98-14-016B.

Any project that involves our limited water resources needs close scrutiny. This project proposes to divert water from established residents in the valley to a private company to wash sand for private profit. This makes no sense to me. The valley is home to people with horses, who make their livelihood from the peace of the valley itself without stripping resources. Please stop this project, do not let a private venture use public resources for gain. The land will suffer, the water table will suffer and California will be closer to ecologic disaster.

Thank you, Laurel R. Tenney

Jim Bennett
County of San Diego
Planning & Development Services
5510 Overland Ave. Suite 310
San Diego, CA 92123

Subject: El Monte Sand Mine & Nature Preserve PDS2015-MUP-98-014W2, PDS2015-RP-15-001, LOG NO. PDS2015-ER-98-14-016B

September 14, 2015

Dear Mr. Bennett,

The subject of my letter is in regards to the proposed sand mine in the El Monte Valley being operated by the El Monte Sand Mine and Nature Preserve.

My family moved to the El Monte Valley for it's peace and natural beauty, which will certainly be destroyed should the project be approved, at the very least, for the next 15 years. I am 20 years old and thinking that I will live to see the valley destroyed during my lifetime is so depressing. The value of my parent's property is largely based on the view from our home. Who will be responsible for the decline in their properties value? How will the County offset the decline in tax revenue from decreasing property values? What accountability will the mining company be held to and who is going to police them to insure that they are ever going to what they propose? With no accountability there should be no mine. Should this project be approved, it will directly affect my future prosperity and well being. Is this something that you would like a 20-year daughter of yours to have to worry about?

To follow is a list of my concerns about this project and I will cover each individually in this document. My expectation is that your department will take careful consideration of my concerns when completing the EIR and hold the El Monte Sand Mine & Nature Preserve accountable for answering each environmental challenge presented.

My first concern is the destruction of thousands of years of nature at work as illustrated by the photo below of the El Monte Valley as viewed from the West. This is the perspective from my home and I believe gives a fairly accurate outline of the 100' deep sand mine that is proposed.

- What other structures or out buildings will be needed to clean the sand, maintain the heavy equipment, etc.?

The claim that the El Monte Sand Mine and Nature Preserve could dig a 100' deep pit and somehow reclaim nature that took thousands of years to create is completely ludicrous. There is not a single case in San Diego County where any sand mine/ reclamation project has ever been completed. There are two reasons as to why this has been the case. One, there is no system for accountability on the company's part. No accountability to follow the plan that they set for or

accountability that they must complete the work that is proposed. The second reason for this is that it would be impossible for any company to rebuild what it has taken nature millions of years to create. Especially after ripping a 200-acre by 100' deep hole in the earth. The impact to nature will be overwhelming and ruined for many generations. Nature that has evolved so perfectly cannot be recreated by man, and should be reason enough for the company's not passing the requirements set forth in the EIR.

My family moved to the El Monte Valley for it's peace and natural beauty, which will certainly be destroyed should the project be approved, at the very least, for the next 15 years. The value of my property is largely based on the view from my home.

- Who will be responsible for the decline in my properties value?

- What accountability will the mining company be held to and who is going to police them to insure that they are ever going to what they propose?

With no accountability there should be no mine.

I am very concerned about the Health Effects that will be created by the proposed mining of sand from the El Monte Valley. One of which is Valley Fever.

- How will the threat of Valley Fever be contained, and if contracted who will be responsible for lost wages due to illness, medical costs, and continued treatment and monitoring of the disease?

Valley fever is an infection caused by a fungus called *Coccidioides*. The fungus is found in the soil and the spores can get into the air when the soil is disrupted by farming, construction, wind or other activities. When spores are inhaled, valley fever can result. Anyone can get valley fever, but it most commonly occurs in people who are frequently exposed to soil and dust in areas where the fungi are present (endemic areas) and in adults aged 60 and older. The most common way for someone to get valley fever is by inhaling the fungal spores that are in the air following a disturbance in the soil in which they live. Some people may be at higher risk of developing severe infection, these groups include:

- People who have weakened immune systems or have had an organ transplant
- People who are taking medications such as corticosteroids or tumor necrosis factor (TNF)-inhibitors
- Pregnant women
- People who have diabetes
- Certain ethnicities, including Black, Filipino, Hispanic, Native American and Asian. *

*The description above is from <http://travel.gc.ca/travelling/health-safety/diseases/valley-fever>

Valley Fever is known to exist in the soil of the El Monte Valley and will certainly be disturbed by the mining that will take place. Not only from the removal of the soil from the ground, but by the movement of excavating equipment and trucks that are doing the work.

Considering where I live and the location of the El Monte Valley, a Santa Ana wind could carry the disease to 100,000s of people south, including my family and to the west of the valley including the communities of Lakeside, Santee, El Cajon and San Diego.

* I am very concerned about the environmental impacts that will be created through the use of water being used to clean the sand on the site. It has been stated that over 43 million gallons of water will be used in the first year of the 15-year project alone. The water will come from wells drilled on site. Both the short term and long term effects of this kind of water usage will effect not only the inhabitants of the valley, all of which rely on well water for every day use and agriculture, but on the rest of San Diego County.

- Will there be a baseline measurement taken of all the wells in the valley to insure that the plant is not destroying peoples livelihoods and lifestyles?

- Will the sand mine be paying, an impartial contractor, to measure and tests wells on a regular basis for both water levels and contamination?

- What tests will be done during the length of the project to determine down river contamination?

- How will the runoff effect the river below and all the way to the ocean? How will this be monitored?

* I am very concerned about the vehicle traffic that will increase due to the proposed 2 to 500 truckloads of sand that will leave the valley each day. El Monte Road is a small two-lane road and the only access in and out of the valley. The traffic must exit off of El Monte Road onto Lake Jennings Park road to the South or North down Maplevue St. through Lakeside. The resident's inability to leave the valley quickly due to fire will be limited by the truck traffic.

- How will this be accounted for?

Lake Jennings park road is extremely busy and there have been several fatality accidents on the road without the increased truck traffic. There will be a negative impact on young drivers at El Capitan High School and bicyclists on El Monte Road as well.

- What will be done to measure the increased traffic and to insure that safe levels of traffic are not exceeded on any given day or at any given time?

- What will be the rate of inspection to insure safe numbers of vehicles?

- What will the cost be to the County to maintain the roadways after the heavy trucks and equipment do damage?

* I am very concerned about the pollution that the sand mine will create. The pollution will have a negative impact on the environment, people's health and serene nature of the valley. The ozone and dust particulates created by the trucks and heavy equipment will

have a negative impact on children, athletes and the elderly. The long-term effects on the environment include global warming due to the hydrocarbons being put off from the vehicles and equipment operating more than 10 hours per day. We will no longer be able to open our windows to fresh air due to the dust that will be created. The cost of running air and heat year round in our home is unaffordable.

- Who will pay for the increased expense so that our health is not compromised? This is not considering those in the valley that do not have central air and heat. Running my air conditioner is also detrimental to the environment and will increase the amount of greenhouse gasses in the atmosphere that cause global warming. Multiply that times the total amount of households in the El Monte Valley, Blossom Valley and surrounding areas. SDG&E should also be concerned during a high usage alert when I have no choice, but to leave my air conditioner running due to the pollution and dust in the air.

- Will the APCD be consulted to conduct studies in regards to the pollution that will be created?

I believe that they would be interested in the run off of chemicals and contaminated dust particles as they end up in the storm water system as they result of trucks and heavy equipment.

- How will the dust and pollution issues be resolved? Water, a scarce resource will obviously be used in massive amounts.

- Is the mining of sand for profit in our backyard a reasonable enterprise during a time of drought?

- What are the long and short-term effects to the watershed? Sand is already being imported from Arizona and Mexico where the environmental impacts are less. I would suggest reading the study done by San Diego State on sand mines. This is the link: http://threeissues.sdsu.edu/three_issues_sandminingfacts01.html

* I am very concerned about contamination of the wells in the area as well as the aquifer. The contamination of wells throughout the valley due to oil spills and chemicals being used to control dust and clean sand is a concern.

- Where are the trucks going to refuel?

- How will the fuel get to the proposed mining site? Fuel spills are likely. What steps will be taken to insure that when fuel spills happen they will be reported and cleaned up appropriately?

- Is the intention that an enterprise so large self police itself? With truck traffic planned at up to 500 trips per day there will need to be thousands of gallons of fuel on the mining site at any one time. That fuel also needs to be trucked in.

- What steps will be taken to mitigate the danger of driving large fuel tankers through residential areas and past local schools around Lakeside? With access to large amounts of

fuel and agricultural fertilizers nearby, are concerns about acts of terrorism being addressed?

* I am very concerned about the noise that the sand mine will create in the valley. The valley is essentially a funnel for sound. I can hear a dog bark from over 2 miles away at my neighbor's home just east of us. When the mining project at Hanson pond was operating, trucks entered the valley at 5:30 am and the operators of those trucks left them to idle until the mine opened at 7:00 am each morning. The noise was disruptive to both nature and the residents of the valley. The decibel levels coming from the plant as well as the trucks will cause a negative impact on both humans and animals. My right to live in a peaceful valley will be disrupted along with everyone that lives here.

- What sound analysis will be done to insure that noise levels are not loud enough to ruin the nature of the valley?

- Will those levels be monitored daily and throughout the length of the project?

* I am very concerned about the loss of habitat for many species of animals during the mining phases of the project. The El Monte Valley is home to tree frogs, raccoons, quail, road runners, owls, raptors, egret, yellow warblers, the checker spot butterfly, elderberry longhorn beetles, willow fly catcher, red diamond back rattle snake, rosy boa, great grey horned owls, San Diego ring-necked snake, Laguna skipper, Zayante band winged grasshopper, Quino checker spot butterfly, Swallow tail butterfly, Ceanothus moth, several species of sensitive bats, horned lizards, deer, bobcats, golden eagles, redheaded woodpeckers, and endangered species like the least Bell's vireos, arroyo toad and gnat catchers. The valley is also home to many species of plants including oak trees, Sycamores, Chapparal plants, Willows, and Elderberry trees. These plants and animals will either be destroyed or displaced due to the mining. This is a fairly complete list, but a study should be done over several years of both drought and rain to determine all of the species that exist and are active in the valley.

- Some species lie dormant in times of drought so will this be taken into account when determining the length of the study?

The valley is an important wildlife corridor. The mining operation will completely block the valley for the wildlife.

- What will be done to ensure that wildlife has a though fare through the valley?

- What will be done to replace the flora that will be destroyed?

- Will there be a count done of all the plants to insure, that at minimum, the valley will be restored to its current state?

- Will the animals be counted to ensure that their numbers do not diminish as a result of the mining operation?

- How will he sand mining company be held accountable to insure that the land is reclaimed and returned to a better state than it is now?

- Will the sand mining company be granted an extension on their 15-year lease if they have not followed the plan to the letter?

- How will the funding be guaranteed for reclamation once the sand is removed?

It is my opinion that this will be extremely difficult due to the LLC nature of the company itself. There is no accountability. As mentioned earlier, no sand mining company has ever been held accountable for restoration in San Diego County.

* I am very concerned about the loss of trails and access to the area. The El Monte Valley is a scenic destination for horse riders, bicyclists, and hikers. Reducing the amount of recreational space people need to lead active lifestyles and healthy lives will be detrimental to their health. Don't we want people to be healthier? The health costs to the County are already enormous.

- Will the sand mine operation be responsible for those costs?

- Will their contribution to County coffers offset the health related costs to the County?

- Will the county insure that the mining company does what it says and incorporate trails throughout the term of the project?

- Who will monitor this and hold the sand mining company accountable?

* I am very concerned about the water that will be exposed and pooled from digging down to the aquifer. Water warming in the sun is prime breeding ground for vector diseases such as West Nile Virus and Dengue fever, which are carried by mosquitoes. Other concerns include unmonitored public access to the ponds that will be created through mining. The steep sides will be dangerous and drowning may occur. Public safety is paramount and will be jeopardized by the mine. Hanson pond is a good example of how a sand mine turned pond is left in disrepair and unmonitored. Transients have turned it into a campground. The result has been an increased level in crime and a safety concern for my family. Children sneak into the site through fencing in disrepair to swim and fish in the lake.

- Has testing been done on the water in the pond to determine if it is safe?

- If it is not safe, is this not a good example of what we are to expect from the proposed mine operation?

* I am very concerned about the loss of life and property should a flood occur during the mining. Digging a 200 acre, 100' deep pit will create a low spot in the valley where the floodwaters will rush taking with it property, homes, livestock and potentially human life. A similar scenario happened the last time water went over the top of the dam at the El Capitan reservoir. A local valley man lost over 9 acres in the resulting flood. His 9 acres ended up in the bottom of the sand mine of that time.

- What engineering studies will be done to ensure that this scenario is not repeated?

There will be another flood and property will be lost if the mining operation is approved.

* I very am concerned about the loss of Native American artifacts as I have a degree in art and hold these things dear. Native Americans have lived in the valley for thousands of years. Many people have found ancient pottery and tools in the valley.

- What will be done to mitigate the loss of our archaeological artifacts?

- Who will ensure that the mining company reports all artifacts that are exposed?

* Lastly and most importantly, I am very concerned that past EIRs for sand mining and golf course projects will be used to create this new EIR for the proposed sand mine. This is a new project with different scope in a new time and the EIR should contain all new findings.

- How can we as citizens be sure that the old information is relevant and how do we know that what information is used from old EIRs is appropriate or complete?

This is a new project, with new people in a new time. It would be a mistake to not start with a completely new EIR just to save time and money at the County.

I am expecting that all of the concerns I have pointed out will be covered in the new EIR and that you will do your best to insure that the natural beauty of the valley is preserved and the health and safety needs of everyone in the El Monte Valley region are met.

Thank you for your time.

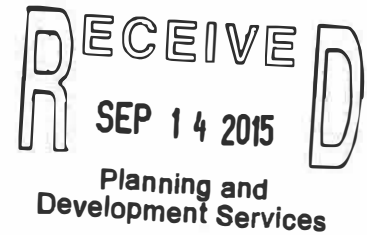
Sincerely,

Lily Garth

13328 Maplevue St.
Lakeside, CA 92040
619-609-9198

County of San Diego Planning & Development Services
5510 Overland Ave., Ste.#310
San Diego, CA 92123

September 10, 2015
El Monte Sand Mining (NOP) of Environmental Impact Report
Public Review
Public Scoping Meeting Comment Sheet



1. This written Comment Form is specifically directed at those in attendance from San Diego County on the Public Scoping meeting on 8/26/15.

My husband, Larry E. Hayes, and I, Linda Hayes have, since 1986 (29 years), have lived on, and payed property taxes for, the property, located at 15466 El Monte Road. I am writing to you in response to the EIR committee's inquiry regarding the perspective and objections, of El Monte Valley residents regarding the proposed "sand mining operation" proposed in the El Monte Valley.

El Monte Valley is one of the last unspoiled valleys in Southern California, and is designated as an official "Scenic Corridor". The proposed sand mining operation is not compatible with the "Scenic Corridor" and will effectively destroy, the current, tranquil quality of life chosen by all of the inhabitants of the valley, as well as thousands of citizens who travel to the El Monte Valley, in order to enjoy the two county parks (Lake Jennings Park, El Monte State Park, and the El Capitan Reservoir that are located in the El Monte Valley. The sand mining project, will also negatively impact the extremely expensive residences of Blossom Valley, who prize the "million dollar views" from their properties above the El Monte Valley.

Although the sand mining project (in order to gain public approval) is called a "Habitat Restoration Project", in truth, before (and if) a restoration takes place, the sand mining project, first, will decimate all wildlife and plant life currently existing in the projected sand mining swath through the valley. Species to be obliterated include several endangered animal species, including the Golden Eagle, and centuries-old California Live Oak Trees that grow, only in very limited areas in Southern California. Animal displacement, of those creatures fleeing their destroyed habitats, onto existing residential properties, will occur. Fleas from mice, squirrels, rats, raccoons, bobcats, cougars, can spread bubonic plague. Poisonous snakes will relocate and be of danger to humans and pets. Our own dog was bitten by a large rattlesnake, that sought refuge in our own fenced back yard, when new neighbors cleared away debris on the land they had purchased. * See attachment re disease

The sand mining will destroy the livelihoods, and property values of all El Monte Valley residents, whose land is currently zoned agricultural, and who depend solely upon their wells for drinking water, for human and animal consumption, as well as for irrigation purposes. Residential businesses will be ruined; such as the many horse boarding operations, wedding and party venues, avian breeding facilities, annual pumpkin patch, and field trip destinations for the many schools who bring thousands of children to experience "the country/agricultural life" etc., who, all, "market" El Monte Valley's peace and tranquility, that is so rarely found today.

The sand mining project by ruining wells, will obliterate El Monte Valley residents' property values, and render the properties un-sellable, (all dependent upon wells). Properties will have no water source, after the sand mining operation drains the El Monte Valley aquifer. This aquifer also provides water to citizens beyond the valley itself. In a time of (by the California governor's proclamation) severe drought and water shortage, burdened with an ever increasing population demand upon existing water resources, it is unconscionable that Mark Weston, formerly the Helix Water district's manager, and now the Chair of the San Diego Water Authority, could sanction a mining project, in a populated area, that will destroy a valuable water resource (the El Monte aquifer) that serves many citizens. It is a conflict of interest for Weston to be in a position of responsibility for the preservation of water resources, and at the same time be involved with the proposed sand mining operation, that will destroy an important water aquifer. Without our wells, we cannot use, nor, will be able to sell our property.

Owners of the sand mining operation should be insured and/or bonded for an amount equal to the property value

loss of El Monte and Blossom Valley residents, to enable payment of claims for property value losses due to lack of water, which will bring about litigations.

There is a strong, constant westerly wind through the El Monte Valley. The proposed sand mining operation will cause the pollution of the air, with airborne contaminants, including the existing (in the El Monte Valley) coccidiomycosis "valley fever spores" to residents to the east of the sand mining project, above the project (Blossom Valley) as well as to the thousands of visitors to the El Monte parks and reservoir, as well as to children attending Oma's pumpkin patch and children on school field trips, to the dairy. Those working on the sand mining project, will stand a chance of contracting "valley fever", who then, can spread that disease to others in their realm of contacts. Blossom Valley residents, will suffer from the same airborne pollution.

The El Monte Valley is bordered by steep canyon walls. As the current residents know, well, sound reverberates off of the canyon walls, so the noise of the proposed sand mining project, machinery and 462- 10-wheel trucks, daily, will cause stressful, noise pollution to all those residents east (down wind) of the mining project, and above (Blossom Valley residents) the mining project, as well. Noise is injurious to humans, animals, and birds.

The El Monte Valley is designated as a "scenic corridor". We residents of the valley are subject to the scrutiny, and must earn the approval of the County, before erecting any structure on our private properties that could be deemed, by the County, as "unsightly" from El Monte Road. The proposed sand mining operation is incompatible with the El Monte Valley's "Scenic Corridor" designation, and should be held to the same restrictions, as are the El Monte Valley residents.

The sand that now filters the water of the valuable El Monte Valley aquifer will be removed to a level of 90 feet. Our own well is currently 80 feet deep. The proposed mining project will last 15 to 20 years, with no guarantee that the mining will end at that point, nor any guarantee that the mined area will actually be restored. Former mining projects have not been restored, and are left as an ugly eyesore. My husband and myself are senior citizens, who sought a life in the El Monte Valley, and will not live to see the end of this project.

As the construction of the dam at the El Capitan Reservoir affectively stopped the movement westward of the sand, once removed the sand will not be replenished, and will leave a mud plain, and a dangerous breeding site for mosquitos and West Nile Virus.

If the proposed mining project lowers the valley level to 90 feet, then all properties upstream (to the east) of the project will be subject to losing our own property (soil) during heavy rains, as our own land will be carried downstream, to the lower area of the sand collection pit. In 1986 a former land owner, in El Monte Valley, owner, to our direct west, stated that he lost 8 acres, of his property, in one heavy rain, when the Nelson-Sloan sand pit was in operation. down stream to his land. Our own fence line to the north, that borders the "riverbed" was washed away when the dam overflowed years ago. We fear that the portion of our land, with which we earn our income, that borders the "San Diego River bed" will be washed down to lower elevation of the mining pits, in heavy rains.

The availability of sand from other sources, and the re-cycling of cement, should mean that is is not necessary to mine the sand in the inhabited El Monte Valley. There are thousands of miles of unused land, in the US deserts, and in Mexico, where sand can be mined without the destruction of the lives of the pre-existing El Monte Valley residents, flora, and fauna.

The mining operation has been described as a 15 to 20 year project, starting at 7:00 a.m., until dusk, daily, excavation being conducted five or six (description varies) days a week, and requiring several hundred, DAILY, ten-wheel truck+trailer trips in and then out of our narrow valley! El Monte Road is a narrow, winding road, already noted for numerous fatal vehicle accidents. Even if the mining project builds its own road down the center of the valley, the traffic will ALL converge at the neck of the valley, creating a nightmare bottleneck! The additional truck traffic will, be hazardous, as El Monte Valley has only one small road for entry and egress. Such increased truck traffic will cause traffic congestion, and a severe danger, to those trying to escape in the advent of

fire.

El Monte River Valley has been the path for countless horseback trail riders for centuries. (Helix is a relatively recent "owner" of the valley.) After the sand mining project is terminated (at a point which some of us will be too old to still be riding horses) horse traffic will be restricted to a (boring) perimeter, multi-use (a dangerous mix for equestrians; bikes, hikers, and horses **are not compatible**) trail. The El Monte Valley has one of the largest horse-populations in the nation; it is truly a shame to rip this popular recreational activity away from so many horse-enthusiasts, who travel from considerable distances, to board or to ride their horses in the El Monte Valley.

Thank you for taking the time to read, and to consider the objections of the valley (El Monte Valley and Blossom Valley) residents, **and** the thousands of people who visit El Monte Valley, who, all, desire to save the resources and integrity of; the El Monte River Valley, as it exists today. In 1986, we were required to obtain a Major Use Permit, to open our small business, and were made to mitigate **all** the concerns of our neighbors, which we did. I hope that the proposed sand mining project will have to thoroughly mitigate **all of the El Monte Valley residents' concerns**, or if they cannot that, that they will abandon the El Monte Valley sand mining project.

Linda and Larry Hayes

Hazy Meadow Ranch & Carriage

15466 El Monte Road, Lakeside, California 92040

619-561-7050

Linda Hayes
Linda Hayes

**HAZY MEADOW RANCH &
CARRIAGE**

(O) 619.561.7050 (F) 206.309.1587

**15466 El Monte Road
Lakeside, California 92040
www.hazymeadow.com**

**attachment re diseases*

My main concerns for the sand mining in the El Monte Valley are the diseases that may be found from the moving around of sand and dirt. These diseases will not just pose a problem for the residents in El Monte Valley and the residents over the hills in Blossom Valley, but may reach residents of other areas like Alpine, El Cajon, Lakeside. It is possible that the diseases may reach communities even further away. The diseases are as follows:

Anthrax is an acute disease caused by the bacterium *Bacillus anthracis*. Most forms of the disease are lethal, and it affects mostly animals. It is contagious and can be transmitted through contact or consumption of infected meat. Effective vaccines against anthrax are available, and some forms of the disease respond well to antibiotic treatment.

Like many other members of the genus *Bacillus*, *B. anthracis* can form dormant endospores (often referred to as "spores" for short, but NOT to be confused with fungal spores) that are able to survive in harsh conditions for decades or even centuries. When spores are inhaled, ingested, or come into contact with a skin lesion on a host, they may become reactivated and multiply rapidly.

Anthrax commonly infects wild and domesticated herbivorous mammals that ingest or inhale the spores while grazing. Ingestion is thought to be the most common route by which herbivores contract anthrax. The carnivores living in the same environment may become infected by consuming infected animals. Diseased animals can spread anthrax to humans, either by direct contact (e.g., inoculation of infected blood to broken skin) or by consumption of a diseased animal's flesh.

Coccidioidomycosis, commonly known as cocci, "valley fever", as well as "California fever", is a mammalian fungal disease caused by *Coccidioides immitis* or *Coccidioides posadasii*. It is endemic in certain parts of Arizona, California, Nevada, New Mexico, Texas, Utah, and northern Mexico.

C. immitis is a dimorphic saprophytic fungus that grows as a mycelium in the soil and produces a spherule form in the host organism. It resides in the soil in certain parts of the southwestern United States, most notably in California and Arizona. *C. immitis* is

dormant during long dry spells, then develops as a mold with long filaments that break off into airborne spores when it rains. The spores, known as arthroconidia, are swept into the air by disruption of the soil, such as during construction, farming, or an earthquake.^[5] Coccidioidomycosis is a common cause of community acquired pneumonia in the endemic areas of the United States.^[1] Infections usually occur due to inhalation of the arthroconidial spores after soil disruption.

Hantavirus normally infects rodents and do not cause disease in these hosts. Humans may become infected with hantavirus through contact with rodent urine, saliva, feces, or bites. Some strains of hantaviruses cause potentially fatal diseases in humans, such as hantavirus hemorrhagic fever with renal syndrome (HFRS) and hantavirus pulmonary syndrome (HPS)—also known as hantavirus cardiopulmonary syndrome (HCPS). HPS (HCPS) is a "rare respiratory illness associated with the inhalation of aerosolized rodent excreta (urine and feces) contaminated by hantavirus particles." In the United States, as of July 2010 eight states had reported 30 or more cases of hantavirus since 1993 – New Mexico (84), Colorado (70), Arizona (62), California (42), Washington (41), Texas (37), Utah (31) and Montana (30).

Yersina pestia is a bacterium that can infect humans and animals. It causes the deadly disease named plague. Human *Y. pestis* infection takes three main forms: pneumonic, septicemic, and bubonic plagues. All three forms were responsible for a number of high-mortality epidemics throughout human history, including: the sixth century's Plague of Justinian; the Black Death, which accounted for the death of at least one-third of the European population between 1347 and 1353; and the 19th century's Third Pandemic. Every year, thousands of cases of plague are still reported to the World Health Organization, although, with proper treatment, the prognosis for victims is now much better. A five- to six-fold increase in cases occurred in Asia during the time of the Vietnam war; possibly due to the disruption of ecosystems and closer proximity between people and animals. Plague also has a detrimental effect on nonhuman mammals. In the United States, animals such as the

black-tailed prairie dog and the endangered black-footed ferret are under threat from the disease.

The information for previous diseases and infections; was found on Wikipedia.com.

Thank you for your attention to our concerns

Linda Hayes

Hingtgen, Robert J

To: Bennett, Jim
Subject: RE: Public Commentary, thank you.

From: Linda Hughes [<mailto:lindahughes08@gmail.com>]

Sent: Monday, September 14, 2015 4:31 PM

To: Bennett, Jim; Mindy.Kohl@sdcountry.ca.gov; Jacob, Dianne; Bill Ray; bill.osborne@uniontrib.com; loganjenkins@utsandiego.com

Subject: Public Commentary, thank you.

COMMENTARY REGARDING PROPOSED EL MONTE VALLEY SAND-MINING OPERATION

Dear Esteemed and Hard-Working People;

Thank you kindly for considering the following, along with with so much other input. I present this commentary from an alternate perspective, one I hope steps back from the finite to offer a look at the situation as a whole. If it hasn't yet been done, I advise the readers to understand there is a story lurking in these facts, and these facts **MUST** be made known to you. There is peril in willful ignorance and/or failure to fully, properly investigate to obtain the information you lack. I speak not about 'peril' as in danger to the environment [though, of course, that figures heavily, has been discussed *ad nauseum*, and will NOT be a topic herein], I mean we do not want a scandal to break wide open over something as simple to dispose of as this.

This is San Diego County: one of the most adored and beloved places to be, **WORLDWIDE**, and we are watched with interest. What's not to like? We are not Palm Springs... not dealing with a scandal (but hold on). Scandal would not be good.

Maybe a local government gets mixed up with a shady character, of questionable reliability and lack of verifiable references, over a deal the government permitted, which ruined a pristine valley and the lives of its long-time inhabitants, netted the guy millions in illegal land-grab and subsequent sales of mining rights (to whom- or whatever), and to top it all in the public-relations blot, would be that all who signed on-board to the sand-mine will be remembered as having given the thumbs up to wasting *milions and millions of gallons* of purest WATER, during times of severe drought.

Yes, **WASTING WATER!** When there are legal, but moreover, moral and ethical reasons to conserve water, and the sustaining of **LIFE** is top-priority for its usage, the world will be amazed and dumb-founded that so much of this precious resource is put to privately-profitable use washing sand out of dirt.

Gee, the county must really be getting some **HUGE BENEFIT** from giving out the permit [or this is too moronic for words]. Here is the benefit: The county gets the opportunity to purchase the sand at market prices, along with everybody else. [...] It is likely to get stuck paying for damage to infrastructure et al, as a bonus.

Kindly understand how late this is being written, and how little independent research I have done. The following is based on hearsay, but, as retired deputy public defender, it's sure that people talk a lot more freely than they write it down or testify to it. How you investigate now may impact what happens to your legacies.

God be with you.

- * Cannot verify anything about El Monte Valley Nature Preserve, nor its purported owner.
- * The entity involved w/trying to get the golf-course going is the sand-mining approval-seeker here. As such, when things fell through, Entity threatened a lawsuit against land-owner Helix, which "settled" by way of guaranteeing money for Helix and 3 years to buy the land for Entity. Except this is an end-run attempt to avoid the required notice regarding the sale of publicly-held property and solicitation of bids therefor. This was merely a lease agreement, to begin.
- * Contractual provisions are so loose and sloppy and unspecific in detail that the rights to the mine may be "assigned" (sold, transferred), so now whoever buys in has no true privity w/county, and little interest in toeing the compliance and promise-fullfillment lines, many of which are vague, like: "to be developed at a later date," or are "subject to change." After all, even if the one-time-a-year inspection gets them in trouble, all that happens is they "may get issued a violation". Big Deal. Pay a fine. Yeah, check's in the mail...).
- * Whoever was using heavy equipment on the original golf-course work violated county codes right off the bat. Same Entity now assures everything will be taken care of.
- * There are several people watching and scrutinizing actions, dealings/relations, quotes of MICHAEL BECK. All I know, personally, is that he is of importance to Supervisor Jacob; others believe anything he says or does supporting this project is a conflict of interest based on information they have gathered.
- * A gent who videos, with fire in his eyes, is embarking on a campaign to ... "visit precincts in Helix Water District" to petition for its board's recall, and see what shakes loose inside the Water District headquarters.

This is most respectfully submitted. If there is anything I may assist with, do let me know.

Very truly yours,

Linda P. Hughes

12005 Rocosco Road

Lakeside, CA 92040

(619)443-2121

Planning and Development Services

Reference:

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

Attention Jim Bennett

5510 Overland Avenue, Suite 310

San Diego, CA 92123

Date

Sept 11, 2015

RECEIVED
SEP 14 2015

Planning and
Development Services

Dear Mr Bennett,

I am writing to offer my thoughts and ideas about the scope and nature of the environmental impacts that can and will be caused by the El Monte Valley Sand Mining Project. I ask that these concerns be thoroughly considered in the preparation of the Environmental Impact Statement.

This project will negatively impact:

My well WELL
My property value
My farm animals
My life - FIRE pit
My legal rights of a
homeowner and tax
payer
My Grandchildren's future
My Health! - no Valley
green?

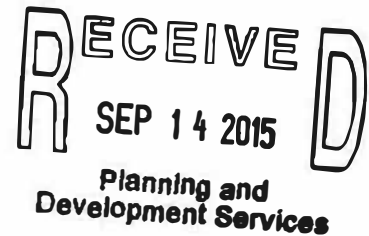
Sincerely,

Dinda Nickerson 11315 Rocky Lakeside
Signature Print Name Address City
619-913-1749 Phone: Email: Lnickerson1@cox.net

☐ Please check if you comments extend to the back side of the page.

September 11, 2015

Jim Bennett, Project Manager
Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123



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

Dear Mr. Bennett:

Thank you for the opportunity to comment on the scope of the EIR for the above referenced project. I have several comments regarding the August 13th NOP.

SUBSEQUENT EIR/BASELINE. Page 3 of the NOP says that, pursuant to section 15162, "[S]ubstantial changes are proposed" in the project resulting in one or more "new significant environmental effects." In fact, the original, 15 year-old EIR for the golf course included a sand mining project as an alternative, but that alternative was rejected by the Board as not fulfilling the purpose and need for the project, and not being environmentally superior. The "purpose and need" for this project is different from the golf course project. Not only is the purpose and need different, but the location is different. The previous project would have occurred on 460 acres. The proposed project occurs on 530 acres. Thus both the purpose of the project and the project site differ. It is not clear why a subsequent EIR was the choice, rather than an entirely new EIR.

Normally, the reason to prepare a subsequent EIR rather than an entirely new EIR is that the amount of documentation that the public and the decision-maker must wade through is reduced. Streamlining is desirable, but it is questionable if that will be accomplished in this case. Instead, the public and decision-makers must refer to a lengthy 15-year-old document for a different project on a different footprint, and try to determine how that analysis relates to the current analysis and what has been left out. It is unclear that this approach streamlines anything; on the contrary, it seems to lengthen and complicate matters, making a comprehensible consideration of the impacts of this project almost impossible.

This issue may also be relevant to considerations made in the determination of baseline. However, case law indicates that the hypothetical water consumption of approved but not constructed development does not constitute an appropriate baseline. This would be true whether the project is addressed in a subsequent EIR or an entirely new EIR. For this project, regardless of the type of EIR, the golf course level of water consumption is not an appropriate baseline. "Current conditions" is the appropriate baseline. Indeed, the water consumption associated with the golf course is one of the reasons that project failed. Subsequent to the previous EIR, the project was modified to bring in treated sewer water to try to salvage the project. Water issues, expenses and complications associated with the project resulted in its failure and subsequent law suit.

The EIR for the golf course indicated that impacts would be mitigated to below a level of significance. However, that mitigation never occurred. Some of the impacts have been exacerbated over time, and some have been mitigated on their own, but the fact that mitigation was never implemented should be considered. It is difficult to see how treatment of this project under a subsequent EIR does not amount to “piecemealing” of projects, to allow impacts to occur under one guise, and then switch the project to a completely different project.

PRE-EIR MISINFORMATION AND TERMINOLOGY. People can use any name to which they are legally entitled; however, “Nature Reserve” seems a misleading name for a sand mining consortium. Furthermore, misleading terminology was used by the project proponents during months and years of aggressive pre-EIR publicity. For example, all sand mining projects must have a reclamation plan, but for this project the as yet unwritten reclamation plan was described as “restoration” back to “pre-dam conditions.”

“Restoration” implies returning a site to its previous biological function. Given the pre-EIR information and publicity, the historic condition of the site should be evaluated to determine if the proposed project will reflect pre-dam conditions. Pre-dam conditions included continual sand input into the system, which has now been stopped. It did NOT include mining pits, lined with impermeable yellow-fill. Pits meeting the needs of sand extraction and yellow-fill disposal are a constructed system, not a natural system, even if native cattails are planted on the benches. The misleading term “restoration” should be deleted from use in CEQA documents if the project is not returning the site to a previously naturally existing system.

New terminology for disturbance was coined in the pre-EIR publicity materials. Virtually all of San Diego County has been subject to anthropogenic disturbance and supports non-native species, even in highly valued habitat areas. The word typically used to describe such habitat areas is “disturbed.” The pre-publicity on this project called the site “degraded in the extreme,” a description that appears to be both inaccurate and unique to the pre-publicity for this project. The pre-publicity materials that were sent to agencies and advocacy groups provided maps suggesting that the site is devoid of habitat value.

The site has in fact been subject to prior disturbance, as has virtually all of San Diego County, including parts of the County with very high habitat values. For example, some valuable vernal pool sites were previously in agricultural use. Furthermore, river habitats are disturbance-adapted habitats, making them especially resilient. However, the pre-publicity in essence served as a preliminary environmental impact report concluding that there would be only a few short-term, negligible impacts, but that project would have long term benefits. Given this description, and given that this question of short term and long term impacts/benefits is one that must be addressed in CEQA documents, this EIR should impartially address this issue. There are two parts to the issue: 1) is it really a “short term” impact with a “long term” benefit, and 2) is it a long term benefit at all.

With regard to question 1, the pre-EIS information describes impacts as “short term.” When the project was previously proposed, with the reverse osmosis component, it was “only” going to be for 8 years of operation. Now it is supposedly for 15 years. In what context is a 15 year impact considered short term? While certain activities are often described as “temporary,” when they

have a finite term measured often in months, it is not common practice to qualify the impact by the expected life of the development. On the Internet, I visited a real estate site that had a raging debate going about realistic life expectancy of a condominium development, and had numbers ranging from 30 to 80 years. Would a residential development with a 30 year life expectancy be considered to have “short term” or “temporary” impacts? I’ve seen several EIRs for landfill expansions providing a dozen years or so of capacity, but have not seen even the traffic impacts of such a twelve year project described as “temporary.” Furthermore, staff has said in public meetings that they understand that once a permit is issued, it is very likely that additional permits will be issued, and the project will continue beyond 15 years. Without a permit sunset in 15 years with some enforceable provision assuring there is no possibility of renewal, suggesting that any of these impacts will last only 15 years is unrealistic. Additionally, many of the impacts are permanent. For example, once the sand is removed from the riverbed, its water holding capacity will forever be lost and the aquifer will be forever altered.

For the proposed project, will there be a permanent impact on water resources as a result of increased evaporation and lowering of the water table? How will the termination date proposed be enforced, and by whom? Is “short term” an accurate description of the nature of the impact, or will in fact, the project site be permanently altered? Will agricultural uses return to the site? The project description lists a permit expiration of 2035. I am 54 years old right now. I will be 74 years old in 2035. I will be directly impacted by the project. Needless to say, I do not consider this a short term impact.

With regard to question 2, is the proposed reclamation with yellowfill-lined pits, permanently altered landscape, existing systems completely removed, and replaced with holes that have standing water, is that outcome, should it happen exactly as described in the optimistic planning for this project, environmentally preferable to the existing habitat and wildlife corridor and thus a “benefit”? A realistic comparison with other southern California river valleys should be made to determine the habitat value of a disturbed system such as this. For example, Tijuana Estuary is a National Estuarine Sanctuary. Substantial grant money has been spent removing non-native species. No disturbances such as grading for a golf course have occurred. Yet the riparian corridor at Tijuana Estuary may be comparable to the one on the San Diego River in El Monte Valley in that it supports many nonnative species, including tamarisk. The presence of non-native species and the fact of previous disturbance do not remove the value of an area – if it did we might have no important preserve areas at all in the County. A comparison of species richness, diversity, support of rare species of the project site with other comparable Southern California river valleys should be made to provide an accurate appraisal of the value of the existing wildlife corridor. The descriptions in the pre-EIR publicity should not be repeated without fresh evaluation.

AGGREGATE IMPACTS. SANDAG’s San Diego Region Aggregate Supply Study identifies and evaluates aggregate resources for transportation projects. Sand mining interests, such as Crystal Howard of EnviroMINE, Inc, which is working on behalf of the project proponents of this project, and Michael Beck from the Endangered Habitat League, a partner of the proposed project, served on the advisory committee for SANDAG’s study. On page 6-6 the study provides recommendations for providing a more positive image of sand mining, an unusual

component of a resource study. The study seems almost intended to promote this project, which it mentions specifically. While it is not a CEQA matter to address the potential conflicts of interest of the preparers of government planning documents who are also project proponents with a financial interest in a project, it is a CEQA matter to consider planning documents, and it is relevant to consider if those planning documents are appropriately objective.

Despite the proponents' involvement in the study, the study found that there are "ample sources of the necessary rock to meet the anticipated future demand," although El Monte's resources are desirable fine sands (whereas beach sands are, per the study, too fine). Furthermore, the graphs within the study show steadily declining annual use of aggregate since 1999, perhaps as people use materials other than aggregate, which has one of the highest greenhouse gas impacts of any construction material. So although the study concludes that aggregate for transportation projects is in great need in the County, there may be other interpretations of the findings.

According to the SANDAG study, the average size of a sand mine in San Diego County is 150 acres, including undisturbed lands and setbacks. The study also identified the goal of extending the life of existing mining operations. The proposed project is significantly larger than the average sand mine. Would this proposed large sand mining project have economies of scale that would put existing, smaller operations out of business? Would this result in impacts associated with premature closure of existing facilities, contrary to the environmental goals of the SANDAG study and local plans to protect a 50-year supply of aggregate? Would it thwart the recommendation to research the "viability of establishing smaller aggregate sites" with short trip distances? Would the project result in environmental impacts associated with the waste of remaining aggregate resources after operations are suspended after "only" 15 years of mining?

The first goal of the project is to "maximize the recovery of a wide variety of construction aggregate in a safe and efficient manner." Does the 15 year term of the proposed mining operation conflict with this goal? Does the production of inexpensive virgin materials from a massive mining operation with excellent economies of scale promote the waste of recyclable aggregates, such as demolition debris and materials dredged from drainages and from behind dams? If the project does not meet the financial expectations that are considered necessary to support reclamation, will the project continue beyond 15 years?

How often are reclamation plans implemented without being altered? How often are reclamation plans successful?

Would this proposed project keep the price of virgin materials low so that it continues to be uneconomical to recycle demolition concrete and materials dredged from drainage channels and from behind dams, as reported the SANDAG study? Would this project contribute to the exportation of aggregate from San Diego to Riverside, as reported, but not quantified, in the SANDAG study? How much sand is currently being exported from San Diego to Riverside? Would this project increase exports from Southern California to Asia via the Port of Long Beach? How much aggregate is shipped out of the Port of Long Beach? Would this project result in cumulative impacts and environmental justice issues with one area, Lakeside, hosting more than a third of the extraction facilities in the County?

LANDUSE. The pre-EIR materials assert that the project is consistent with planning documents such as the San Diego River Master Plan, County Trails Master Plan, Multiple Species Conservation Plan, County General Plan, Lakeside Community Plan, Tricolored Blackbird Conservation Plan, and County Climate Action Plan. Indeed, the project proponents have spent years entering the project into as many planning documents as possible. While the appropriateness of project proponents using influence and position to prepare planning documents and a land use framework that specifically favors this project may be beyond the scope of CEQA consideration, the appropriateness of using these documents to determine the significance of impacts of the project is certainly relevant. Will these planning documents still provide unbiased overriding goals that the project may be inconsistent with? For example, would the project divide the community in the Valley, making exchange between residents on the north with residents on the south difficult? Would the project be consistent with overall goals of reducing carbon emission if it promotes development using high carbon emission cement dependent on massive mining of virgin aggregate? Would the project be consistent with Lakeside Community Plan's circulatory goals with the proposed traffic on El Monte Road and Lake Jennings? Would the project temporarily or permanently change the existing agricultural land uses of the Valley? Would the proposed project be inconsistent with existing horseback therapy programs in the Valley that serve children with disabilities? Would the project be consistent with the mission statements of all of the river conservancies to prepare a recreational area along the San Diego river for the enjoyment of the highly important, scenic San Diego river? Is putting trails through a construction site, boxed between a berm and a roadway, with no access to the river consistent with planning documents, goals, objectives and mission statements?

Much has been made of the zoning of the site, and also the potential for CEQA related impacts associated with building over the top of aggregate resources. It is not known at this time what alternatives will be proposed, but would any alternative place a development over the top of the sand in the floodplain? If not, wouldn't all alternatives be consistent with the zoning?

Would agricultural uses be impacted by the proposed project? With farm-to-table curricula becoming important, and "local sourcing" an issue, how important is this area as an agricultural and educational resource? How sustainable is oat hay production in the Valley – considering the inputs and irrigation and transportation impacts of alternate fodder sources. How would the project impact the educational activities conducted by the local schools in the Valley? How would it impact the programs for children conducted by the dairy? What historical agricultural uses occurred here? Is agricultural use a long term benefit that would be destroyed by a short term gain?

Have any Native Americans groups been contacted? Local residents have found arrowheads and other artifacts in the project area. Are there any important archeological sites in the area?

HAZARDS. Mining operations cause high levels of noise and vibration, which can lead to safety hazards. Would vibrations caused by mining and processing equipment and trucks increase risks of liquefaction for surrounding residents? Would it result in destabilization of boulders above the riverbed? Would it have an effect on the dam? Would it have an effect on the reptiles of the Valley, and other organisms that are especially sensitive to noise or vibration?

Excavation associated with mining operations can expose natural and man-made contaminants. The footprint of the operations includes an existing hazardous materials dumpsite, the documentation for which is available in Helix Water District files and has been discussed in public meetings. Would mining in the footprint of a hazardous materials disposal site expose the air, ground and/or surface water to contamination? Is there a plume of nitrates below the surface of the Valley associated with the dairy? Would excavation in the vicinity of the dairy expose the air, groundwater, or surface water to contamination from the dairy? Will the loss of the sand's filtering abilities expose surface or ground water to contamination from dairy waste or chemicals from the dump site that exists within the extraction footprint?

Are there naturally occurring constituents of the subsurface that would be dislodged and result in contamination of the air, ground, or surface waters? How frequently does this happen, and does pre-mining coring always identify such hazards? Are there residential, recreational and agricultural uses surrounding the project site that rely on the groundwater resources that would be impacted by the project?

EPA regulations for reservoirs require that they be covered to protect water from contamination in runoff. Helix Water District treats the water before it distributes it, but local residents do not treat their well water. Would exposure of the groundwater to the atmosphere remove the filtering capacity of the existing overlying sand, thereby exposing the aquifer and downstream surface water to contamination?

The project would include heavy trucks on a narrow country road that has no shoulder or sidewalk. Bicyclists, equestrians, walkers and joggers frequently use this road. The project would occur within an existing wildlife corridor. It is not uncommon to have to stop on this road and wait for a covey of quail to wander across. What provisions for wildlife crossings, pedestrian, equestrian, and bicycle safety are proposed? Would heavy traffic in this location fulfill the goal of "safely" extracting resources?

With regard to the safety of this project, the project is going to have significant traffic impacts on El Monte Road. El Monte Road is one-way in and one-way out for residents and recreational users. The valley is prone to both fires and floods, and is in the dam failure zone. Residents have themselves and livestock to evacuate, often on very short notice, or, in 2003, with absolutely no notice what-so-ever. Having evacuated horses from the Valley in 2003, I can only imagine how much worse the situation would have been if I had been threading my horse trailer past sand trucks on the one and only road out of the Valley. Would the project impact evacuation routes or otherwise exacerbate the fire and flood hazards for residents and recreationalists? Would it delay emergency response time into the Valley?

One of the most common recreational uses in the valley is boating on the reservoir. Drivers of trucks and SUVs pulling power boats using El Monte Road are not generally characterized as unusually patient drivers. Indeed, most drivers find themselves in a hurry from time to time. When they pass slower-moving vehicles on rural county roads, they pose a special hazard – not only to other drivers, but also to equestrians and bicyclers enjoying the gentle grade of this scenic roadway. What threat will be added with slow, heavy, sand-laden trucks? Has the special nature of the existing uses of the roadway been considered? Will one of the potential mitigation measures be putting half of the traffic on Willow Road?

The proposed project would establish pits that are 90 feet below the current grade. The dam occasionally releases flood flows during storm events in years with heavy rain. Natural flows and flows exacerbated by release from the upstream reservoir tend to level out topographic features in the Valley, historically resulting in braided streambed through a broad sand flat, with regular modifications of the river course. Benches graded by the proposed project would likely be modified during flood events, and sediment from higher areas would likely fill ponds. Without hardening the entire Valley, how does the project propose to prevent the Valley from restoring itself naturally, thus eliminating the artificial features claimed to be “restoration”? Without continuing input of sediment from the dam, would flood flows scour upland areas toward the pits? What hazards could result from project-related erosion within the floodplain?

The proposed plan would dispose of 5000 cubic yards of unusable yellow-fill in the pits. Some estimates are significantly greater for the amount of yellow-fill that may be present. Would the stagnant water in the yellow-fill and debris-lined ponds raise the population of mosquitoes above existing levels, even if non-native, invasive gambusia are introduced? If so, what threat would diseases carried by mosquitoes pose to bird life, other wildlife, domestic animals, livestock including horses, and humans?

The pre-EIR materials assert that there is no threat of asbestos or other health hazard associated with expected emissions. What emissions would be associated with mining equipment, trucks, processing equipment, PM₁₀ and other particulates, and would there be any dangerous components, such as hazardous materials in the known hazardous waste disposal site located within the proposed excavation footprint, that would become airborne and cause health problems to wildlife, domestic animals, livestock, humans, including sensitive receptors at the park and school immediately west of the project site? In evaluating Valley Fever, which is known to occur at the site, will the impacts on wildlife and domestic animals be considered as well as impacts on sensitive receptors and the human population in general? How will the children with disabilities who come to the Valley for horseback therapy programs be affected by the dust and noise of the proposed project? Is excavation of a site known to support Valley fever consistent with the goal of providing “safe” resource exploitation?

Would the proposed habitat add fuel in the case of fire events and would it be consistent with the function of the area as a floodway? This project will increase demand on regional water supplies over existing conditions, including those needed for emergencies such as fires. What effect will the project have on public safety?

NOISE. A 1,300 foot setback from residential areas is considered in the County’s guidelines to mitigate noise. Receptors that are higher than a noise source often experience less attenuation over distance than those at the same level or below. Would the proposed 100 foot setback in this bowl-shaped Valley, in which sound travels very well, be sufficient to mitigate noise impacts to surrounding residents and recreationalists? Would it be consistent with planning documents? Would it result in impacts to livestock and domestic animals, and birds, dogs and exotic animals that may be raised by local residents? What effect will it have on surrounding wildlife, such as least Bell’s vireos and gnatcatchers? Have “pre-impact” day and night sound monitors been established to estimate mammal and amphibian activity as a baseline in advance of the proposed work? Will post-impact monitoring be done? If post-impact monitoring shows a significant

impact on the natural sound levels, basically muting the bird, bat, insect and amphibian calls, what mitigation will be possible after the fact?

What is the existing “soundscape” of the Valley? What effect would the presence of an industrial site have on the behavior of horses when they are being ridden in the Valley? What effect would the project have on the therapeutic riding facilities that are located in El Monte Valley, facilities that cater to children with disabilities?

WATER. The SANDAG study, in describing sand mining in El Monte Valley, highlighted wastewater purification and recharge of the eight-year project. The project is now a 15 year project with no recharge. The SANDAG study describes an “effort to develop a new, permanent water supply source by augmenting the water in the El Monte Valley underground basin with highly purified, recycled water.” However, as proposed, instead of recharge, the current project is expected to directly consume 132 acre-feet of water per year. In addition, it would expose the ponds, that are reclaimed from the mining pits using yellow-fill and other materials that are not acceptable for cement production purposes, to evaporation. In addition to direct use of water for dust suppression and aggregate processing, the project would result in losses resulting from evaporation and from physical processes that may drop the water table once the sand overlying bedrock is removed. I have heard a description of an underground dam that holds water in the basin for use by local wells that would be destroyed by this project, as would the water-holding properties of the sand.

The project proponents for the golf course, which are the same proponents for the sand mine, showed their complete lack of understanding of the existing, natural hydrology of the San Diego River, and in fact most natural Southern California rivers, but installing “silt fences” after conducting grading operations - to keep sand out of the riverbed. The measure was an unwarranted expense, showing complete lack of understanding of the fact that the “river” is located 40 feet below grade, and is covered with 35 to 40 feet of sand. The silt fences were an inappropriate mitigation measure. They were not effective at preventing any sand from returning to the riverbed; however, that is not a bad situation, since the natural condition is a shifting course through a sand flat. Over time, the plastic fences have blown here and there. The waste has never have been collected. The plastic has done nothing but cause plastic pollution. It has not prevented the sand from moving during rain events, as it naturally does in such a system. The fact that these project proponents would leave the land graded and un-restored, and would leave plastic silt fence to cause plastic pollution in a wildlife corridor, suggests the level of responsibility that can be expected. This is pertinent when considering how effective and prompt the mitigation measures proposed by the project proponents will be.

Since the previous EIR was certified, the State has undergone a significant drought period. The State legislature has enacted legislation requiring protection and regulation of groundwater resources. This aquifer is mapped as one of the aquifers requiring regulation. The City of San Diego oversees El Capitan reservoir, located at the head of El Monte Valley. The City also oversees San Vicente, and other major local water infrastructure. The City has commented on activities at Hanson Pond that may have an impact on the aquifer. It is not clear from the State legislation which agency will be responsible for regulating groundwater in El Monte Valley. That entity should be one that has the best interests of the aquifer as its primary concern, and

should not be tied to a particular project in any way. In some areas of California a county government is exercising such control, but that may not be appropriate here, given relationships with the City and with the San Diego County Water Authority.

How does the new legislation alter what is considered an appropriate use in a mapped aquifer? How do agencies with the best interest of the aquifer influence land use decisions in El Monte Valley? Which agencies have authority? Who has rights to the water? How much water does the County use? How much water does Helix use? How much water do local residents use? What has the groundwater table looked like overtime? Is it currently being overdrawn? What is the quality and what has the trend been in water quality? What effect on water quality and quantity would the project have? What recourse would people have if their wells are ruined? What will that do to the recreational, residential, and agricultural uses in the Valley? How would hydrological alterations impact biological resources, habitats, and surrounding residential and agricultural wells? If impacts on local wells and septic systems are mitigated with piped water and municipal sewer connections, what effect would that have on likely densification and development of the surrounding areas after reclamation is complete? Would the project have a permanent impact on water resources in exchange for short term benefits associated with sand mining?

BIOLOGY: Ideas about proper stewardship of biological resources change over time. At one time deserts were considered wastelands, nothing but a good place for mines and other destructive uses. Now, although the value of the fragile system has better appreciation, deserts are still often seen as the perfect place for destructive energy facilities. Wetlands were once considered disease-ridden problem areas, and people were encouraged to fill them in. Now people are encouraged to take perfectly functioning upland habitat and turn it into wetland, even in places where no wetlands ever naturally occurred. Biologists caution that created wetlands have limited values compared to natural wetlands, but the regulations try to compensate by merely upping the ratios. Similarly, at one time people were encouraged to plant trees in places where trees never naturally occurred. People planted tamarisk like crazy. Now land stewards aggressively remove tamarisk, even when it is being used by wildlife, and even with the approach of a beetle that selectively feeds on and destroys tamarisk. Has an estimate been made about when biological control for tamarisk will arrive in this area? Have studies such as this one been considered? <http://www.sciencedirect.com/science/article/pii/S1049964409001170>

As explained in this article about kudzu <http://www.smithsonianmag.com/science-nature/true-story-kudzu-vine-ate-south-180956325/?no-ist> our thinking about biological stewardship is often more dogma than science. Under CEQA, complying with regulatory structures may or may not mitigate impacts. A thorough, unbiased consideration of environmental impacts is intended to guide decision making and encourage effective mitigation and/or environmentally superior alternatives.

Salt flats, mud flats, and sand flats provide distinct soil parameters that are important to wildlife. The project proponents might see such habitat types as “denuded,” but they are in fact important biological resources. Soil organisms often have very specific moisture and nutrient requirements and have different tolerances for toxic materials. Soil organisms are often highly interdependent, so that different life forms may provide critical benefits of biomass production and nutrient

cycling on the site. There is a fungus, for example, that is specific to the understory of mature oak trees, such as those in El Monte Valley. Has the unique soil biota of the Valley, including legless lizards and unusual soil organisms, including a phosphorescent earthworm and numerous important fungi, been documented? What is the role of plant residue decomposers and mycorrhizal fungi in the existing system? The existing substrate will be processed into cement, will it be reproducible? What effect will the project have on invertebrates and on nocturnal organisms, including night insects, bats, and amphibians? Does the sandflat support arroyo toads? Did it in the past? What are the requirements for arroyo toads, and has this type of habitat been declining over time?

In the pre-EIR publicity, the project proponents plan to introduce tricolored black bird habitats in the mining pits. Tri-colored blackbirds may in fact be a native species that can exist in a manufactured system. Rice paddies in the Central Valley have, when managed properly, provided enough simulation of that region's tule marsh habitat to support tricolored black birds. Tri-colored blackbirds have been documented at a San Diego landfill. However, other mining pits, such as the 197 acre pit reclaimed for the Otay Valley Quarry Reclamation Plan have not been suitable, nor has Hanson pond.

Hanson pond is not suitable for tricolored blackbirds because it only has a fringe of cattails around the sides, and then plunges quickly into open water. Tricolored blackbirds require a wider area of shallow water – at least 100 feet wide – in order to be sufficient for colony establishment. Therefore, unless Hanson Pond is significantly modified, it cannot serve as Tricolored blackbird habitat.

In considering the relative value of the site as tricolored blackbird habitat, there are a few pertinent questions. Was the site ever tricolored black bird habitat? Does the region support a significant percentage of the extant population of the species? Is a yellow-fill lined pit, with introduced, invasive gambusia to mitigate mosquito populations, a healthy and appropriate habitat for tricolored black birds? Will the topography of the pits be sufficient to provide the shallow, cattail marsh required for colony establishment? Is this topography consistent with other habitat requirements, flood control requirements, and other purposes of the site? Will the pits attract not only mosquitoes, but also bull frogs? How effective are gambusia at reducing mosquito populations? Are gambusia themselves an invasive non-native? What effects would bullfrogs have?

The "Restoration Overview" distributed by the project proponent claims to benefit the very species the project would impact. It lists Cooper's hawks and other residents of the Valley. Unfortunately, there are no assurances that yellow fill-lined ponds will provide habitat for these species. Nearby Hanson's pond has not been mined in many years, yet these years of restoration opportunity that have not been fulfilled. The pre-EIR information claims to benefit the very species that will be impacted. The EIR should assess the actual impacts, and correct misunderstandings based on pre-EIR materials. Have other aggregate reclamation projects been successful at creating the habitats this project proposes?

Will dust control efforts, sand washing, and other water uses at the site attract Argentinean ants, which would then out-compete native ants? Would this be a further impact to the horned lizard,

in addition the grading and removal of habitat and of existing individuals of the species? Would workers be likely to “take” individuals if they found them? What impact would direct “take” of wildlife such as lizards and snakes by workers have?

Most river corridors serve as wildlife corridors. Does the existing Valley serve as a wildlife corridor? Would the proposed project convert the existing wildlife habitat to industrial use? What provisions would be made to provide a wildlife crossing for amphibians, reptiles, birds, mammals, insects, and other animals crossing El Monte Road? Will wildlife also flee the site to the north, increasing mortality with existing traffic on that road, and necessitating a wildlife crossing for Willow Road, as well?

The project would produce an estimated 5,000 cubic yards of unusable fines, also known as yellow-fill, to be deposited in these pits before they are “reclaimed.” How effective is silt and clay mined from the site, but not usable in the cement production process, at promoting biological habitat when disposed of in pits?

The site currently supports old and young oaks, sycamores, willows, elderberry, and other native species; why does the proposed revegetation mix not include any of these species? Will any of the many existing landmark trees on the site be destroyed? If not how will their root systems be preserved if the mine will be taking the grade down 90 feet? Have the many native annuals that bloom, different varieties in different years, been inventoried? Will these rare and beautiful organisms be restored to the site at the end of the mining operations?

Nationwide, loss of pollinators is becoming a serious concern. Even in the driest months of the year, abundant pollinators are present in the Valley. Have these pollinators been inventoried? What effect would the proposed project have on the wide variety of annual and perennial plants the insects depend on? Would this contribute directly or cumulatively to impacts on any one species or on pollinators as a whole? Is this a particular concern in an agricultural area?

Will the herbicides proposed for weed removal enter the waterway? Will soil amendments be required to get anything to grow in yellow fill? Will soil amendments contaminate the waterway? What will be done with the existing “biological overburden”? Is sand mining a short term benefit that would be conducted at the expense of permanent damage to a vital wildlife corridor?

REHABILITATION FOR DISTURBED LANDS. The California Department of Conservation, California Geological Survey produced a document entitled “Rehabilitation of Disturbed Lands in California: A Manual for Decision Making.” Under the authority of Resource Agency and with the State Geologist, written by the Department of Conservation, Office of Mine Reclamation and V.P. Claassen from the University of California, Davis, “[t]his manual focuses on moderately to severely disturbed lands, such as those commonly associated with mining. These lands do not rehabilitate naturally in the short term because their topsoil has been altered, inverted, or lost.” It explains that “the degree of soil development can be an important factor in determining rehabilitation potential... Disturbed soil is often mixed from multiple horizons, which results in the disruption of soil structure and chemistry and the dilution of beneficial soil

organisms and biota.... Coastal sand dunes and riparian woodlands ... are adapted to frequent and/or high levels of disturbance and exhibit considerable resilience.”

The manual explains that disturbed soils have lower infiltration rates. Indeed, the project proposes to remove the permeable materials and leave only the much less permeable, fine-sized yellow-fill. “However, soil is the foundation on which a rehabilitation project is built.... Each of the horizons in a generalized soil profile ... contributes something to the soil’s ability to support plant cover.” The manual discusses the importance of determining the target pore size, which, in the case of the proposed project, would be the pore size of the baseline (existing) condition. Will the proposed project mimic the natural pore size of the soils? Will the project approximate the existing particle size and texture? Will the heavy equipment on the site result in compaction of the soils?

Studies have found that compacted soils may persist in a desert setting for more than 100 years “and that vegetation patterns may reflect compaction patterns. Newton (unpublished data) demonstrated on a wetland site that the level of compaction significantly affected the resulting recovery and vigor of the wetland vegetation Soils with high organic matter content are less susceptible to compaction because organic matter holds the soil particles apart so that they don’t pack and adhere so tightly together. Soils with low organic matter content or high sand and clay content are especially susceptible to compaction, since even small amounts of clay can tightly pack between solid sand grains and bind the soil tightly together. Tillage or deep ripping of a compacted soil will open up cracks in the soil profile, but without further development of the soil structure these ripped soils will often settle and repack within a year or two.” These studies bring into question the assertion that the mining operation will have only “short term” impacts, and also highlight the challenges associated with reclamation. What will the effect of the project be on permeability of the site? Will the soils be compacted? What effect will post-mine soil conditions have on the ability to rehabilitate the site?

In addition to particle and pore size, the chemical characteristics of soil are vital. What is the current, baseline pH of the soil? What is the existing cation exchange capacity of the soil? What is the current salinity of the oil? What is the current nutrient availability in the soil? Will the proposed pits mimic these conditions?

The State’s rehabilitation manual recommends examining the soil of nearby areas to develop a model for soil regeneration. “This local model will provide an example that integrates the local climate, geological material, terrain, and biological activity that provides a realistic comparison for establishing adequate soil nutrient levels and selecting potential revegetation plant species and soil microbes. Which nearby soils will be used as reference soils?

“Various projects have sought to create a soil from mixtures of fines (silt and clay), organic matter (compost, sludge, wood chips), and other additives such as gypsum or lime. These sites may grow some vegetation initially; however, studies indicate that their long-term (in excess of 30 years) viability is in question” Will monitoring and maintenance of the site be of sufficient duration, and will there be sufficient funds to repair long term damage? Since the damage may be virtually impossible to repair 30 years after the mining operation has stopped, what measures will be implemented to prevent this kind of long term failure?

Dust suppression is at odds with proper soil treatment. “If soil materials are to be harvested, moved, stored or worked during the construction or mining phase, it is important that these activities occur when the soil materials are dry. Wet or damp soils are easily compacted and smeared and will be less able to grow plants than if they were handled when dry. Bacterial and fungal spores and plant seeds are also in a resistant state of their life cycle if the soil is dry and are more likely to survive the moving process.” How will the need to avoid soil compaction be balanced with the need to provide dust suppression? What will be done to salvage the delicate soil organisms in the Valley?

“Many of California’s rehabilitation projects take place on unusual parent materials such as serpentine soils and mine waste, presenting a number of challenges to the rehabilitation planner . . . Mine wastes can be inhospitable to plants because of poor quality physical ‘soil’ characteristics.... Mine wastes typically lack any type of soil structure, which can lead to long-term compaction problems...[may} lack CEC, organic matter, and essential nutrients, and because they have either a high (alkaline) or low (acid) pH . . . [and] may also be significantly higher in metals.... Mine wastes are usually devoid of soil macro-organisms and the essential microorganisms. What will be done to avoid these long term complications?

According to the State rehabilitation manual, soil erosion can be reduced by using existing contours (or reestablishing original basin topography), using existing drainages (or reestablishing original drainages), and minimizing slope length and steepness. Grading practices on mine sites tend to create smooth, finished slopes, which are not conducive to plant growth and tend to exacerbate soil erosion. How will the need to extract millions of tons of sand be balanced with the need to preserve existing contours and avoid steep slopes?

When evaluating the success of a rehabilitation project, typically a reference site is selected. Will the east end of the project property that is not proposed for mining serve as the reference site? “The reference site should be located as close to the project site as possible, within the same elevational range, on the same type of soil, and with the same aspect and climate. In addition, the reference site should match the target vegetation proposed for the project area: it should be dominated by the same type of vegetation, habitat, structure, and species composition.” At what frequency and to whom will reporting on be made on the plants, soils, erosion, and other factors? Would impacts to soil resources be permanent, in exchange for short term benefits associated with sand mining?

GHG. What is the role of concrete in GHG production – as in what percentage of GHG production results from concrete production? Would a shift to other materials reduce GHGs?

The SANDAG study concluded that sources of aggregate closest to urban centers resulted in the shortest trip distances and hence the lowest GHG emissions. It did not evaluate how options associated with trucks providing backhaul, the existing US Mexico conveyor belt, use of recycled demolition concrete, or use of dredge materials would affect GHG emissions. If the purpose and need for the project is to “provide cement in an environmentally beneficial manner,” these alternatives should be investigated. Would tighter markets for virgin materials result in

increased use of recycled options? Would higher cement costs result in a shift to materials with lesser GHG footprint during production?

According to studies on Biosphere II, concrete was a primary reason for the failure of this experiment. This talk by Jane Poynter about “What Lessons Came out of Biosphere II” provides a summary <http://www.npr.org/programs/ted-radio-hour/?ft=nprml&f=57&showDate=2015-09-04>. Although GHG emissions associated with manufacture were not factored in, oxygen consuming properties of the material made it impossible for the plants to keep up. As oxygen level diminished, so did the cognitive abilities of the participants, as well as their interpersonal relationships. Although a life cycle analysis of the product is not warranted in a CEQA document, and general consideration of the GHG and other atmospheric impacts associated with the project, which has as a purpose the production of vast quantities of concrete, in a market where local aggregate producers say they have no market, is relevant. Would the production and use of vast amounts of this material result in a short term benefit with a long term cost?

RECREATION: The existing Valley is heavily used for recreation by many users. Have the uses and users of the Valley been identified? Have they been notified or the proposed project and asked for input on the scope of the EIR? Since the local rock face known as El Cajon Mountain, known locally as El Capitan, has been compared with El Capitan in Yosemite Valley, how would sand mining in this scenic Valley effect:

- Climbers on the mountain?
- Hang gliders over the area?
- Boaters headed for the reservoir?
- Mountain bikers.
- Users of the County staging area?
- Users of El Monte Park?
- Users of the trail system, including the trail the Blossom Valley and the Flume Trail?
- Street bicycle use on El Monte Road?
- Equestrian use on El Monte Road and in the riverbed?

Existing equestrian use of the sand flat provides an opportunity for riding in areas that are not desirable to pedestrians and mountain bikes, but that provide safety to equestrians. It is one of the few places left in the County with good footing and safe conditions for cantering. Will this existing condition be eliminated? The existing situation has been described as “no trails,” but the reality is that several roads were put in during the days when grading for the golf course was done, including a highly compacted road usable by hikers and mountain bikers as well as equestrians. Additional roads through the sand have been put in by biologists and hydrologists conducting studies for this project, and several informal trails exist throughout the area. There are abundant existing trails. In preliminary trail meetings with Crystal Howard, the need for trail systems consistent with the goals and mission of various public agencies and river conservancies to provide river access to multiple trail users has been established. TWO trails, one with existing sand as the substrate, which is the existing condition, is less expensive, and is preferred by equestrians, and one with a standard trail substrate for joggers, walkers and mountain bikes has been discussed as the appropriate approach in this area.

Recently in Tijuana Estuary a “horse only” sandy trail was “improved” by the County with importation of decomposed granite. That improvement resulted in use of the trail by mountain bikers, which resulted in a bike-horse collision, which resulted in the horse rider sustaining a compound fracture. What assurances are there that two trail systems will be maintained, and that the sand substrate of the horse portion will not be altered during non-discretionary routine maintenance in the future?

With regard to the “temporary” nature of impacts, fifteen years of standing in a stall, waiting for the temporary impact to be over with, is a long time. In feral herds, horses walk more than 20 miles in an average day. Horses that run in circles are more prone to tendon and joint problems. How would this “temporary” loss of trails impact the health and welfare of existing horses in Valley? Would the trails options in the Valley be forever limited by this project, resulting in a long-term impact for a short-term benefit?

ALTERNATIVES. A key factor in determining alternatives is a strong understanding of the purpose and need as it pertains to public benefit. The project proponents will most likely rely on the findings of the SANDAG study to suggest that the purpose and need for the project is sand for the production of cement. However, use of the site for cement production must be weighed against its importance as an aquifer, wildlife corridor, habitat, scenic resource, recreational resource and other uses. The SANDAG study found that there were ample aggregate resources in the County. Also, the analysis may determine that the proposed project would not, in fact, “maximize” the use of aggregate resources. The fifteen year operational life would “recover” only a portion of the resources present, while providing economies of scale that could result in the closure and loss of smaller, existing resources, and the waste of more expensive recyclable alternatives. Thus, even alternatives that do not involve sand mining may be as effective at ensuring the “efficient” use of aggregate resources. Using the site as habitat now, rather than waiting for 15 years of mining, would allow the existing habitat to remain, and would prevent the premature closure of smaller mines, and may very well be environmentally superior.

The problem is that the real purpose and need for the project is not related to public benefit. The legal settlement provides for Helix to sell the land to the sand mining consortium at a set, below-market price. The consortium plans to recuperate within 15 years the millions of dollars associated with the failed golf course, with the lengthy litigation against Helix, and to gain sufficient revenue to provide for reclamation activities and an endowment for the restored area sufficient to maintain the area. This is a hefty expectation from the proposed project, and one that is not related to public purpose. Therefore it should not be considered in the environmental document.

Helix Water District is currently the landowner, although it is not the project proponent. If the property reverts to Helix, which under some conditions of the settlement could happen, Helix can use the property for any public purpose. Given the value of the site as habitat and its importance to the regional trail system, local land use conservancies would consider the settlement price that is being paid by the sand mining consortium an excellent value. Thus the option of retaining the property for its habitat and recreational value, with no sand mining, should be included as an alternative.

TO SUMMARIZE SOME OF THE QUESTIONS FOR CONSIDERATION: Will there be irreversible impacts to water and agricultural resources? Is this project a trade-off between sustainable, renewable agricultural use, habitat, and recreation, for excessive, and possibly unnecessary quantities of cement? Would the production of large quantities of building materials be growth inducing? Will the project result in a net reduction in the water currently available for other uses in the region? Will the project result in less sand, and thus less storage and filtering ability, for users of the aquifer? Will the project have a negative impact on any existing wells, either in quality or quantity? Will the project result in the increased potential for diseases in people or in wild of domestic animals? Will the project result in a tradeoff between exploitation of a limited, non-renewable resource at the expense of other, renewable resources, such as agricultural and recreational lands? Will the project result in contributions to carbon emissions by producing massive quantities of a non-renewable building material with a greater carbon footprint than other materials? Will the project discourage recycling of construction and demolition debris by flooding the market with virgin materials instead of promoting the use of recycled materials? Will the project result in the destruction of existing, self-sustaining, natural habitat for an un-natural, maintenance-requiring habitat that does not now exist in this river valley? Will the project result in disruption of a wildlife corridor? Will the project have impacts on raptors, bobcats or other sensitive species? Will the project expose residents, wildlife, or recreational users of the valley to unsafe conditions? Will the project diminish the existing recreational value of the valley? Will the project diminish the existing scenic value of the valley to the public? Will the project impact any oak, sycamore, willow or other landmark trees? Will the project impact the historic values of this farming valley? Will the project impact any area of significance to Native Americans? Will the project reduce the acreage of land available for agriculture? Will the project contribute to existing congestion on local streets and state highways? Will the project result in a deterioration of the area's air quality? Will the project expose ground water to the surface, allowing for evaporation and contamination? Will the project contribute to flood, traffic, evacuation, or fire hazards for residents or recreational users? Will the project expose naturally hazardous soils, such as those containing asbestos, or soils contaminated by dairy runoff, or soils contaminated by dumped wastes?

Thank you again for this opportunity to comment on the scope of this EIR. I look forward to reviewing the draft.

Sincerely,



Lisa F. Wood

BA Biology, University of California at Berkeley; Advisor Wayne Sousa, Disturbance Ecology
MS Biology, San Diego State University; Advisor, Joy Zedler, Wetland Ecology
619-938-0758

Hinataen, Robert J

Subject: RE: El Monte Sand Mine & Nature Preserve

From: Marguerite Digenan [mailto:margepiincharge@gmail.com]

Sent: Monday, September 14, 2015 10:55 AM

To: Bennett, Jim

Subject: El Monte Sand Mine & Nature Preserve

My concerns for this sand mining project are as follows:

I am concerned about the noise, dust, and the rise in ozone levels due to the mining activities and truck traffic that will be associated with this project in the El Monte Valley. These problems will not only effect the residents of the El Monte Valley but this has far reaching potential.

As a resident of the upper east end of the valley, I hear, every summer the fire works at Sea World, during football season I can hear the cannon fire during Charger games and tSky Show at Qualcomm Stadium. This valley is narrow with steep sides this will only be exacerbated by digging the valley at least 90 feet deeper. The noise from the project will echo and reverberate not only up the valley but also down the San Diego River corridor as well. The building of berms will not solve this problem and may even intensify the noise and echo.

The dust and ozone will collect and be trapped in the deep cut valley. This will cause many adverse effects for people, animals, and plant life. The poor air quality may have possible effects on nearby neighborhoods and schools. Matt La Chappa Little League field, Cactus Park BMX track, Pony League and Softball fields, El Capitan High School campus, its sport practices, game and Physical Education areas are directly down the San Diego River Corridor

A new EIR needs to be done for this project. The EIR that exists is ancient, irrelevant to this project and done by Enviormine which has obvious conflicting interest.

Thank You for your consideration and time on this matter

Marguerite Digenan
15836 El Monte Rd
P O Box 122
Lakeside, Ca 92040
margepiincharge@gmail.com

From: [Vilia Baird](#)
To: [Hingtgen, Robert J](#); [Bennett, Jim](#)
Subject: CEQA comment
Date: Monday, September 14, 2015 9:27:29 AM

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

Attention Jim Bennett

09/13/2015

Dear Mr. Bennett

I am writing to offer my thoughts and ideas as to the nature and scope of the environmental impacts that can and will be caused by the sand mining project proposed by El Monte Nature Preserve LLC. I ask for your serious consideration and investigation into the following matters when preparing the Environmental Impact Statement.

-loss of a very significant aquifer due contamination and evaporation when exposed to the surface. The sand that is the center of this project is a vital part of the natural ground water filtration, storage and distribution processes and in effect removing the sand will affect the natural environments ability to both filter and store water in aquifer significantly.

-what would the impacts to the water quality of the aquifer be when its capacity is reduced and the natural subsurface water is exposed, by removal of the sand, to sunlight, bacteria, microorganisms, and disease vectors like mosquitos. All of which would render the water non potable and although San diego imports a majority of its water resources, it would be a crime to risk this valuable resource.

-what are the potential and real impacts of the project on the residential and agricultural wells both upstream of the project in El monte Valley and even more the wells both private and public downstream of the project, that provide water to Lakeside and Santee.

- the city, county, private groups and the taxpayers have spent millions of dollars restoring and improving the San diego River corridor from Ocean beach to Mission trails, what are impacts of this project on that investment.

-impacts of removing natural alluvial soil from the river bed on the valley's ability to support life both natural and agricultural. Currently the valley is one of the more verdant areas of San diego, reducing the quantity and quality of the naturally occurring soil will reduce the valley's ability to sustain it current agricultural productivity and beauty.

-impacts on fire protection and prevention in the valley. the valley is a box canyon with one paved two lane road and a dirt road that accesses the north side of the san diego river. This situation is just adequate enough for residents to evacuate during the Cedar fire, now add 250 plus 80 ton trucks a day to the traffic equation. By reducing the valley's water holding capacity and availability fire protection will be more difficult and increase the amounts of dry material and thus, fire potential.

-what noise impacts will there be to local wildlife and residents. The a open space with unobstructed lines of sight and the acoustics in the valley make sound travel farther and with more intensity. Sensitive wildlife will be driven away by heavy equipment and plant operations.

-impacts on native american dwelling and burial sites. there is at least one surveyed burial site near the project on willow rd. what surveys will be done on and around the site to ensure cultural and historical artifacts and/ or sites will not be damaged before breaking ground.

-impacts of the project bisecting the valley effectively closing wildlife access corridors across the riverbed. El monte valley has a variety of wildlife from coyotes ,lynx and fox to hawks, golden eagles and tricolored blackbird cutting the valley in half at the riverbed would irreversibly alter wildlife behavior and migration

-loss of habitat for raptors, owls and bats in the riverbed. removing the vegetation that exists in the project work area will drive any and all wildlife from their established nesting or den sites.

-onsite fuel storage and fueling impacts. Where and how will fuel and combustibles be stored and disposed.

-what impacts will the project have on the scenic corridor that is the El monte valley

Thank you for your attention

Sincerely,
Matthew Baird

Matthew and Vilia Baird
14661 El Monte Rd.
Lakeside, Ca 92040
(619)677-7992
(818)388-6577
bairdmatt2000@yahoo.com
viliabaird@gmail.com

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

Attention Jim Bennett
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Dear Mr. Bennett:

Thank you for the opportunity to comment on the scope of the EIR for the above referenced project.

I will keep my letter short and focus on one environmental/community health issue. How will you prevent Valley Fever from occurring to the residents of El Monte Valley?

I personally know of the devastation this disease brings. My father contracted it from working on a dirt race track up on the Barona Indian Reservation in the 1980s. It almost killed him. To this day he still takes medication on a daily basis because he has never been cured.

The sand mining project will subject all the humans and animals to the disease.

Please do not allow the sand mining project to proceed.

Thank you, Melinda Setterman

10635 vista Camino

Lakeside, CA 92040

619 937-5061

melindasetterman@cox.net

Hingtgen, Robert J

Subject: RE: El Monte

From: Michael Miller [mailto:plumbmkm@msn.com]

Sent: Monday, September 14, 2015 3:23 PM

To: Bennett, Jim

Subject:

Planning and Development Services

Dare 09/14/2015

Reference:

PDS20 IS-M UP-9S-0 14 W2, PDS20 IS-RP-15-00 1, LOG NO. PDS20 15-ER-9S-14-0 1GB

Attention Jim Bennett

5510 Overland Avenue, Suite 310

San Diego, CA 92123

Dear Mr. Bennett,

I am writing to offer my thoughts and ideas about the scope and nature of the environmental impacts that can be caused if the El Monte Valley Sand Mining Project goes any further. I am requesting that these concerns be thoroughly considered in the preparation of the Environmental Impact Report.

I have lived in Lakeside for the past 60 years. Back when it was safe for kids to roam about all day without a care in the world. Traversing the many trails, many that are no longer available for public use. Crossing streams and meadows, catching sight of native animals of varied species, as they hunted for meals, raised their young, barely escaped the clutches of predators or ended up a being a meal themselves..... Nature at its best, right here in Lakeside!!!

This project will negatively impact (not in any particular order):

The almost incalculable amount of ground water, which will be lost to evaporation, from the proposed 161 acre sand pit pond. With the loss of that vast amount of water, the valleys water wells, that draw their water from the El Monte Valley/Santee aquifer, will most assuredly produce a lower ground water level, causing the wells to dry up completely. Also with the exposed water, more likely for the chance for contaminants to enter the water system!

The first thing that residents and visitors alike will see as they enter the El Monte Valley will be a hole in the ground... approximately one and a third miles long by one third mile wide!!! Even with the inadequate amount of native revegetation, that's being proposed, people will always remember "The Hole" in El Monte Valley!!

The greenhouse gas emissions from a diesel powered truck is horrendous even on fairly level ground, just think of the amount, when under a load of 25 tons of aggregate, climbing the grade of Lake Jennings Park Road for more than a half mile!!! If the project does get approval, how about requiring the use of natural gas powered trucks, their greenhouse gas emissions are less than half of diesel engines, yet the power output is the same and they are less expensive to operate than diesel!!! The EMNPLLC posted a statement about the greenhouse gas emission estimates, of diesel trucks hauling aggregate from Mexico into the U.S. How the savings in fuel costs was worth destroying El Monte Valley, between trucking from Mexico and trucking from Lakeside to the surrounding aggregate users in San Diego County.

Thank you,
Michael Miller
11223 Posthill Road
Lakeside, CA. 92040
619-443-4115

Hingtgen, Robert J

Subject: RE: El Monte Sand Mine & Nature Preserve

From: mildred digenan [<mailto:mdigenan@gmail.com>]

Sent: Monday, September 14, 2015 10:23 AM

To: Bennett, Jim

Subject: El Monte Sand Mine & Nature Preserve

My concerns for this sand mining project are as follows:

I am concerned about the damage to the natural aquifer that is El Monte Valley. This is the third largest aquifer in San Diego County, It is irreplaceable. It cannot be mitigated. The damage that will be done by the sand mining is irreversible. As the sand miners open the center of the valley the aquifer will be irreparably reduced in size, the wide opening will allow the exposure of the underground water. The water will then be lost to evaporation and contamination.

This also creates a great fire danger in the area with the loss of the aquifer as the valley becomes dryer. This not only effects El Monte Valley but also Moreno, Lakeside. Blossom Valley and Alpine. Fires in t he El Monte Valley are especially dangerous because of the one way in and out mature of the valley, the electrical towers causing an inability of air drops in many areas and the steep terrain.

A new EIR needs to be done.

Thank you for your consideration and time in this matter.

Mildred Digenan
15836 El Monte Rd
P O Box 122
Lakeside, Ca 92040
mdigenan@gmail.com

El Monte Sand Mine & Nature Preserve

PDS2015-MUP-98-014W2, PDS2015-RP-15-001

Notice of Preparation (NOP) of Environmental Impact Report

Public Review Period

August 13, 2015 through September 14, 2015

PUBLIC SCOPING MEETING COMMENTS

September 13, 2015

Mr. Jim Bennett
County of San Diego
Planning and Development Services
5510 Overland Ave, Ste 310
San Diego, CA 92123

Mr. Bennett,

Please find below my list of concerns pertinent to the EIR for this project:

1) Water quality for existing residents. Whereas the proponent has stated in their own documents they plan to dump all the effluent not usable back into the 90' deep pit in the ground, and whereas the water table is at 30' below grade, therefore it can be expected that any contaminants within the effluent not limited to nitrates and nitrites from existing and older agricultural uses, and some heavy metals which are prevalent, would therefore be free-floating and then miscible with the existing water in the aquifer. I and some hydrologists with whom I've spoken believe this will not only pose a problem to the immediate families in the area, but also to any who derive their water source downstream from the project, including Lakeside Water District and Helix.

2) Water levels for wells within the valley and surrounding neighborhoods. Sand mining is a heavy water user for dust mitigation. And water table could drop as the extraction process lingers on for years. Families, businesses and farms who

have Riparian Water Rights, by right must not have their water rights forfeited by a Discretionary Plan and if so, residents must be made whole into perpetuity so as not to have to carry any of the burden, financial or otherwise, for the proponents of this project.

3) According to the Scenic Highway Element, Section 1, Part VI, of the San Diego County General Plan, as revised by General Plan Amendment (GPA) 86-03, Item 7, Desert Subregional Plan, and that it was approved by the San Diego County Planning Commission on the 10th day of October, 1986 (GPA 86-03), El Monte Rd. and Willow Rd. are both listed and classified as Designated Scenic Roads, which by the further language in the document, thereby designates all of El Monte Valley as a "Designated Scenic Viewshed" or corridor, and needs to and must have the rights and protections as specified within the County's own General Plan and by the State of California's Scenic Highway and Roads stipulations.

4) As a Lakeside Community Planning Group member for the last almost five years and now the Chair, I have seen many projects come before our board which have rightly been turned down because they did not fit within the size, bulk and scale of the character of the community in which the project was located. This, in accordance with the General Plan most certainly DOES NOT fit within the rural, agricultural, equestrian and residential character of this community and also, exactly flies in the face of the rules governing the "splitting" of a community and needs to be addressed as so.

5) As attached in the email containing this document, I have included photographs, taken by myself, of rich archeological findings within El Monte Valley. Items such as morteros and pestles and natural grinding locations located under some of the older oak trees. This valley, as evidenced in "The River of Tears" is an archeological treasure trove with historical significance that cannot be overlooked. All due diligence with regards to the remains of the original Viejas people shall not be overlooked, or rather, shall be treated with the utmost of importance and reverence.

6) In the matter of using the old EIR and just supplementing it; this needs to NOT

happen. The old Golf Course project, as approved, would have had minimal impact and disturbance to the land, soil, water, traffic and would have blended nicely with the community character. THIS project, however will have MAJOR impacts on EVERY aspect of life, property, water rights, traffic, dust, noise, infrastructure and peaceful enjoyment of the community's resources such as El Monte Park and El Capitan Reservoir. There needs to be a thorough and complete NEW EIR as this is a completely new and 100% different project than the one previously approved. The only similarity between this project and the old one is the location. All else is different and has MAJOR negative impacts upon the community. Whereas the old project would have been a boon.

7) Whereas there is nothing within the proponents plan which shows a guarantee or method by which they plan to keep their end of the bargain to restore and then maintain the "habitat" they will have created at the end of this sand mining operation, an endowment and trust needs to be set up for future West Nile abatement, trail maintenance, and general upkeep of the property for the future generation of San Diegans who would otherwise have the beauty of this valley taken from them forever by a 200 acre, 90' pit in the middle of an otherwise pristine parklike environment.

8) Infrastructure: El Monte Rd. is a curvy, winding road with blind curves and also is narrow. It is frequented by bicyclist, horseback riders, El Capitan High School athletes who do their training, boaters and anglers, hikers, photographers, artists, and park goers. It is not set up for the type of heavy, industrial traffic which is to be expected once a project of this magnitude begins. So there are severe safety concerns for the citizens of the community who use this road. And nor are any of the connecting roads, including Maplevue, with all its school kids and traffic, nor Lake Jennings Park Rd. Especially with the foreseeable projects coming to the area around the 8 Freeway at Lake Jennings capable of handling this traffic. One fix would be to have to improve Willow Rd and have 50% of traffic leave that direction to ease the impact on El Monte, Julian, Maplevue and Lake Jennings. However, looking forward, none of these roads are fit for this type of project, as all that truck traffic will be severely impacting every residential neighborhood within and surrounding these roads.

9) Flood Control: The sand in the river acts as a natural “sponge” as it were, to help hold back and slow the velocity of runoff when we have large storms within our region. Once there is a 200 acre place where all that water can pick up momentum exists, it is surely foreseeable that flooding can most likely occur downstream. Therefore, a flood mitigation plan must be put into place to compensate all those who might be caused harm due to this project’s future impact upon its neighbors downstream.

10) Other concerns listed, but not limited to, include: Valley Fever, Trails, Dust, Noise, negative use of existing property rights and devaluation of said property, thereby lowering the tax base for an entire region of a community, Loss of business and possible bankruptcy for existing businesses in The Valley, Loss of business and harm to our already existing, local sand miners who will suffer severe economic impacts.

Thank you for your time and concern,

Warmest regards,



September 13, 2015

Signature

Date

Milton Cyphert, Chair, Lakeside Community Planning Group

Printed Name

8927 Lakeview Rd

Address

Lakeside

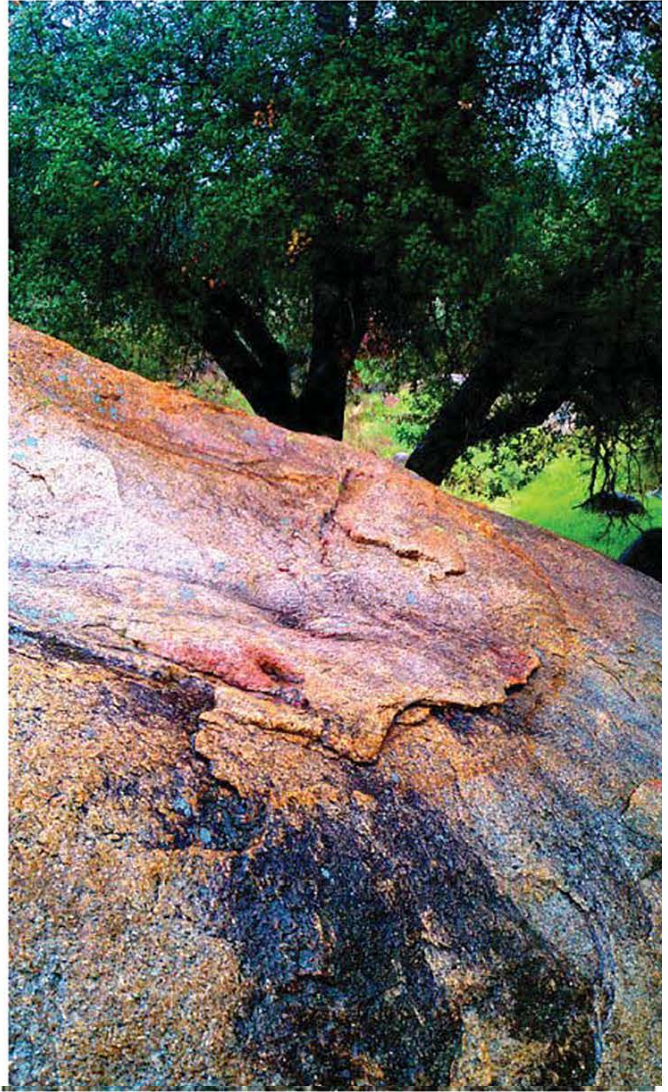
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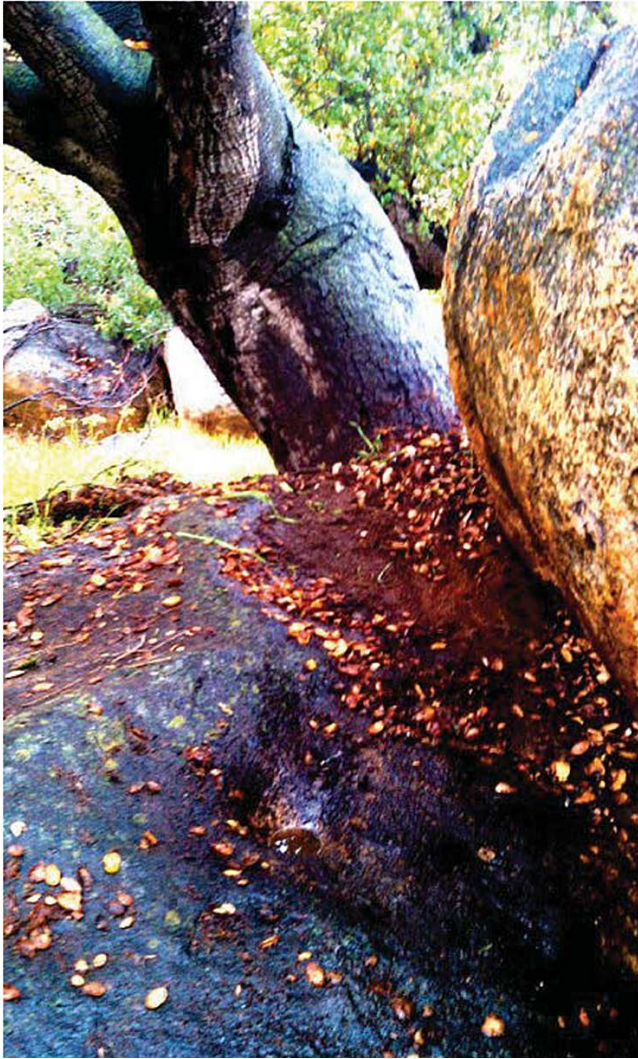
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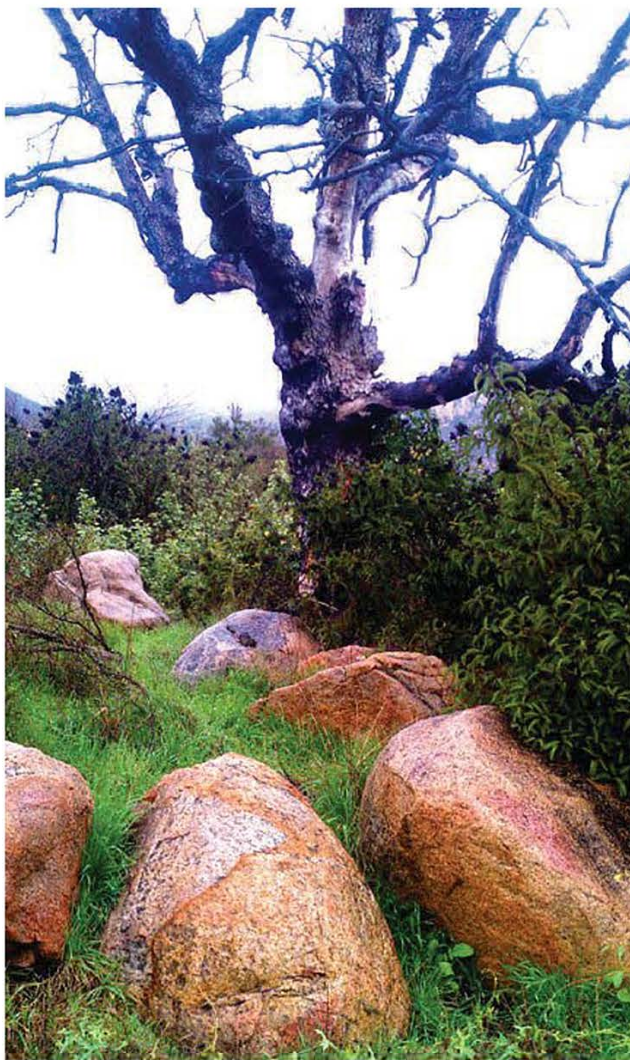
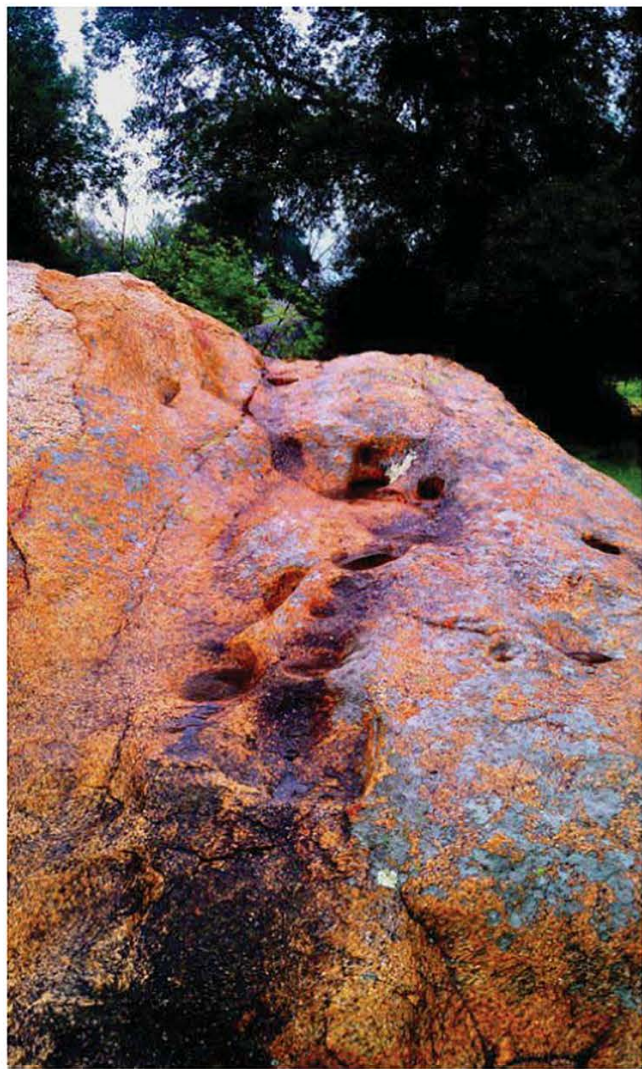
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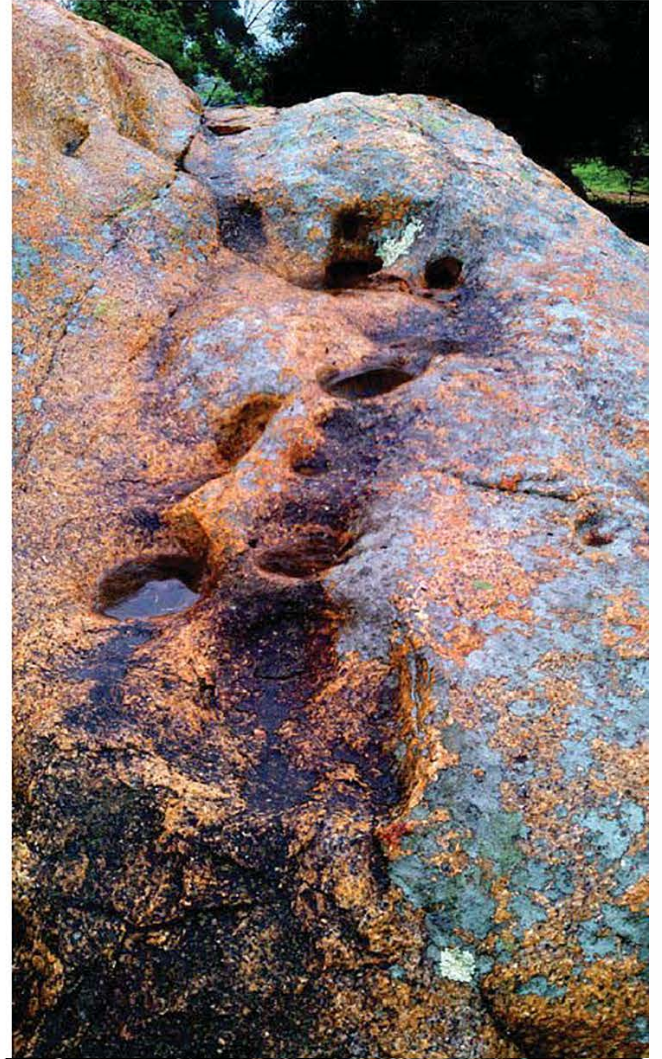
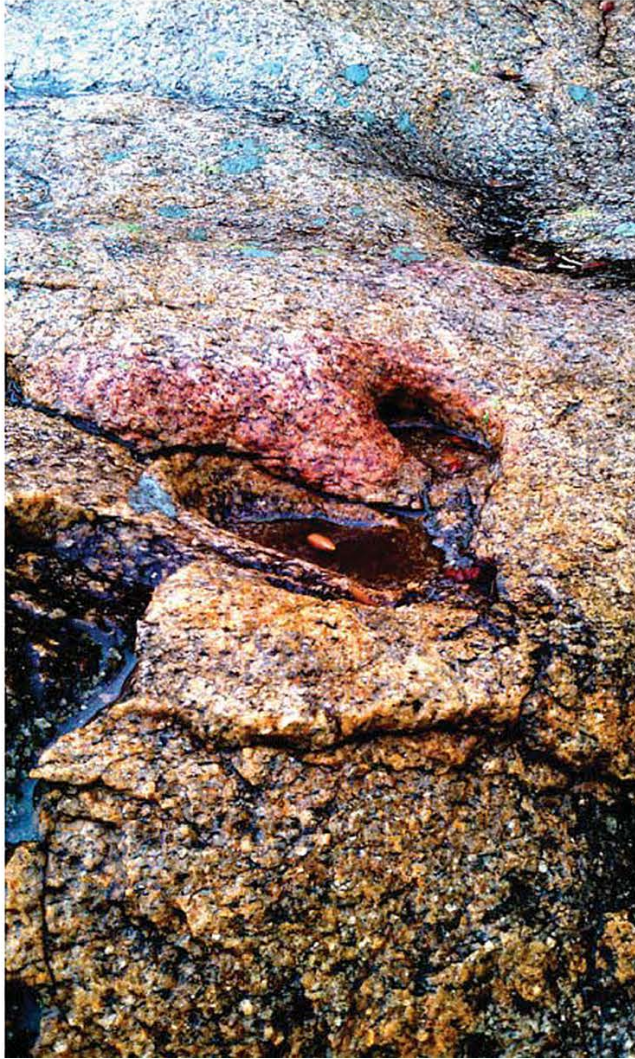
State

Zip Code









Hingtgen, Robert J

To: Bennett, Jim
Subject: RE: I oppose the strip sand mining of El Monte Valley

From: Miranda Hope [<mailto:mirandahope@yahoo.com>]

Sent: Monday, September 14, 2015 4:36 PM

To: Bennett, Jim; Horn, Bill; Roberts, Dave; diane.jacob@sdcounty.ca.gov; Cox, Greg; Roberts, Ron; Fitzpatrick, Lisa

Subject: I oppose the strip sand mining of El Monte Valley

Dear Sirs and Madams,

I am writing to express my opposition to the El Monte Valley Strip Sand Mining Project. Please support me and the entire San Diego community by objecting to, and saying "NO" to the El Monte Valley Nature Preserve LLC strip sand mining project.

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

Here are just a few of my concerns:

About 18 years or so ago, some of the same people involved with the current strip mining project came to the valley as El Capitan Golf Club LLC. They were permitted to build a golf course on the valley land owned by Helix Water District. They scraped and mounded a good portion of the riverbed leaving it devoid of vegetation and, of course, animals. They left some oak, cottonwood and sycamore trees, but a few of them have died since then from the stress of the disturbance and drought. The golf course seems to have been a ruse for sand mining because they dug huge holes, extracting and selling the sand. Law suits were filed back and forth between Helix and El Capitan Golf concerning whether or not Helix promised to provide additional water (besides the available ground water) to the golf course etc., and other complicated issues. In the end the land was left scarred and ravaged.

The sand mining company calls themselves El Monte Nature Preserve LLC. Their name sounds great, but it's a lie. They say they will "restore" the valley, but a giant pond can not replace the diverse ecosystem that naturally occurs there now. They will be strip mining for 15 years or more. Then re-seed the steep banks of the pond, create sterile 8-foot wide "trails" and call it "restored".

elmontenaturepreservellc.com

Compare to the rich biodiversity and beauty captured in photos and videos by Billy Ortiz:

<https://www.facebook.com/El-Monte-Nature-Preserve-Stop-The-Sand-Mine-In-El-Monte-Valley-1840620092830820/timeline/>

This project is short-sighted and bad not just for the human community living there, but also for the ecosystem and its water, plants, and animals. It may be good for the pockets of a few, but it's bad for San Diego County.

Sincerely,

Miranda Hope
2505 Ellentown Road
La Jolla, CA 92037

Hingtgen, Robert J

Subject: RE: El Monte Sand Mine & Nature Preserve

From: tridiggy Digenan [<mailto:tridigenan@hotmail.com>]

Sent: Monday, September 14, 2015 9:55 AM

To: Bennett, Jim

Subject: El Monte Sand Mine & Nature Preserve

My concerns for this sand mining project are as follows:

I am concerned about the impact of the disturbance of soils that are known to contain and have caused Valley Fever. Valley Fever is the most virulent fungal infection known to man. It only takes one spore to enter the body to infect a person for life. It usually causes severe pneumonia, forms nodules on the lungs but it can spread to all major organs in the body. This is called dissemination. The disseminated form can devastate the body causing skin ulcers, abscesses, bone lesions, swollen joints with severe pain, heart inflammation, urinary tract infections and inflammation of the brain lining which can lead to death. Most at risk for dissemination are Africa-Americans, Filipinos, men, those with immune system deficiencies such as organ transplants, Hodgkin's patients, pregnant women in the third trimester, cancer patients, those with HIV/AIDS and those on long term cortisone therapies.

Valley Fever is incurable and can effect anyone who breathes. It has severe lifelong health consequences for its victims and often death. Medications are expensive and can only at best bring dormancy of Valley Fever in the body. According to the CDC in a report called Emerging infectious Diseases, in California 2000-2011, 25,217 people were hospitalized with Valley Fever. The average cost of hospitalization due to valley fever was \$186 million/year, over \$2 billion over the decade, more than half of those hospitalized had to stay more than 1 week and the average cost was \$55,000 per patient.

There are 15 trillion spores that cause Valley Fever in 1 cubic inch of soil. These spores multiply exponentially as the dirt is disturbed. The proposed mining operation will cause constant soil disturbance of the soil for many years. Valley Fever cannot be mitigated by wetting wetting the soil. Actually incidences increase after wet soils dry and are disturbed called "grow and blow", referring to growth of the fungus in wet conditions. Animals also get Valley Fever. Dogs, horses, sheep, burros, coyotes, rodents and snakes can come down with Valley Fever. The El Monte Valley and surrounding areas are dense with these animal populations. An important consideration in this matter is to remember that as the air flows El Monte Valley is only 20 miles for the San Diego Coastline. Many lives could be deeply and adversely effected by this mining project. A new EIR needs to be done.

Thank You for your consideration and time in this matter

Patricia Digenan
15836 El Monte Rd
P O Box 122
Lakeside, Ca. 92040



Preserve Wild Santee

September 14, 2015

Mr. Jim Bennett
Mr. Robert Hingtgen
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
Via Email

**RE: El Monte Sand Mining And Nature Preserve EIR Scope
PDS2015-MUP-98-014W2, PD2015-RP-15-001, Log NO. PD2015-ER-98-14-016**

Dear Mr. Bennett and Mr. Hingtgen,

Preserve Wild Santee (PWS) is a long-time advocate for natural resources within the San Diego River watershed and contributed to the establishment of the San Diego River State Conservancy in 2002. PWS advocates for protection of resources that sustain people and wildlife. Please consider these comments on the Scope of the El Monte EIR.

PWS would like to see a clearly defined set of project goals that can be used to assist in the development and analysis of alternatives. Are the goals of this project primarily profit, restoration or a weighted balance between the two?

Restoration objectives should be clearly defined – especially since the dam of the river above the valley means that the river flood plain habitat will never function as it did prior to dam construction. The objectives of restoration and the means of achieving those natural functions should be carefully analyzed as the foundation for the project or any project alternative.

How rapidly can a project with the primary objective being restoration (that is clearly defined) be completed?

Since mining is intended to fund project restoration, what would a restoration only project alternative look like in terms of costs, time and impacts? What other sources exist for restoration funding?

PWS would like to see alternatives considered that reduce both the time and extent of landform disturbance, including an alternative that completely eliminates the mining component of the project.





Preserve Wild Santee

PWS would like to see alternatives considered that limit the mining component of the project to:

- 2 years or less.
- 5 years or less.

PWS hopes that clearly defined objectives, full disclosure of impacts, a reasonable range of alternatives and respect for the CEQA process will result in a positive outcome for people and wildlife in the El Monte Valley.

Thank you for considering these comments. Please place PWS on the DEIR distribution list.

Sincerely,

Van K. Collinsworth, M.A.
Resource Analyst/Executive Director



September 14, 2015



Jim Bennett
County of San Diego
Planning & Development Services

In Re: El Monte Sand Mining and Nature Preserve; PDS2015-MUP-98-014W2,
PDS2015-RP-15-001, LOG NO. PDS2015-ER-98-14-016B

Dear Mr. Bennett:

I am a resident of El Monte Valley and I am alarmed at the prospect of a sand mining operation being approved. I would like the county to address the following concerns:

1. Water- Quality and Supply

I believe the mining will impact the water supply and water quality of the valley. I would like the valley residents' wells tested on a regular basis during the sand mining operation to guarantee the water is safe to drink. I know firsthand the impact of contaminated water due to mining. I own a ranch in Kosse, Texas and the groundwater on my ranch and on the surrounding ranches contains a high level of arsenic due to contamination from nearby mining operations. Those operations were discontinued over 30 years ago, but the contaminants remained and have continued to play havoc with the water supply.

There is no financially viable option for any valley residents to connect with municipal water lines. According to the Notice of Preparation Documentation dated August 13, 2015, the project's estimated water usage will be 132 acre feet of water annually and that water would be obtained from onsite wells and ponds once the mining extends below the water table. According to my calculations, this equates to approximately 43 million gallons of water a year for the next 15-20 years. Once those onsite wells are installed, I believe the residents wells will be at a grave threat of running dry. I feel the sand mining operation should be financially responsible for providing residents water should any of our wells run dry once the sand mining wells begin operating.

2. Air Quality

Given the amount of equipment necessary to mine and transport the sand, I feel there should be continued monitoring of the air quality in the valley. The amount of diesel fumes from the 231 truckloads per day exiting the sand mine will certainly impact the air quality.

3. Valley Fever

Valley Fever spores are present in El Monte Valley and the sand mining operation increases the likelihood of those spores infecting large numbers of people, especially during Santa Ana winds. I am unsure how this threat can be mitigated but I do not relish the idea of becoming a prisoner in my own home. The county will need to address this concern. It does not matter what the odds of contracting this disease are if you are the one who is infected.

4. Wildfire Evacuation

The threat from wildfires is 365 days a year. The county will need to come up with an evacuation plan that incorporates the sand mining trucks. What will be the procedure should a wildfire break out during a weekday when the trucks are moving up and down El Monte road? There are not numerous exit options in the valley and the sand mining trucks certainly have the potential to severely impact our evacuation route.

5. Enforcement

I would like the county to consider a dedicated code enforcement officer to inspect the sand mining operation on a monthly basis to ensure the sand mining company is operating efficiently and are not cutting corners or covering up any additional pollution. This is extremely important to ensure that the equipment being used (including the transport trucks) are in good working condition and are not contaminating the ground any further with oil leaks, fuel, etc.

6. Reclamation Guarantee

I want the county to require the sand mining company to obtain a reclamation bond given by a California admitted surety company in an amount of no less than \$1,000,000.00 to ensure the mining company will complete reclamation. A surety bond is the only guarantee against the company filing bankruptcy or dissolving and disappearing leaving the valley scarred and dotted with sand pits. The bond should remain in place throughout the lifetime of this project and should only be exonerated once full reclamation has been achieved.

7. Fast Tracking

I do not believe that any part of this process should be fast tracked, nor do I think the county should rely on any past reports prepared for the golf course project as those reports are years old and this is an entirely different project.

In closing, I would like to say that despite the relative low population of El Monte valley, there are thousands of San Diego county residents who visit the valley every year for outdoor recreation including horseback riding, hiking, bicycle riding, boating and fishing at El Capitan Reservoir, camping at Lake Jennings, hang gliding, school tours of the Van Ommering Dairy (including Oma's Pumpkin Patch and the Van Ommering Christmas tree lot). These individuals will also be affected by the presence of a sand mining operation. I sincerely hope the committee members consider the impact on all of those residents of San Diego County who enjoy this beautiful valley.

Thank you for letting me express my concerns.

Rachel Holbrook

14774 Willow Road

Lakeside, CA 92040

(619) 933-2378

Hingtgen, Robert J

To: Bennett, Jim
Subject: RE: EL MONTE SAND MINING AND NATURE PRESERVE; PDS2015-MUP-98-014W2, PDS2015-RP-15-001, LOG NO. PDS2015-ER-98-14-016B

From: Renee Owens [<mailto:renee@wildlifezone.net>]

Sent: Monday, September 14, 2015 1:47 PM

To: Bennett, Jim

Subject: EL MONTE SAND MINING AND NATURE PRESERVE; PDS2015-MUP-98-014W2, PDS2015-RP-15-001, LOG NO. PDS2015-ER-98-14-016B

Dear Mr. Bennett,

Please accept the following as my official comments in response to the NOP for the El Monte Sand Mining Project referenced herein.

1. I cannot emphasize enough the need for a completely new analysis of the biological and hydrological resources that may be impacted by this project. A supplementary or subsequent EIR will not be adequate, and will not reflect the potential changes that can and do occur among habitats, sensitive species populations, and during times of drought and projected El Nino. Also, any biological or hydrological data that has been collected previously by any professional environmental associates of Michael Beck should be excluded from the analysis due to risk of biased reporting as a result of professional conflict of interest, given that Mr. Beck is part of a lawsuit on behalf of the Sand Mine client and has heavily lobbied as a proponent of the client. New surveys should not only include ESA listed species, but also other key, non-listed species present in the area, including bats and raptors.

2. The EIR must include very specific details and a specific mitigation and restoration monitoring plans regarding **exactly** how the Project plans to successfully mitigate for biological and hydrological impacts, and how restoration and reclamation will be carried out over the short and long term. For the EIR to defer to provide any such details for such in the future would be unacceptable, given the demonstrated difficulties and failures of other sand mines in the region regarding successful biological restoration/reclamation, and because reclamation of this watershed has been touted widely as a primary reason for accepting this project as environmentally viable and favorable over the long term.

3. The EIR must specifically address cumulative impacts to hydrology, including impacts to the aquifer, wells, and habitat and wildlife dependant on the aquifer maintaining a specific level.

4. The EIR should specifically address hazards associated with particulate emissions and soil disruption from a site known to contain Valley Fever, a health risk that is notorious for being under-recognized and under-reported.

5. The EIR should directly and specifically address impacts regarding contributions to greenhouses gases associated with aggregate mining and cement manufacture, including increased truck traffic.

6. The EIR should seriously consider visual and aesthetic impacts as important considerations for proposed industrial project in a Valley that is a known popular recreational destination for people who enjoy non-consumptive, scenic vista and wildlife viewing, hiking, and equestrian trails. How does the client intend to mitigate the ongoing noise and visual impacts to such, for not only nearby residents, but visitors to the area who seek peace and quiet and will be met instead with industrial sand mining construction impacts, dust, noise, and related disruption?

Thank you,

Renée Owens

Founder / Principal
Sage Wildlife LLC
Environmental Consulting since 1994

Adjunct Faculty
Imperial Valley College
renee.owens@imperial.edu

Hingtgen, Robert J

Subject: RE: PDS2015-MUP-98-014W2, PDS2015-RP-15-001

From: Robin Pawl [<mailto:robinpawl@nethere.com>]

Sent: Monday, September 14, 2015 3:25 PM

To: Robin Pawl

Cc: Bennett, Jim; Jacob, Dianne; Cox, Greg; Roberts, Dave; Roberts, Ron; Horn, Bill; Fitzpatrick, Lisa

Subject: PDS2015-MUP-98-014W2, PDS2015-RP-15-001

I am opposed to the strip sand mining of El Monte Valley

How many Red Tailed Hawks, Cooper's Hawk, Red Shouldered Hawks live, hunt, nest in El Monte Valley? How will they be "restored"?

How many Crows and Ravens live, forage and nest in El Monte Valley? How will they be "restored"?

Robin Pawl 14512 Willow Road, Lakeside, CA 92040

Hingtgen, Robert J

Subject: RE: comments on strip sand mining of El Monte Valley

From: Robin Pawl [<mailto:robinpawl@nethere.com>]

Sent: Monday, September 14, 2015 3:17 PM

To: Robin Pawl

Cc: Bennett, Jim; Jacob, Dianne; Cox, Greg; Roberts, Dave; Roberts, Ron; Horn, Bill; Fitzpatrick, Lisa

Subject: comments on strip sand mining of El Monte Valley

I am opposed to the strip sand mining project in El Monte Valley.

How many bee hives are in El Monte Valley? How will they be safely removed? Relocated to where?

Will fish be put in the pond? What kind? People will plant game fish so they can come back to catch them. What measures will be taken to safeguard people fishing on the steep banks of the pond?

Will fish or another form of mosquito control be used in temporary ponds, puddles, standing water? If other forms of mosquito control are used, will they be safe for the aquifer and well water?

The Recon map showing the vegetation and land cover is inaccurate. The locations of oak and sycamore trees are not indicated even though the trees can be seen beneath the over lying colors. What other portions of the map are inaccurate? <http://www.elmontenaturepreservellc.com/project-description-2/>

Students from El Capitan High School run on Willow Road and El Monte Road as practice and conditioning for track and field, cross country, etc. What measures can be taken to safeguard them from the increased traffic, noise, dust, and other hazards the sand mining will create?

Helix Water District's barbed wire fence is on our property. Will a new survey be taken to ensure all measurements are made from the correct line? Not from the fence.

How many long nosed snakes, thread snakes, ring neck snakes were found in the wild life surveys conducted? How many of the more commonly seen snake species were found? (rattle, garter, gopher, king, rosy boa, rubber boa,) How will these snakes be re-located? How will this part of the biodiversity be "restored"?

How many species of lizard were found? How will they be relocated or "restored"?

How many species of ants, wasps and bees live in the area of concern? How will they be "restored" or relocated?

Robin Pawl 14512 Willow Road, Lakeside, CA 92040

Hingtgen, Robert J

Subject: RE: comments on El Monte Valley strip sand mining

From: Robin Pawl [<mailto:robinpawl@nethere.com>]

Sent: Monday, September 14, 2015 1:50 PM

To: Robin Pawl

Cc: Bennett, Jim; Jacob, Dianne; Cox, Greg; Roberts, Dave; Roberts, Ron; Horn, Bill; Fitzpatrick, Lisa

Subject: comments on El Monte Valley strip sand mining

I am opposed to the Proposed strip sand mining project in the El Monte Valley.

Planning and Development Services Reference: PDS2015-MUP-98-014W2, PDS2015-RP-15-001, LOG NO. PDS2015-ER-98-14-016B

I live at 14512 Willow Road, Lakeside, CA 92040. That is also the home of my business The Magic Horse Therapeutic Riding Center. I teach children and adults with disabilities how to work with, care for, and ride horses (along with social skills, communication, life skills and more). Their ages range from 3 to 69.

The pond edge will be about 150 feet from our arena where our riding lessons are held. I will not be able to conduct lessons with heavy equipment digging so close to my horses and students. It will be an unsafe situation. Not only will it be frightening and distracting for the horses, but for my students and volunteers as well.

I have been told the access road for the project will be 10 feet below ground level so the trucks will not be seen or heard. I don't believe that will actually work.

What other solutions will there be to prevent hearing and seeing the heavy equipment as the pond area is being excavated?

The reason our land was purchased was to have a quiet, peaceful atmosphere in which to conduct my business. What measures can the sand miners take to keep the environment quiet and peaceful? How long will they be digging in front of our property? Besides spraying water, how will the minimize dust?

Robin Pawl
(619) 672-6935

The Magic Horse
Therapeutic Riding Center
A 501(c)3 Public Charity

Our mission is to make a life-enhancing difference for people with disabilities and their families through the magic and power of the horse.

Hingtgen, Robert J

To: Bennett, Jim
Subject: RE: comments on satrap sand mine in El Monte Valley

From: Robin Pawl [<mailto:robinpawl@nethere.com>]

Sent: Monday, September 14, 2015 2:23 PM

To: Robin Pawl

Cc: Bennett, Jim; Jacob, Dianne; Cox, Greg; Roberts, Dave; Roberts, Ron; Horn, Bill; Fitzpatrick, Lisa

Subject: comments on satrap sand mine in El Monte Valley

https://en.wikipedia.org/wiki/Migratory_Bird_Treaty_Act_of_1918

The Migratory Bird Treaty Act of 1918 Protects birds and "Some of these conventions stipulate protections not only for the birds themselves, but also for habitats and environs necessary for the birds' survival.

Constitutionally this law is of interest as it is a use of the federal treaty-making power to override the provisions of state law. The principle that the federal government may do this was upheld in the case *Missouri v. Holland*."

"**Migratory birds** may seek respite within trees or on buildings considered **private property**.

The **Migratory Bird Treaty Act of 1918** prohibits the removal of all listed species or their parts (feathers, eggs, nests, etc.) from such property. However, in extreme circumstances, a federal permit might be obtained for the relocation of listed species (in some states a state permit is required *in addition* to a federal permit). Pursuant to the spirit of the treaty, it is not trivial to obtain a permit; the applicant must meet a certain criteria as outlined in Title 50, **Code of Federal Regulations**, 21.27, Special Purpose Permits.^[6]

The permit applicant is generally a contractor who specializes in wildlife relocation. When hiring a contractor to trap and relocate any animal from one's property, the private property owner is well advised to attain proof of such permits before any trapping activity begins, as trapping without the necessary paperwork is common in the United States.

Most wildlife management professionals consider relocation actions undue harm to the birds, particularly since relocated birds (being migratory) often return to the same property the next year. In the case of trapping and relocation, *harm* is brought on by or can result in:

- *Breaking*, a term describing increased susceptibility to disease brought on by the stress of capture and relocation
- Difficulty in establishing territory at the new location
- Separation of family members and the stunting of juveniles' natural progression into adulthood"

The following link provides a list of the birds protected by the Migratory Bird Treaty Act of 1918:

<http://www.fws.gov/migratorybirds/regulationspolicies/mbta/MBTANDX.HTML>

Many of these birds live in El Monte Valley. I have seen them myself.

How can the strip mine operate without damaging the environs and habitats of the birds on this list that live in El Monte Valley?

I oppose the strip sand mining project proposed for El Monte Valle

Robin Pawl

14512 Willow Road, Lakeside, CA 92040

Hingtgen, Robert J

Subject: RE: comments for El Monte Valley Sand mining

From: Robin Pawl [<mailto:robinpawl@nethere.com>]

Sent: Monday, September 14, 2015 12:28 PM

To: Bennett, Jim

Cc: Jacob, Dianne; Cox, Greg; Roberts, Dave; Roberts, Ron; Horn, Bill; Fitzpatrick, Lisa

Subject: comments for El Monte Valley Sand mining

I am opposed to the El Monte Valley strip sand mining project. The biodiversity would be destroyed along with the lives of many organisms. Below is a partial list of just birds that live in the El Monte Valley. They are protected under the Migratory Bird Treaty Act of 1918. I personally have seen all of these species of birds in the valley. None of them can live in a pond.

Migratory birds tend to return to their known sites. Destruction of the habitats they need threatens their survival. How can birds from a large area be forced into a smaller area? Competition for food and resources will be too steep for them all to survive.

How will the sand mining effect these birds?

Some are seasonal residents. Surveys of their presence and numbers must be made at the appropriate time of year to get an accurate measure.

How can the project proceed when the habitats of these birds are protected by the Migratory Bird Treaty Act of 1918?

Migratory birds may seek respite within trees or on buildings considered private property.

The **Migratory Bird Treaty Act of 1918** prohibits the removal of all listed species or their parts (feathers, eggs, nests, etc.) from such property. However, in extreme circumstances, a federal permit might be obtained for the relocation of listed species (in some states a state permit is required *in addition* to a federal permit). Pursuant to the spirit of the treaty, it is not trivial to obtain a permit; the applicant must meet a certain criteria as outlined in Title 50, Code of Federal Regulations, 21.27, Special Purpose Permits.^[8]

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- *Breaking*, a term describing increased susceptibility to disease brought on by the stress of capture and relocation

- Difficulty in establishing territory at the new location
- Separation of family members and the stunting of juveniles' natural progression into adulthood
-

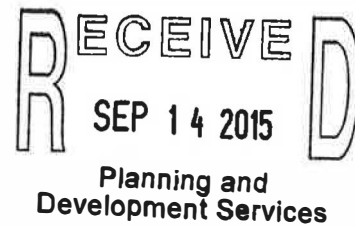
https://en.wikipedia.org/wiki/Migratory_Bird_Treaty_Act_of_1918

A partial list of birds protected under the Migratory Bird Treaty Act that live in El Monte Valley:

Western Bluebird, *Sialia mexicana*
 White-breasted Nuthatch, *Sitta carolinensis*
 CROW, American, *Corvus*
 Mourning Dove, *Zenaida macroura*
 Great Egret, *Ardea alba*
 House Finch, *Carpodacus mexicanus*
 Northern Flicker, *Colaptes auratus*
 Lesser Goldfinch, *Spinus psaltria*
 Great-tailed Grackle, *Quiscalus mexicanus*
 GROSBEAK, Black-headed, *Pheucticus melanocephalus*
 Cooper's Hawk, *Accipiter cooperii*
 Red-shouldered Hawk, *Buteo lineatus*
 Red-tailed Hawk, *Buteo jamaicensis*
 Anna's Hummingbird, *Calypte anna*
 Costa's Hummingbird, *Calypte costae*
 Ruby-throated Hummingbird, *Archilochus colubris*
 Rufous Hummingbird, *Selasphorus rufus*
 KESTREL, American, *Falco sparverius*
 KILLDEER, *Charadrius vociferus*
 Western Kingbird, *Tyrannus verticalis*
 White-tailed Kite, *Elanus leucurus*
 Western Meadowlark, *Sturnella neglecta*
 Northern Mockingbird, *Mimus polyglots*
 White-breasted Nuthatch, *Sitta carolinensis*
 Bullock's Oriole, *Icterus bullockii*
 Hooded Oriole, *Icterus cucullatus*
 OWL, Barn, *Tyto alba*
 etc., etc.....

Robin Pawl 14512 Willow Road, Lakeside, CA 92040

September 12, 2015



Mr. Darin Neufeld, AICP

Planning Manager

5510 Overland Avenue

Suite 310

San Diego, CA 92123

RE: El Monte Sand Mine & Nature Preserve

Dear Mr. Neufeld:

I would like to express concerns over many aspects of this project. As a small ranch owner and in El Monte Valley and Physician Assistant in Urgent Care, this will have a big impact on my quality of life and may well cause me to have to give up my ranch.

I. SAVE OUR WATER

The El Monte Valley is the third largest aquifer in San Diego County. The sand there provides a natural filter to keep the water clean and uncontaminated. The residents of the valley are all on wells and there is no infrastructure in place to provide water to us, so if this project goes through and the well water is gone or contaminated we essentially will have to move away and take the loss as the properties will not be usable. The Helix Water District did have a project going several years ago to use the sand in the valley to filter water from another source with wells but gave up this project due to costs. With the sand mining project digging to a depth of 100 feet over 265 acres this large aquifer will no longer be accessible for use after mining begins. Millions of gallons of usable water will be spent for their mining work and more lost in evaporation with the large open gash created in the aquifer itself.

Contamination of the aquifer with diesel spills and soil organisms and nitrogen oxides/nitrates is an environmental concern and could very well make the water downstream and even some ways upstream unusable. As far as I know the water rights to this aquifer may not even belong to the Helix Water District but rather to San Diego City or County. What gives this El Monte San Mine water rights to this valley? The wildlife in the valley and migrant wildlife will be affected by loss of their habitat and food. It will also cause permanent loss of agriculture potential in this valley. I cannot see how people with a conscience and morals can approve this waste of water in a drought in San Diego. You cannot drink sand and can live very well without it.

After the mining is done in 15 or 30 years (that part is up in the air), the large area of stagnant water left by this project offers the opportunity for increased water contamination when we do receive our occasional big rains in the winter with a good chance of significant flooding and washing away of large quantities of soil.

II. PUBLIC HEALTH CONCERNS

- 1) Coccidioiodomycosis or Valley Fever is a big concern during the sand mining and transport of this soil for visitors and residents in and around the El Monte Valley. These fungal spores are known to be in the area. One of the dogs belonging to one of our customers at the ranch developed a lung infection from this. Our customer spent a lot of money treating her dog for this and he was seriously ill. Other people in the valley have claimed to have been treated for this infection. The mining project will stir up a lot of dust with the spores being able to travel for miles on the winds. There are many school children who come to visit the Van Ommering Dairy in this valley as well as Oma's Pumpkin Patch as well as all the visitors who come to climb and hike or enjoy El Monte Park.
- 2) West Nile Virus is still a public health concern all over the country and is transmitted by mosquitoes. With the large body of standing water created by this project how many birds, animals and humans will be impacted by this infection?
- 3) Poor Air Quality is a concern. Fumes and increased particulate matter from this project and increased traffic may affect certainly those with lung problems like asthma, emphysema, COPD, silicosis or asbestosis. Evidently there are greenhouse gases associated with aggregate mining and cement manufacture. Diesel emission of nitrogen oxide combining with hydrocarbon emissions in the sunlight create ground level ozone. Is silicosis a concern with the sand in the air?

III PROTECT SCENIC EL MONTE VALLEY

El Monte Valley Road and Willow Road are designated "scenic corridors" and will certainly no longer be scenic with a large sand mining operation which is ugly in the extreme in anyone's view except for those making money from it. El Monte Valley is currently a popular recreation destination with the lake at the east end of the valley, beautiful El Capital peak to hike to, and El Monte Park. The increase in noise, traffic and air quality will all add to detract from any visitor's experience here. This project will disrupt the wildlife corridor through this valley. There are native American artifacts known to be in El Monte Valley and these could be irreparably damaged and lost.

The El Monte Valley is home to a lot of wildlife. I had the incredible honor of seeing a golden eagle about 0.25 miles from my ranch perched beside the road about 5 years ago. Other raptors are frequently seen like the red tailed hawk, Cooper's hawk, falcons, Great Horned Owls, and barn owls. I am not a naturalist but the area needs to be looked at as far as it providing habitat for endangered reptiles, birds, and insects. I am an amateur bird watcher and have noted a wide variety of birds which come and go in the valley.

Please save this beautiful El Monte Valley and consider all the grave consequences of allowing this El Monte Sand Mine to cause so much damage. There will be no "nature preserve". The pattern of these companies is to stop their operation and claim they are not through mining or some other excuse and no restoration ever occurs. I would love to hear of one that came through with a valuable restoration at the end of their project.

Respectfully yours,

Robyn Bodecker, PA-C

Mailing address: 4263 Mt. Putman Avenue, San Diego, CA 92117

My ranch: 14660 El Monte Road, Lakeside, CA 92040

Phone 619-884-9197

E-Mail rbodecker@san.rr.com

**EL MONTE SAND MINE & NATURE PRESERVE
PDS2015-MUP-98-014W2, PDS2015-RP-15-001**

**NOTICE OF PREPARATION (nop) OF ENVIRONMENTAL IMPACT REPORT
PUBLIC REVIEW PERIOD
August 13, 2015 through September 14, 2015**

PUBLIC SCOPING MEETING COMMENT SHEET

**NOP Scoping Meeting August 26, 2015
Lakeside Community Center
9841 Vine Street
Lakeside, California 92040**

I am writing to you to voice my concerns of the harm a sand mine operation in El Monte Valley will cause to the people, animals and the entire area of Lakeside and surrounding areas. I request that you investigate and address my concerns in the environmental impact report.

I am requesting that a new EIR be completed for this project. I believe the County has made a mistake by requiring a SEIR, because the EIR for the golf course was completed 15 years ago. A lot has changed since then.

I have lived in the El Monte Valley for three years. My husband has lived here for almost 40 years. He built his home located on Willow Rd. We have a well which supplies our drinking and irrigation water as do all the residents in the valley. My fear is that the digging in the valley floor will contaminate our wells leaving them useless. Where will we obtain our drinking and irrigation water? Who will pay for it? We have a drought situation currently. The sand mining operation will require the use of 1.5 million tons of water per year. How does this make any sense when all residents are required to cut back our usage of water?

Standing water also attracts mosquitoes that carry West Nile Virus. People have died this year from West Nile Virus. Warm water breeds the ameba (Naegleria fowleri). This ameba living in warm fresh water migrates up the nose and causes (PAM) a type of meningitis which is almost universally a fatal disease. PLEASE INVESTIGATE AND ADDRESS IN THE EIR.

El Monte Valley has been identified as a Valley Fever area. The mining of the sand will send valley fever spores into the atmosphere, which will be carried by the wind to the surrounding areas. There are several schools not far from the valley, including El Capitan High School and at least two grade schools. The wind could carry the spores into other neighboring towns and possibly to the coast. PLEASE INVESTIGATE VALLEY FEVER AS THERE IS NO CURE FOR IT.

My concern is also for the endangered animals and non-endangered animals, flowers, trees and grasses that thrive in the valley. Where will they go? How do we care for them? Air quality, noise and pollution are other issues that need to be addressed in the EIR.

Another concern is the amount of traffic that will be caused by several large trucks driving on El Monte Valley road a two lane road with only one way out. What if there is a major fire in the valley area? The traffic will impact the current residents living off the road. The streets of Lakeside will become more crowded and the intersections more dangerous. Who will make the necessary repairs to the road and to the streets of Lakeside after the heavy trucks have torn them up?

The area should be preserved and made into a recreational area for all San Diegans to enjoy hiking, horse back riding, biking and walking on trails around the valley.

Thank you for your consideration of my concerns.

Rosemary Sloan
14316 Willow Rd.
Lakeside, CA 92040

September 14, 2015

619-561-4593

From: [Shelley Gress](#)
To: [Hingtgen, Robert J](#)
Cc: [Shelley Gress](#)
Subject: PDS2015-MUP-98-014W2 & PDS2015-RP-15-001
Date: Monday, September 14, 2015 11:35:42 AM

Dear Mr. Hingtgen:

Thank you for the opportunity to comment on the scope of the EIR for the above referenced project. I have boarded horses and continue to do so in the El Monte Valley since 1998. I have enjoyed the beauty and tranquility of the valley for over 16 years. I am very aware that this project may have many environmental impacts. During the preparation of the EIR, please make sure to fully address:

- Visual impacts to a scenic valley that is a popular recreational destination.
- The impact of permanent loss of agricultural potential of this rich alluvial Valley.
- Greenhouses gases associated with aggregate mining and cement manufacture.
- Issues associated with interruption of an important wildlife corridor.
- Hazards associated with particulate emissions from a site known to contain Valley Fever, and also hazardous to wildlife, domestic stock, bird life and humans associated with West Nile Virus.
- Impacts to the variety of native plants and animals some which are listed as endangered.
- Impacts to soil organisms.
- Impacts to the aquifer, wells, and habitat and wildlife dependent on the aquifer.
 - Hazardous road conditions with the exponential growth in traffic on our public road systems
 - Impacts to fire evacuation and safety to the residents that live in the El Monte Valley area as there is essentially "one way in and one way out".
 - Impacts to the environment regarding fuel storage for the Sand Mining project.

Sincerely,

Shelley M. Gress (Electronic Signature)

Shelley M. Gress

1679 Naranca Avenue El Cajon, CA 92019

858-531-7173 (Cell)

shelleygress@gmail.com

Hingtgen, Robert J

Subject: RE: El Monte Valley Strip Sand Mining Project

From: Stephanie Russell [<mailto:srussell621@gmail.com>]

Sent: Monday, September 14, 2015 12:25 PM

To: Bennett, Jim; Horn, Bill; Roberts, Dave; Roberts, Ron; Cox, Greg; Fitzpatrick, Lisa; diane.jacob@sdcounty.ca.gov

Subject: El Monte Valley Strip Sand Mining Project

Hi,

I am writing regarding the following reference:

Planning and Development Services Reference: PDS2015-MUP-98-014W2, PDS2015-RP-15-001, LOG NO. PDS2015-ER-98-14-016B

I would like to officially express my opposition to the El Monte Valley Strip Sand Mining Project. The inevitable biological and environmental destruction associated with this initiative far outweighs simple dollar signs. Further, not only from a community standpoint, but from a state standpoint this project is not in line with any drought-conservation efforts. Where will we be pulling water from to support the excavation process, and then to fill the lake? This project cannot be supported given the severe drought that plagues the state of California.

Please support me and the entire San Diego community by objecting to, and saying "NO" to the El Monte Valley Nature Preserve LLC strip sand mining project.

Best Regards,

Stephanie Russell

4630 1/2 North Ave San Diego, CA 92116

Date 9-10-15

Reference:

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

Attention Jim Bennett

5510 Overland Avenue, Suite 310

San Diego, CA 92123



Dear Mr Bennett,

I am writing to offer my thoughts and ideas about the scope and nature of the environmental impacts that can and will be caused by the El Monte Valley Sand Mining Project. I ask that these concerns be thoroughly considered in the preparation of the Environmental Impact Statement.

This project will negatively impact:

the health of the people of Lakeside

Truck on the road a small 2 lane
which is all ready crowded with people
going to the farm pumpkin-patch, Lake
& El Monte Park, heads home over
the water with the load.

I am 82 years old & will only both
me for a short few years, I have no means
to move.

thanks you

Vernice Best

13049 LINDO LN.

LAKE SIDE CA. 92040

Sincerely,

Vernice Best

Signature

Print Name

13049 LINDO LN. LAKE SIDE

Address

City

Phone: 619-443-7784 Email: NONE☐ Please check if you comments extend to the back side of the page.

Planning and Development Services

Date 9/10/15

Reference:

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

Attention Jim Bennett

5510 Overland Avenue, Suite 310

San Diego, CA 92123

RECEIVED
SEP 14 2015

Dear Mr Bennett,

I am writing to offer my thoughts and ideas about the scope and nature of the ^{Planning and Development Services} environmental impacts that can and will be caused by the El Monte Valley Sand Mining Project. I ask that these concerns be thoroughly considered in the preparation of the Environmental Impact Statement.

This project will negatively impact:

The Amount of Fuel would be a large figure, so which ~~Fuel~~ Diesel Fuel company would be involved with them. Would they build and supply a new station.

Would there be a direct road or pipeline to the refuel station.

Would it be red fuel or open to the public. Also would they be building a road down the riverbed to the existing trucking companies along the river in lakeside.

What type of fill will the trucks be bringing back, to make the return trip. Who will check the fill debris - dirt, cements, rock brush or whatever, they're not gonna drive back empty.

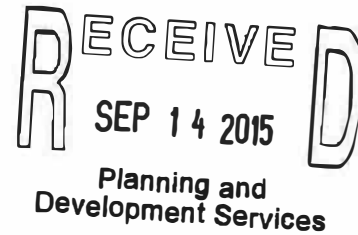
Sincerely,

Wayne Lawler Wayne Lawler 8545 Zeigler Ln Lakeside CA 92040
Signature Print Name Address City

Phone: 619-944-2131 Email: WayneLawler62@yahoo

☐ Please check if you comments extend to the back side of the page.

Mr. William Beard
& Mr.s DiPirro-Beard
5870 Macargo Street
Granite Bay, Ca 95746



September 10, 2015

Planning and Development Services□
Reference PDS2015-MUP-98-014W2,
PDS2015-RP-15-001 Log No. PDS2015-ER-98-14016B
Attention Jim Bennett□
5510 Overland Avenue, Ste. 310□
San Diego, CA 92123

Dear Mr. Bennett,

I'm writing to share my concerns opposing Sand Strip Mining in El Monte Valley.

I have been to the El Monte Valley area many times: it is a rural area with charm no longer found in much of San Diego. It should stay as beautiful as it is now.

Allowing Sand Strip Mining will destroy the rural nature of the area and have a significant environment impact. It will require upgrading the roads to withstand the heavier and increased traffic. It will require noise and air abatement actions. It may require compensation for diminished property values. Make no mistake; a strip mine operation will destroy the natural beauty of the area. Constant drilling and trucks hauling for long hours of the day, most days of the week, year round will ruin the tranquility of the valley. With the industrialization of the valley comes noise and air quality loss, changing the fundamental nature of the area. No longer will the valley be a sanctuary from the city but a place of the early 1900s' with all the negative images of industrialization and realities associated in a time best left behind.

Chickens wander the roads, peacocks cry into the days, children grow in a world rapidly disappearing. In short, El Monte Valley is a place to preserve, not destroy.

Please, let the voices of the people imploring you to protect the beauty and splendor of the El Monte Valley outweigh the voices of strip mining group.

Thanks for your time.

Sincerely, □

William Beard & Sharon DiPirro-Beard

Hingtgen, Robert J

To: Hingtgen, Robert J
Subject: RE: scoping/CEQA/ EIR El Monte Sand Mine

From: zack noonan [<mailto:zvnoonan@yahoo.com>]

Sent: Monday, September 14, 2015 2:20 PM

To: Bennett, Jim

Subject: scoping/CEQA/ EIR

Planning and Development Services

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

5510 Overland Avenue, Suite 310

San Diego, CA 92123

Dear Mr. Bennett.

It has come the time for me to voice my concerns as to what i would like for your staff to consider while processing the content of the E.I.R.

- 1.) 1st. and foremost the damage to the aquifer needs paramount considerations, The aquifer in EMV. supplies my well with its water. i have concerns of contamination do to discharge of contaminated mining water, as well, the water flow at my well is 100GPM i have concerns of my water flow being downgraded. I would like to request that the county of San Diego use my well as one of the locations that will be tested and analyzed for establishing a baseline of water quality and water flow rate. I have no desire to be supplied city water.
- 2.) The quality of air particulates needs to be high on the list of concerns, the heavy equipment and heavy truck traffic will cause an unhealthy high number of particulates to be distributed into the air we as a community breath. the two ways i understand to suppress the dust from this type of activity would be to apply large amounts of water or to apply a chemical suppressant. we are in a statewide drought and cant afford to use water for such usage. if they apply chemicals wont some of those chemicals get back into the aquifer causing contamination?
- 3.) The potential for valley fever exposure is high on my list of concerns
- 4.) the potential for breeding grounds being established for mosquitoes that have the potential health risk of spreading West Nile Virus, and or Dengue Fever.. this same warm water is a breeding ground for the Ameba Naegleria Fowleri, which causes a meningitis that is commonly fatal.
- 5.)The traffic impacting a small rural community that is surrounded by small 2 lane roadways poses a potential for many unnecessary road hazards/accidents to not only people/bicyclist/ but the local populations of the many small animals living in the EMV.
- 6.) EMV is currently designated as a scenic corridor. the proposed project will surly adversely effect the beauty of EMV for generations to come.
- 7.) The obvious noise pollution for that will be generated by such a large scale operation for decades to come will adversely cause damage to both human and animal wildlife that currently enjoy a peaceful and quiet lifestyle.
- 8.) All of the habitat and lives of ALL ENDANGERED SPECIES needs to be high on the list of EIR concerns. we as a community request your staff to include this loss of life to endangered species as a top priority.

I respectfully request your staff to include but not limit your drafting of the EIR for El Monte Valley in Lakeside to my above listed concerns. electronically signed... Z.V.Noonan Dated Sept.14th 2015 2:19 pm

ZACK V. NOONAN
14755 EL MONTE RD.
LAKESIDE CA. 92040
619-278-1885
zvnoonan@yahoo.com

Hingtgen, Robert J

To: Bennett, Jim
Subject: RE: Sand mining-El Monte Valley

From: Marie Culver [<mailto:marieculver12@yahoo.com>]
Sent: Tuesday, September 15, 2015 2:57 PM
To: Bennett, Jim
Subject: Sand mining-El Monte Valley

Mrs. Marie Culver
6914 Ballinger Ave.
San Diego, Ca 92119

Dear Mr. Bennett,

I am writing to you to express my concerns about the proposed strip sand mining by El Monte Valley Preserve LLC. I do not believe this 'company' has the best interests in mind for the residents and people who enjoy one of the last virgin river valleys that is easily accessible. They only have their own interests in mind: \$\$\$\$, lots of \$\$\$\$. Some of them have already shown their disregard for this valley by illegally removing sand under a proposed golf course. The title of this company is deceitful. They say they will restore and improve this valley, but many of us don't believe due to past experiences with sites like this.

I board my horse at one of the boarding ranches at the east end of the valley. I ride in the river valley many days a month and observe the rich wildlife that lives there. It is a taste of the wild that has many trails to delight the nature lover. Once this area is destroyed, it will never be the same. You can find two giant holes that the last sand removal left. They can't be seen from the roads, but mar the beauty of the grassland area. If this goes as planned, I have the option to move my horse to a new location, but I picked this area because of its natural habitat and views of the surrounding mountains.

I can move, but the residents can't. What happens to their pristine wells? They will not be able to sell their property. Who would buy land near all this destruction and noise? Would the proponents live here? I think not!!! They just want to have more money to buy more houses, more cars, more whatever at the expense of the residents who want to keep life in this rural environment. **Would you buy land and live there, putting up with the noise, dust, and other annoying and dangerous elements? I think not!!!**

There are many reasons for this project to be denied: Valley Fever, the water issue, and many more too numerous to list here. The residents, both human and animal, deserve to have the quality of life kept the same, not destroyed. I teach environmental studies at the elementary grade level. ***What kind of legacy will you leave for the children and residents of this area?***

Please, please, please help us keep the valley GREEN, not change it to the color of GREED!

Most Sincerely Yours,
Marie Culver

Hingtgen, Robert J

Subject: RE: strip sand mining El Monte Valley

From: Bob Decker [<mailto:bvddecker@gmail.com>]

Sent: Tuesday, September 15, 2015 10:12 AM

To: Bennett, Jim; bill.hom@sdcounty.ca.gov; Roberts, Dave; diane.jacob@sdcounty.ca.gov; Cox, Greg; Roberts, Ron; Fitzpatrick, Lisa

Subject: strip sand mining El Monte Valley

Undoubtedly you have heard of the proposed project. I have to ask this question; does everything have to be money? Do we have to sell our soul for a few coins? Please leave the land as it is.

I could go on for many paragraphs but I choose not use up your time. I ask that you just ask yourself this question; Will San Diego County be better off in fifteen years if the project goes through or if we leave the land as it is. You make the choice.

Robert Decker
Spring Valley, Ca.

Reference:

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

Attention Jim Bennett

5510 Overland Avenue, Suite 310

San Diego, CA 92123

Dear Mr Bennett,

In a life long resident of Lakeside 77 yrs old. So El Monte Valley has always been important to me
I am writing to offer my thoughts and ideas about the scope and nature of the environmental impacts that can and will be caused by the El Monte Valley Sand Mining Project. I ask that these concerns be thoroughly considered in the preparation of the Environmental Impact Statement.

This project will negatively impact:

Many years ago my Dad who loved digging for Indian artifacts on the river came down with Valley Fever. When the digging begins the County and Sand Company will be responsible for what its going to bring. This is a wonderful part of our County there is much so much history here and know one cares. When this desecration ends, water sources will be effected. Wildlife species go away. What ever happened to: we must save the environment! save the eagles! dont pollute!

The disrespect that has been shown to the Lakeside Community is appalling. You work for us, remember! Morona Valley a mess Powerlink towers strung across El Monte.

Sincerely,

Russ Landsdowne **DIXIE LANDSDOWNE** **LAKE SID** **92040**
Signature Print Name Address City

Phone: 619 443-2817 Email: _____☐ Please check if you comments extend to the back side of the page.

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SEP 17 2015

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EL MONTE SAND MINE & NATURE PRESERVE
PDS2015-MUP-08-014W2, PDS2015-RP-15-001
NOTICE OF PREPARATION (NOP) OF ENVIRONMENTAL IMPACT REPORT
PUBLIC REVIEW PERIOD
August 13, 2015 through September 14, 2015
PUBLIC SCOPING MEETING COMMENT SHEET
NOP Scoping Meeting August 26, 2015
Lakeside Community Center
6641 Vista Street
Lakeside, California 92040

WRITTEN COMMENT FORM

I care about
El Monte Valley

(Attach additional pages as needed)

MAIL or E-MAIL COMMENTS TO:

Jim Bennett
County of San Diego
Planning & Development Services
5510 Overland Ave., Suite 310
San Diego, CA 92123
Phone: (619) 594-3820
e-mail: jim.bennett@sdcounty.ca.gov

COMMENTS MUST BE RECEIVED BY 4:00 PM, SEPTEMBER 14, 2015

Jane Van Tegen
JANE VAN TEGEN
15420 Old Hwy 80 148
Oceon CA. 92021



Cathy Nelson
Yesterday

If you care about El Monte Valley then please print this fill it out and mail it to the address listed. Thank you.

Like · Comment · Share

Daniel Johnson and Kelli Armitage like this.

1 share



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