County of San Diego

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PLANNING & DEVELOPMENT SERVICES
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DARREN GRETLER
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PHONE (858) 694-2962
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May 6, 2016

Mr. Bill Adams
El Monte Nature Preserve, LLC
1335 San Lucas Court
Solana Beach, CA 92075

PROJECT NAME: EL MONTE SAND MINING AND NATURE PRESERVE
RECORD ID: PDS2015-MUP-98-014W2, PDS2015-RP-15-001
ENVIRONMENTAL LOG NO.: PDS2015-ER-98-14-016B
PROJECT ADDRESS: El Monte Road, Lakeside, CA 92040; **APN:** 390-040-51; portion 391-061-01; 391-071-04; 392-050-47; 392-060-29; 392-130-42; 392-150-17; 393-011-01;
TRUST T NO.: 2032783-D-03380

RE: FIRST ITERATION REVIEW OF INITIAL STUDIES/INFORMATION

Dear Mr. Adams:

Planning & Development Services (PDS) has completed the review of the documents submitted on March 14, 2016. The Climate Change Analysis, Cultural Resources Report, Groundwater Study, SWPPP and Visual Impact Analysis have not been submitted for PDS review. The review of the Cultural Testing Plan and Land Development review of the Plot Plan, Reclamation Plan, Drainage Study and Sight Distance Study are still pending.

An update to the Project Issue Checklist detailing additional information or revisions that are required to make the document adequate and ready for either public review or hearing is included as an Attachment A. **This Checklist will be used to document all project issues that must be resolved, and revisions that must be completed, prior to public review under the California Environmental Quality Act (CEQA), or decision if no circulation of environmental documentation is required pursuant to CEQA.** In response to the Project Issues Checklist, the applicant is expected to include a letter with every submittal made to the Department stating how each item number in the Checklist has been addressed.

ESTIMATE OF DISCRETIONARY PROCESSING COSTS: Your discretionary processing cost estimate dated March 11, 2016 was $339,847. To date, you have deposited $140,000. As of May 6, 2016, the account balance is $9,072.38. We estimate the need for an **additional deposit of $45,000** to continue processing the application after submittal of the items requested in this letter. It should be noted that a revised Form PDS-346 is needed to update

the project contact information. This form must be signed by the applicant and is required prior to submittal of the requested documents. The counter staff will not accept the documents without the signed 346 form.

The estimate includes only the costs to get your present application(s) to hearing/ decision. Should your application be approved, there will be additional processing costs in the future (e.g., Final Map processing costs, park fees, drainage fees, building permit fees). To obtain an estimate of future building permit and plan check fees, parks fees, and Traffic Impact Fees, see http://www.sdcounty.ca.gov/PDS/bldgforms/index.html#fees.

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

SUBMITTAL REQUIREMENTS

Unless other agreements have been made with County staff, you must submit all of the following items concurrently and by the submittal date listed below in order to make adequate progress and to minimize the time and costs in the processing of your application. The submittal must be made to the PDS Zoning Counter at 5510 Overland Avenue, Suite 110, San Diego, CA 92123. For fastest service when submitting information requested in this letter, arrive at the PDS Zoning Counter between 8:00 a.m. and 10:00 a.m. Please note that all PDS Public Counters are closed daily from 11:45 a.m. through 12:30 p.m. Expect longer wait times before and after the lunchtime closure.

The submittal must include the following items:

1. A copy of this letter.

2. **SUBMIT A LETTER ADDRESSING EACH ITEM IN THE PROJECT ISSUE CHECKLIST (Attachment A), BY REFERENCE NUMBER.** This letter is required to detail how every unresolved item has been addressed in the resubmittal package.

3. The following information and/or document(s) with the requested number of copies as specified. **The Project Number and Environmental Log Number must be clearly and visibly labeled on all submitted documents. All changes to the previously submitted document(s) must be in strikeout/underline format.**

INFORMATION/DOCUMENT	# of Copies	Electronic Copy on CD/USB Drive	LEAD REVIEW DEPT./SECTION *(For Admin Purposes Only)*
Note: All PDF files have to be unlocked.			

INFORMATION/DOCUMENT	# of Copies	Electronic Copy on CD/USB Drive	LEAD REVIEW DEPT./SECTION *(For Admin Purposes Only)*
Note: All PDF files have to be unlocked.			
Revised **Form PDS-346**, signed by owner, updating Project Contact information and Engineer's name, if applicable. http://www.sandiegocounty.gov/content/dam/sdc/pds/zoning/formfields/PDS-346-FF.pdf	1	1 PDF	Heather Lingelser (1)
Project Issue Checklist Response Letter	3	1 PDF	Heather Lingelser (1), EIR Coordinator (1), PDS-LD (1) Business Rule: Project Issue Checklist Response Letter
Revised/Replacement Plot Plans • Plans must be folded to 8-1/2 x 11 maximum with the lower right hand corner exposed • If multiple pages, sheets must be stapled together.	9	1 PDF	Heather Lingelser (5), PDS-LD (3), LCPG (1) Business Rule: Plot Plan
Conceptual Landscape Plan	3	1 PDF	Heather Lingelser (1), Landscape Architect (1), EIR Coordinator (1); Business Rule: Landscape Plans
Visual Impact Analysis	2	1 Word Doc, 1 PDF	Heather Lingelser (1), EIR Coordinator (1), Business Rule: Visual-Impact-Report
Agricultural Analysis	3	PDF and Word	Heather Lingelser (1), EIR Coordinator (1), Dept. of Ag., Weights & Measures (1) Business Rule: Agricultural Study
Air Quality Study	3	1 Word Doc, 1 PDF	Heather Lingelser (1), EIR Coordinator (1), Air Quality Specialist (1) Business Rule: Air Quality Report
Biological Resource Report	3	1 Word Doc, 1 PDF	Heather Lingelser (1), EIR Coordinator (1), Biologist (1) Business Rule: Biological-Resource Report

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Conceptual Resource Management Plan	3	1 Word Doc, 1 PDF	Heather Lingelser (1), EIR Coordinator (1), Biologist (1) Business Rule: Resource Management Plan
Conceptual Revegetation Plan	4	1 Word Doc, 1 PDF	Heather Lingelser (1), EIR Coordinator (1), Biologist (1), Landscape Architect (1) Business Rule: Revegetation Plan
Archeological Report	3	1 Word Doc, 1 PDF	Heather Lingelser (1), EIR Coordinator (1), Cultural Resources Specialist (1) Business Rule: Cultural-Resource-Report
Archeological Report Confidential Appendix	1	1 PDF	Cultural Resources Specialist (1) Business Rule: Arch Survey Confidential
Reclamation Plan Text	4	1 Word Doc, 1 PDF	Heather Lingelser (1), EIR Coordinator (1), PDS-Land Development (1), Office of Mine Reclamation (1) Business Rule: Geology Report
Groundwater Investigation	2	1 Word Doc, 1 PDF	Heather Lingelser (1), EIR Coordinator (1) Business Rule: Groundwater Investigation
~~Phase I ESA~~/Hazardous Materials Information/Vector Management Plan	3	1 Word Doc, 1 PDF	Heather Lingelser (1), EIR Coordinator (1), Hazard Specialist (1) Business Rule: Vector Control Plan
Stormwater Pollution Prevention Plan (SWPPP)	3	1 Word Doc, 1 PDF	Heather Lingelser (1), PDS Land Development (2) Business Rule: Minor SWMP or Major – SWMP
Drainage/Flooding	3	1 Word Doc, 1 PDF	Heather Lingelser (1), PDS Land Development (2) Business Rule: Hydrology

INFORMATION/DOCUMENT	# of Copies	Electronic Copy on CD/USB Drive	LEAD REVIEW DEPT./SECTION *(For Admin Purposes Only)*
Note: All PDF files have to be unlocked.			
Well Destruction Permit (as necessary)	2	1 Word Doc, 1 PDF	Heather Lingelser (1), DEH (1) Business Rule: Well Destruction Permit
Noise Analysis	3	1 Word Doc, 1 PDF	Heather Lingelser (1), EIR Coordinator (1), Noise Specialist (1) Business Rule: Acoustical/Noise Analysis
Climate Change Analysis/Information	3	1 Word Doc, 1 PDF	Heather Lingelser (1), EIR Coordinator (1), Climate Change Specialist (1) Business Rule: Climate Change Analysis
Traffic Impact Analysis	3	1 Word Doc, 1 PDF	Heather Lingelser (1), PDS-LD (2) Business Rule: Traffic-Impact
Sight Distance Study	2	1 Word Doc, 1 PDF	Heather Lingelser (1), PDS-LD (1)
Valley Fever Report	3	1 Word Doc, 1 PDF	Heather Lingelser (1), Environmental Coordinator (1), HHSA (1)
Memorandums of Understanding according to Attachment B	5 Subject Areas (1 copy each)	1 PDF	Heather Lingelser (1) Business Rule: MOU
The staff turnaround goal for review of the requested information/document is 21 days.			

*Please contact me in advance for a Special Handling Form if you wish to submit other documents not listed above.

4. Deposits: In order to continue timely processing of your project, an additional deposit is required.

TRUST ACCOUNT ID#: 2032783-D-03380	
DEPARTMENT	**DEPOSIT AMOUNT**
PDS	$ 45,000.00
TOTAL DEPOSITS & FEES:	**$45,00.00**

RESUBMITTAL DUE DATE: In order to maintain adequate progress, PDS recommends that all of the revisions/information requested in this letter be submitted by **May 13, 2016.** If you are unable to submit the requested revisions/information by the above date, please contact your PDS Project Manager to submit a due date extension notification. Notification must be submitted in writing and be signed and dated by the project applicant. The notification must include a revised submittal date and a brief rationale for the extension.

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

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

Sincerely,

Heather Lingelser, Project Manager
Project Planning Division

Attachments:

Attachment A	Project Issue Checklist
Attachment B	Memorandum of Understanding
Attachment C	Additional information from Trails Specialist
Attachment D	Noise Report corrections
Attachment E	Valley Fever Report- corrections
Attachment F	Vector Management Plan- corrections

cc: Michelle Fehrensen, AECOM, 401 A Street, Suite 1200, San Diego, CA 92101
Carlos Lugo, Helix Water District, 7811 University Avenue, La Mesa, CA 91942

email cc:
Trina Abbott, ESA, tabbott@esassoc.com [with attachments]
Ed Sinsay, Team Leader, Land Development, PDS
Peter Eichar, Planning Manager, Planning & Development Services
Robert Hingtgen, Environmental Coordinator, Project Planning, PDS

ATTACHMENT A
PROJECT ISSUE CHECKLIST

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

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

ATTACHMENT A
PROJECT ISSUE CHECKLIST

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
Planning & Development Services (PDS) Project Planning Comments					
	Major Project Issues				
1		**Air Quality:** The project has the potential to significantly contribute to the violation of an air quality standard or significantly contribute to an existing or projected air quality violation, primarily related to ground disturbance, construction equipment, and on-road mobile sources associated with the mineral extraction process. Therefore, the project is required to discuss the project's potential impacts to air quality. An Air Quality technical study must be prepared for the proposed project. Additionally, emissions from the proposed project have the potential to affect sensitive receptors within the El Monte Valley and along truck haul routes. Impacts to sensitive receptors must be evaluated through a health risk assessment that analyzes onsite emissions as well as emissions from haul trucks traveling to and from the site. The analysis must include all feasible mitigation measures to reduce significant impacts.		3/11/16	
2		**Biological Resources:** An endangered species (least Bell's vireo) is known to be historically present on or immediately adjacent to the project site. The project will require a Section 7 Endangered Species Act take permit if mining is to be done in the vicinity of the occupied habitat.		3/11/16	
3		**Noise:** (a) The proposed mining operation is subject to the one-hour average 75 dBA property line requirement pursuant to the County Noise Ordinance, Section 36.404. Combined noise levels from the mining/extractive uses and additional truck traffic has a potential to expose off-site existing residences to direct and cumulative noise impacts. A noise study will be required to demonstrate compliance with the County Noise Ordinance and County Noise Element.		3/11/16	

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4		**Groundwater Resources:** When determining a project's environmental impact, the County of San Diego (County) relies, in part, on the County's approved Guidelines for Determining Significance and Report Format and Content Requirements which can be found on the World Wide Web at http://www.sdcounty.ca.gov/PDS/docs/GRWTR-Guidelines.pdf (Guidelines) http://www.sdcounty.ca.gov/PDS/docs/GRWTR-Report-Format.pdf (Report Format). According to these guidelines, a proposed project would be considered to have a significant impact on the environment if a soil moisture balance concluded that groundwater in storage would be reduced to a level of 50% or less. PDS Staff has prepared a detailed Groundwater Resources Scope of Work to be used in preparing the necessary analysis and results.		3/11/16	
5		**Resource Management Plan:** Due to the uniqueness of the project and consistent with our discussions, the County will consider combining the requirements for revegetation, landscaping and, reclamation into one document and possibly integrate into the required Resource Management Plan. Please note that at this time staff is willing to consider this approach to aid processing time and ensure consistency with the requirements of each plan; combined into one document may prove to be an efficient way of meeting that goal. However, if during the processing of this application that staff decides this request cannot be accommodated; each plan will need to be submitted separately.		3/11/16	

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6		**Net-zero Water Use:** Consistent with the revised project description, your project intends to be neutral in terms of consuming groundwater and will utilize water provided by Helix Water District for mining operations. Potable water will be supplied via a vender for mining personnel. Revegetation efforts, especially within the riparian areas will require irrigation to ensure plant establishment. It is important that when the consumptive use of water is discussed within the context of this proposed project, that the source and purpose are clearly indicated. County staff's current understanding is the goal for mining operations is to not use groundwater.		3/11/16	
1 - 1	Plot Plan	Project description on Page 1 of 8 describes 225 acre project boundary. This is different than the overall project description documentation. Revise as necessary to be consistent throughout all documents. On Page 1 of 8, include the total MUP/RP boundary acreage, the total acreage of the excavation pit, the total acreage of each phase to be mined, and the total acreage of each of the pits to be filled east of the main mining pit.		6/15/15	
1 - 2	Plot Plan	Page 2 of 8 and 3 of 8 have scaling issues. The scale is wrong on at least one of the sheets. Please check 1"=100' and 1"=300' and determine the correct scale to be used. Also, check all other sheets scales to ensure correct scales are being used.	Comment Addressed	6/15/15	5/2/16
1 - 3	Plot Plan	Page 4 of 8: The Typical Plant Detail needs more detail to show all structures including truck scales, parking area(s), equipment storage area(s), etc.	Comment Addressed on sheet 3	6/15/15	5/2/16
1 - 4	Plot Plan	Page 4 of 8: The haul road on the Typical Plan Detail runs directly through a berm. Revise. Additionally, the berm in the detail does not match the berm shown on the main layout. Revise to be consistent.		6/15/15	
1 - 5	Plot Plan	Page 5 of 8: Pit grading typical section includes a 120-foot bench which is not consistent with 30-foot benches shown on plans and other cross sections. Revise to be consistent.	Comment Addressed	6/15/15	5/2/16

ATTACHMENT A
PROJECT ISSUE CHECKLIST

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
1 - 6	Plot Plan	Page 6 of 8, Revegetation Plan: This sheet needs to show where the various plant palletes are going to be to be planted. Please include total number of acres of each plant pallette by phase. Also include individual planting plan for any container plants and include performance standards pursuant to SMARA for each plant pallette to be used. **2nd Request. Information contained in Table 6, Figure 7 on page 31, and Performance Standards in Section 6.1 of the draft revegetation plan dated March 11, 2016 adequately address this comment, however, typical layouts for container planting within these plant communities has not been resolved. Please provide documentation of how the 77% of disturbed lands, as called out in Section 1.3 will be reclaimed and where the remaining 23% is located. Verify that all acreages match throughout report and explain any discrepencies.**		6/15/2015 **4/19/2016**	
1 - 7	Plot Plan	Final plan will be required to be signed and stamped by R.C.E.		6/15/15	
1 - 8	Plot Plan	Include specifications for access roads off of El Monte Road that that meet PDS Land Development and fire requirements. Current plan has no details. **Second Request**		6/15/2015 5/2/2016	
1 - 9	Plot Plan	Include the community plan area on the front sheet.	Comment Addressed.	6/15/15	5/2/16
1 - 10	Plot Plan	Include Zoning and General Plan designations on front sheet.	Comment Addressed.	6/15/15	5/2/16
1 - 11	Plot Plan	Clarify how the Haul Roads will function through each of the four phases. Include haul road plan as project progresses through each of the phases. Currently, haul roads are shown on very steep slopes in places and don't appear feasible as drawn. **Second Request**		6/15/2015 5/2/2016	
1 - 12	Plot Plan	Clarify the ingress and egress plan for each phase of the project, particularly throughout phase 4 as the pad level changes due to excavation. Demonstrate that the slope of the ramps will meet driveway standards. **New comment**		5/2/16	
1 - 13	Plot Plan	More detail is needed of western leading edge slope as the mine progresses westward. Please include detail of slope and maximum slope inclination. **Second Request**		6/15/2015 5/2/2016	

ATTACHMENT A
PROJECT ISSUE CHECKLIST

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
1 - 14	Plot Plan	Please note the water table at the site has significantly fluctuated in the past. Geotechnical analysis has been requested to address shallow groundwater conditions that may occur during the life of this mine. Revise slopes as necessary in accordance with geotechnical investigation recomendations to ensure stability during shallower groundwater conditions.	Comment Addressed.	6/15/15	4/19/16
1 - 15	Plot Plan	The plans must show the 100-year floodplain and 100-year floodway on all sheets.	Comment Addressed.	6/15/15	
1 - 16	Plot Plan	Include all well locations on the Plot Plan. **Second Request. Well locations shown on cover sheet only, include well locations on other plan sheets**		6/15/15 5/2/16	
1 - 17	Plot Plan	It appears there may be electrical utilities that are within the proposed excavation footprint. All utilities that will require re-routing require plans on how re-routing will occur.		6/15/15	
1- 18	Plot Plan	Remove flammable vegetation (erigonium, s. mellifera) from hydroseed mix. **2nd Request. Section 2.3, and Tables 12 and 17 within the draft revegetation plan, dated March 11, 2016 still refer to flammable vegetation. Please remove or provide justification for it's use and coordination with the projects' Fire Protection Plan.**		4/19/16	
1- 19	Plot Plan	Sheet 6 of 8 - add typical planting layouts for each of the four habitats that shows spacing and location of container stock. Show graphically on the slope, where each of the four habitat types will be located, include dimensions. **2nd Request. Not shown in draft revegetation plan as indicated on response to comments. Coordinate with Comment 1-6 above and information contained in the Reclamation Plan and provide in draft revegetation plan.**		4/19/16	
1- 20	Plot Plan	Table's 6A-6D - provide acreages for all four habitats to be established. **2nd Request. Coordinate with Comment 1-6 above and provide necessary information within the draft revegetation plan.**		4/19/16	
1- 21	Plot Plan	Sheet 1 of 1: Legend does not include the 2 different cross hatched symbols shown on sheets 2 and 3. Add the 2 cross hatching symbols to the legend and identify. **New comment**		5/2/2016	

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Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
1- 22	Plot Plan	Sheet 2 of 6: Haul road note states "Ramps will be constructed within mining pit, as needed to provide access up and down the pit slopes." Clarify whether this means that access road locations for trucks entering and exiting the site would be changing during the project phases. **New comment**		5/2/2016	
1- 23	Plot Plan	Provide additional information regarding ramps and ramp locations, including what are ramps "constructed" from and where would they be located. **New comment**		5/2/2016	
1- 24	Plot Plan	Sheet 2 and 3 of 6: Cross hatching area not identified, north of phase 4 area just south of Willow Road. Identify this area on sheet 2 and 3 and add to the legend on sheet 1. **New comment**		5/2/2016	
1- 25	Plot Plan	Sheet 2 and 3 of 6: Cross hatching area not identified, center of Phase 3 area just south of the graded slope. Appears to be location of mature riperian vegetation. Identify these areas on sheet 2 and 3 and add to the legend on sheet 1. **New comment**		5/2/2016	
1- 26	Plot Plan	Sheet 6 of 6: Incorrect APN on plan, "392-050-43" is not a valid APN. Appears that the APN should be changed to "392-050-47", please verify and make corrections. **New comment**		5/2/2016	
2- 1	Reclamation Plan Text	SMARA 2770.5 Please verify whether the project lies within 1-mile of a state highway bridge. If so, contact Caltrans.	Comment Addressed. The closest Caltrans bridge is on SR-67 nearly 1.2 miles from the boundary of the site.	6/15/15	4/19/16
2- 2	Reclamation Plan Text	SAMARA 2772(c)(9) Section 3.14: Include more detail as to how the project footprint is being maximally mined to remove all economically recoverable resources. **4/19/2016: The text incorrectly states that reclamation will have no effect on future mineral resource recovery. Due to the site's end use of habitat, a nature preserve, and open space easements, there will be a permanent loss of mineral resources. Revise this section to indicate the permanent loss of mineral resources that will occur at the site. This information can be obtained from the mineral resources evaluation once revised pursuant to County requested revisions.**		6/15/2015 4/19/2016	

ATTACHMENT A
PROJECT ISSUE CHECKLIST

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
2- 3	Reclamation Plan Text	CCR 3502(b)(2), Section 6.14 Public Safety: Public health and safety not fully addressed in the text. Please explain how public access will be controlled at the site given the nearby proximity of recreational trails directly adjacent to mining areas. Please remove the statement regarding extreme steep slopes as a way to limit access. The slopes are 2H:1V which is still accessible to the public. Fencing and/or other barriers to the site are necessary and must be described in detail and depicted on the Plot Plan. **4/19/2016: Second Request.**		6/15/2015 4/19/2016	
2- 4	Reclamation Plan Text	CCR 3713(b) Please state how the site is gated or protected from public entry, and to preserve access to wildlife. Section 2.1.0. of the text proposes 4-strand barbed wire fencing would be used. A meeting is necessary with PDS staff to determine whether 4-strand and/or other fencing/barriers should be used to preserve access to wildlife and protect the public from entry. **4/19/2016: Second Request.**		6/15/2015 4/19/2016	
2- 5	Reclamation Plan Text	CCR 3709(a) Equipment storage area not designated on Reclamation Plan. Please indicate where equipment will be stored on site. There should be a designated area for construction equipment to be stored. It should also be shown on the Plot Plan. **4/19/2016: The storage and maintenance area is now shown on the Plot Plan within the typical processing plant detail. However, on Figure 2.4-1 of the Reclamation Plan text the same feature is labeled as office. If the plan is to have an office, storage yard, and maintenance area in this location, include this in the description on both the Plot Plan and Figure 2.4-1.**		6/15/2015 4/19/2016	
2- 6	Reclamation Plan Text	CCR 3713(a) The Plot Plan shall include the location of all water wells on the project site. If any water wells are in areas to be mined, they will be required to be properly abandoned through a well destruction permit to be obtained from the County Department of Environmental Health. **4/19/2016: There is now a 1"=2000' map on Sheet 1 that shows the wells. Include the existing well locations on Sheet 2 of the Plot Plan so it is clear whether there are wells in the areas to be mined and which phase the wells are located.**		6/15/2015 4/19/2016	

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Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
2- 7	Reclamation Plan Text	CCR 3502(b)(3) A slope stability analysis is necessary to determine the critical gradient of slopes to be created in alluvial materials. Please revise Reclamation Plan text as necessary with slope stability findings.	Comment Addressed.	6/15/15	4/19/16
2- 8	Reclamation Plan Text	CCR 3704(b) For resource conservation, the geotechnical investigation shall include compaction standards for this type of use. Include the information to be provided from the geotechnical investigation on compaction in the reclamation plan text.	Comment Addressed.	6/15/15	4/19/16
2- 9	Reclamation Plan Text	CCR 3710(a) Section 1.8 requires revisions to surface water and groundwater protection with specific best management practices and any other site-specific measures to protect from siltation and pollutants that may diminish water quality with a focus on the surface water body to be created by mining. **4/19/2016: Second Request.**		6/15/2015 4/19/2016	
2- 10	Reclamation Plan Text	CCR 3706(b) A groundwater study is required as part of this project. This information will be used to asses whether the mine will diminish or affect nearby groundwater users. Insert the findings of the groundwater investigation into the Reclamation Plan text. Summarize potential impacts to groundwater and any mitigation measures identified. **4/19/2016: Second Request.**		6/15/2015 4/19/2016	
2- 11	Reclamation Plan Text	SMARA 2773(a) Site specific sediment and erosion control should be shown on plans and/or explained in greater detail in order to be readily understandable and implementable by the mine operator.	Comment Addressed.	6/15/15	4/19/16
2- 12	Reclamation Plan Text	CCR 3503(b)(1) Please include text regarding settling ponds providing significant benefits to water quality versus not utilizing them.	Comment Addressed.	6/15/15	4/19/16

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Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
2- 13	Reclamation Plan Text	CCR 3706 (c) Erosion and sediment control is required to be controlled during all phases of construction, operation, reclamation, and closure of a the surface mining operation to minimize siltation of lakes and watercourses (San Diego River streambed). Describe erosion and sediment control measures to be used to minimize siltation of lakes and watercourses. **4/19/2016: Section 3.12 states that small desiltation basins "may" be constructed. If they are needed based on the need to capture sediment and avoid potential off-site impacts they word should be changed to "shall." If not, they should be removed as an option.**		6/15/2015 4/19/2016	
2- 14	Reclamation Plan Text	CCR 3503(a)(2) There is the potential for large stockpiles of waste fines to be generated prior to placement into the pit. Beyond dust suppression through watering, please describe how these wastepiles will be managed to minimize water and wind erosion including temporary re-vegetation of stockpiles, BMPs, etc.	Comment Addressed.	6/15/15	4/19/16
2- 15	Reclamation Plan Text	In-Stream Mine: Plan does not address stream impact. Include findings from biological resources report, drainage study, and geotechnical study to address impacts from in-stream mining. Very little details are currently in the text due to the lack of studies completed for the project. **4/19/2016: Second Request. Now that studies have been completed, include findings from the reports.**		6/15/2015 4/19/2016	
2- 16	Reclamation Plan Text	CCR 3503(a)&(b)&(c): A biological report will need to include sensitive species in the riparian area and protection measures identified for protection of wildlife habitat. Include details from biological report to meet these CCR sections. **4/19/2016: Second Request. Now that studies have been completed, include findings from the reports.**		6/15/2015 4/19/2016	
2- 17	Reclamation Plan Text	CCR 3704(g) Discuss if any permanent placement of piles or dumps of mining waste and overburden is going to occur within wetlands. If so, please discuss if there are impacts to wetlands that will require mitigation.	Comment Addressed. No stockpiles will be left on site. The project will be conditioned to ensure all stockpiles are removed prior to final reclamation.	6/15/15	4/19/16

ATTACHMENT A
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Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
2- 18	Reclamation Plan Text	CCR 3711: Section 6.11 indicates soil will directly be placed on benches. This doesn't seem feasible given that soils will be disturbed long before benches are created. Topsoil stockpiles will likely be required. Show topsoil stockpile locations on the plot plan. If the amount of topsoil needed to cover all surfaces to revegetated is not going to be adequate, please indicate other media that is suitable for use and stockpile location(s) for this material on the plot plan. **4/19/2016: Soil stockpile locations were not shown on the plot plan per this request which is not required. However, include language that the top soil and suitable growth stockpiles shall be clearly identified to distinguish them from mine waste dumps.**		6/15/2015 4/19/2016	
2- 19	Reclamation Plan Text	CCR 3704(c) Procedures need to be properly identified in what will be done with the mine waste stockpiles in the time prior to dumping into ponds.	Comment Addressed	6/15/15	4/19/16
2- 20	Reclamation Plan Text	CCR 3705 (c) Please discuss whether decompaction of any areas that will be compacted.	Comment Addressed	6/15/15	4/19/16
2- 21	Reclamation Plan Text	CCR 3705(d) Roads stripped of road base materials, resoiled and revegetated, unless exempt: Road are mentioned in section 3.1 but more detail is needed concerning how these roads will be reclaimed. **4/19/2016: Include any roads which the property owner requests to remain would require lead agency approval.**		6/15/2015 4/19/2016	
2- 22	Reclamation Plan Text	CCR 3705(l) Plant protection measures, fencing, caging where needed for success: Please include as necessary.	Comment Addressed. Discussed within the draft revegetation plan, dated March 11, 2016.	6/15/15	4/19/16
2- 23	Reclamation Plan Text	Section 3.5 - define 'solid-set sprinklers'. All irrigation, whether permanent or temporary, shall be compliant with the County's Water Conservation in Landscaping Ordinance.	Comment Addressed	6/15/15	4/19/16
2- 24	Reclamation Plan Text	Section 3.8 - explain why comparison with an off-site reference area is not necessary when the goal of the revegetation effort is to visually blend in with the surrounding off-site vegetation.	Comment Addressed	6/15/15	4/19/16
2- 25	Reclamation Plan Text	Section 3.8 - transect data with off-site reference data would better define success criteria - coordinate with Section 3.15 and provide results of percent cover by native species, percent covered by weeds, and species diversity.	Comment Addressed	6/15/15	4/19/16
2- 26	Reclamation Plan Text	What is Table 7 based on? How were the percentages and success criteria established? How was Year 3 determined to be the end of monitoring?	Comment Addressed	6/15/15	4/19/16

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Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
2- 27	Reclamation Plan Text	Section 3.9 - show the locations of all the test plots on Sheet 6 of 8. Coordinate with Table 7. Show the 12 transect locations discussed in Section 3.15.	Comment Addressed	6/15/15	4/19/16
2- 28	Reclamation Plan Text	Provide discussion in report about providing County with annual monitoring reports until success criteria has been met and accepted by County.	Comment Addressed	6/15/15	4/19/16
2- 29	Reclamation Plan Text	Provide a detailed cost estimate for landscape-related proposed planting, irrigation, maintenance, monitoring, and report preparation.	Comment Addressed	6/15/15	4/19/16
2- 30	Reclamation Plan Text	Pursuant to the requirement of SMARA 2772(c)(1), include the name and address of the new agent that will be preparing the reclamation plan text.		4/19/16	
2- 31	Reclamation Plan Text	The maximum depth of mining should be stated as 35 feet, not 30 feet.		4/19/16	
2- 32	Reclamation Plan Text	CCE 3706(e) requires that altered drainages shall not cause increased erosion and sedimentation. Evaluate whether increased erosion or sedimentation would occur. If it is, mitigating alternatives shall be proposed and included in the reclamation plan to assure that runoff shall not cause increased erosion or sedimentation.		4/19/16	
2- 33	Reclamation Plan Text	A review by DPW Flood Control will be requested to determine any requirements or restrictions that will be applied to the Major Use Permit to address storage of materials in a floodway pursuant to Section 5472 of the Zoning Ordinance. All uses that are proposed within the flood way must be evaluated to determine whether or not it will create a hazard to the health and safety of persons or property in the event the materials are inundated. This includes parking operating motor vehicles, equipment, office trailers, and any other materials.		4/19/16	
2- 34	Reclamation Plan Text	Please include language that in-stream surface mining operations shall be conducted in compliance with Section 1600 et seq. of the California Fish and Game Code, section 404 of the Clean Water Act, and Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. 403).		4/19/16	
2- 35	Reclamation Plan Text	Please include language that surface mining and reclamation activities shall be conducted to protect on-site and downstream beneficial uses of water in accordance with the Porter-Cologne 47 Water Quality Control Act, Water Code section 13000, et seq., and the Federal Clean Water Act, 33 U.S.C. section 1251, et seq.		4/19/16	

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Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
3- 1	Revegetation Plan Text	Section 2.1.3 - indicate that final landscape construction documents and specifications shall include coordination with Sections 4.4.8, 4.5, and 4.6.	New Comment	4/19/16	
3- 2	Revegetation Plan Text	Section 2.2.2 - Figure 8 is missing. Clarify if this is new information or should be a reference to Figure 4. Text currently has two Figure 7's. Please review and make necessary revisions.	New Comment	4/19/16	
3- 3	Revegetation Plan Text	Section's 2.5, 2.5.1, and 2.5.2 - provide information on what will go in to these estimates. If cost amounts are known yet, or will change in the future, at least provide all applicable line items. Include fencing, signage, site preparation, soils analysis reports, fertilizer/innoculum, container plants, hyroseed, dry seed, labor to install, seed collection, irrigation (installation and removal), weeding, mulching, water truck, 20% contingency factor, 3% annual inflation factor, construction document preparation, annual report preparation, maintenance, monitoring, etc. Break down by each proposed phase.	New Comment	4/19/16	
3- 4	Revegetation Plan Text	Indicate if any exisitng vegetation will be harvested from the site and boxed, maintained, and transplanted in to the final layout. If so, show locations of existing vegetation to be transplanted, provide discussion about how this will be done, where on the site the boxed containers will be located and maintained until such time as ready for planting	New Comment	4/19/16	
3- 5	Revegetation Plan Text	Section 3.1.1.3 and Section 3.5.2 - clarify relationship between fencing installed by El Monte Nature Preserve, LLC and maintenance responsibilities of the Helix Water District.	New Comment	4/19/16	
3- 6	Revegetation Plan Text	Section's 4.2.2 and 4.3 - clarify if securities and revegetation agreements will be provided for each phase or if one security and agreement will be established and in place for the length of all four phases.	New Comment	4/19/16	
3- 7	Revegetation Plan Text	Section 4.5.4 - confirm that Figure 6 is the correct reference.	New Comment	4/19/16	
3- 8	Revegetation Plan Text	Consider the preparation of both landscape and irrigation plans to be included with the draft revegetation plan to better define the project scope of work, locations of necessary components of the revegetation plan, coordination with the grading and reclamation plans, fencing and access points, and location of existing vegetation to remain, or be transplanted.	New Comment	4/19/16	

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Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
3- 9	Revegetation Plan Text	All changes to the document must be in strikeout/underline format.	New Comment (Biologist)	4/19/16	
3- 10	Revegetation Plan Text	Please clearly label as a Conceptual Revegetation Plan as some compoenents need completion to be final.	New Comment (Biologist)	4/19/16	
3- 11	Revegetation Plan Text	Page 5: "..would result in approximately 77 percent of the disturbed lands being reclaimed by the time extractive operations are complete." Please complete this discussion by explaining why the remaining lands are not being reclaimed.	New Comment (Biologist)	4/19/16	
3- 12	Revegetation Plan Text	Please add a discussion about oaks on site (*Q. agrifolia*?) and include plans to replace those lost to impacts.	New Comment (Biologist)	4/19/16	
3- 13	Revegetation Plan Text	Page 30: Total impact acreage does not match that stated in the BRR.	New Comment (Biologist)	4/19/16	
3- 14	Revegetation Plan Text	Page 61: Please adjust avian breeding season to February 15 - September 15.	New Comment (Biologist)	4/19/16	
3- 15	Revegetation Plan Text	Page 62: Please define "high-risk invasive species"	New Comment (Biologist)	4/19/16	
3- 16	Revegetation Plan Text	Page 66: Please strike releve' sampling from the document. Releve' is a semi-quantitative method using visual estimates that is primarily useful for classifying and mapping large areas of vegetation or when validating previous mapping. Because this is a restoration site, quantitative methods must be used.	New Comment (Biologist)	4/19/16	
3- 17	Revegetation Plan Text	CRAM wetland assessments will be required per USACE permits. Please add a section addressing specific restoration components to improve functions and values to meet CRAM criteria; e.g. ways to improve structural path richness, topographical complexity, and biotic structure.	New Comment (Biologist)	4/19/16	
3- 18	Revegetation Plan Text	Page 59: Please add *Sisymbrium* species, *Salsola tragus* , and *Dittrichia graveolens* to target exotic species. They are either in the area or are likely to be brought in to the site as activities commence. Please also give thought to other species that may be brought in on boots, tires and equipment.	New Comment (Biologist)	4/19/16	
3- 19	Revegetation Plan Text	Page 67, 6.6.1: Change "March/April for grassland and scrub habitats" to "March/April/May for grassland and scrub habitats; exact timing will depend upon current rainy season conditions".	New Comment (Biologist)	4/19/16	

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Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
3- 1	Agriculture	Staff has reviewed the Agricultural Memorandum, which also includes a Local Agricultural Resource Assessment (LARA) Model dated February 23, 2016, prepared by Bobbette Biddulph and Camille Castillo and submitted to the County on March 14, 2016. The report requires revisions as detailed in the following comments.		4/14/2016	
3- 2	Agriculture	Please clarify if the results from the "Feasibility Study for the El Monte Valley Recharge Project" pertains to the general facility of El Monte Valley or specifically to the project site. If the results pertains to the general vicinity of the Valley, then further study may be needed to demonstrate site-specific groundwater quality.		4/14/2016	
3- 3	Agriculture	Remove words/terms such as "tend to", "generally", etc.		4/14/2016	
3- 4	Agriculture	Please include a discussion pertaining to potential indirect impacts to the existing agricultural uses located in the vicinity. .		4/14/2016	
3- 5	Agriculture	Please provide supporting document to demonstrate and justify the conclusion that the TDS level for groundwater quality onsite exceeds 600mg/L.		4/14/2016	
3- 6	Agriculture	Page 4: Please revise " Accodring to the Guidelines, TDS levels above 500mf/L are problematic for may of the subtropical crops produced in San Diego County…" by including the rest of the sentence as shown in the last paragraph on page 26 of the Guidelines. ("...concentrations above 600mg/L was selected as the guideline to take into acocunt the already elevated TDS concentrations in imported water sources.		4/14/2016	
4 -1	Air Quality	Page 4- The project life span indicated on this page is 16 years. On page 38 the analysis says it would be 19 years. This needs to be verified and made consistent.		4/18/2016	
4 -2	Air Quality	Page 19- Regulatary setting regardsin CA Green Building Code- is this relevent? If so, how? Add explanation		4/18/2016	
4 -3	Air Quality	Page 25- "The SDAPCD does not have qualitative thresholds for determining significance of construction or operational impacts." Should "qualitative" be quantitative?		4/18/2016	

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Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
4 -4	Air Quality	Page 28, Toxic Air Contaminants- a 30 and 25- year expsoure period was used for the modeling. Are these consistent with the operational length of the project? It is stated that the project would be operational for 16 years. Add some description that ties these years to the potential length of exposure from the mining operations. Would this exposure be considered conservatively high? Is there a possibility that operations could extend beyond 16 years?		4/18/2016	
4 -5	Air Quality	Page 37- Besides DPM and Silica, are there other operations, such as batching, that might generate other air toxics that need to be considered?		4/18/2016	
4 -6	Air Quality	Page 37- Between the 25 year and the 30 year exposure, there is a big jump in the risk numbers. Is this due to the modeling imputs being different for the residential vs occupational exposure? Perhaps a little clarification may be warranted here.		4/18/2016	
4 -7	Air Quality	Page 38- see comment 1 about inconsistent project length.		4/18/2016	
5 -1	Climate Change	Climate Change Report will be reviewed will review upon receipt		4/18/2016	
6- 1	Biology	Staff has reviewed the Biological Technical Report dated March 11, 2016 prepared by ESA and submitted to the County on March 14, 2016. The report requires revisions as detailed in the following comments.		4/19/2016	
6- 2	Biology	All changes to the document must be in strikeout/underline format.		4/19/2016	
6- 3	Biology	A vast amount of the the site is categorized as (vegetated) disturbed habitat. Staff questions the categorization of disturbed habitat vs. non-native grassland based on the description and presence of NNG species.		4/19/2016	
6- 4	Biology	Staff biologist will schedule a site visit along with ESA (biology consultant). The comments below may be revised following that site visit.		4/19/2016	
6- 5	Biology	Figure 5: Access road is shown extending beyond impact boundaries.		4/19/2016	

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Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
6- 6	Biology	Page 74: "…could provide potential golden eagle foraging habitat, however, this is unlikely given the lack of eagle nesting within 4,000 feet of the project area." Golden eagles will forage well beyond 4000 feet from a nest. It is presumed that this statement is directed towards the 4000-foot no-disturbance zone established in the county significance guidelines. In addition, on page 46 the golden eagle is stated to have a high potential to occur within the project area, which conflicts with statement on page 74. Please re-write for internal consistency and analyze potential for foraging and impacts utilizing citable golden eagle literature.		4/19/2016	
6- 7	Biology	Page 91: Avoidance of CSS should be targeted at patches of high-quality habitat as well as occupied California gnatcatcher habitat.		4/19/2016	
6- 8	Biology	Page 92: Oak tree loss is not discussed or accounted for, and replacement oaks do not appear in the revegetation plan. Please add a discussion about oaks on site (Q. agrifolia?) and include plans to replace those lost to impacts.		4/19/2016	
6- 9	Biology	Page 90, 4.2.E: Please discuss how the Mature Riparian Woodland will not be impacted by mining acitivities and resultant streambed elevational (flow) decrease. Please discuss how the Mature Riparian Woodland will not be impacted by the proximity of the haul road.		4/19/2016	
6- 10	Biology	Appendix E: Tree survey memo. Were these trees *Quercus dumosa* and not *Quercus agrifolia*?		4/19/2016	
6- 11	Biology	Figure 4: This map shows distinct clusters of oak trees in the eastern portion of the site. Please explain why these clusters were not mapped as oak woodland or disturbed oak woodland.		4/19/2016	
6- 12	Biology	Staff has reviewed the Jurisdictional Delineation dated March 11, 2016 prepared by ESA and submitted to the County on March 14, 2016. The report requires revisions as detailed in the following comments.		4/19/2016	
6- 13	Biology	All changes to the document must be in strikeout/underline format.		4/19/2016	
6- 14	Biology	A vast amount of the the site is categorized as (vegetated) disturbed habitat. County staff questions the categorization of disturbed habitat vs. non-native grassland.		4/19/2016	
6- 15	Biology	Staff biologist will schedule a site visit along with ESA (biology consultant). The comments below may be revised following that site visit.		4/19/2016	

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Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
6- 16	Biology	This delineation must also delineate widths of CDFW jurisdictional state streambeds, which are generally wider than USACE WoUS/RWQCB WoS		4/19/2016	
6- 17	Biology	Figure 5 does not fully follow the mapping standards of USACE. Specific changes that need to be made are detailed in the following comments.		4/19/2016	
6- 18	Biology	Figure 5 is missing GPS control points; please add. At least two are required by the mapping standards of USACE.		4/19/2016	
6- 19	Biology	USACE mapping must include "representative ordinary high water mark (OHWM) widths where measured in the field". Please add.		4/19/2016	
6- 20	Biology	CDFW jurisdictional State Streambeds and CDFW riparian habitat should be shown on separate figure(s) from the USACE/RWQCB delineation. Please provide separate figures.		4/19/2016	
6- 21	Biology	Please provide additional discussion and documentation regarding the delineation of the tamarisk scrub in the center reach of the project boundary that is described as being not CDFW jurisdictional riparian. This vegetation would be expected to be dependent on "a nearby freshwater source" and therefore CDFW jurisdictional.		4/19/2016	
6- 22	Biology	Provide a separate figure showing the FEMA flood plain boundaries.		4/19/2016	
6- 23	Biology	The Ponded Area is described as having "its source being a stream" but no jurisdictional features are delineated entering or leaving the feature. Please provide additional clarification of the status as an adjacent vs. isolated wetland.		4/19/2016	
6- 24	Biology	"Each line or polygon representing a water of the U.S. must be labeled with a unique name"		4/19/2016	
6- 25	Biology	References section is missing "National List of Plant Species that Occur in Wetlands; California" that is referred to in the text.		4/19/2016	
7- 1	Cultural	Cultural Resources Report will be reviewed upon receipt. See Attachment H of the Scoping Letter dated March 11, 2016			
7- 2	Cultural Testing Plan	Submitted 4/12/16	Under review- Cultural Testing Plan comments will be forwarded separately		

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Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
8- 1	Fire Protection Plan- Letter Report	San Diego County Fire Authority staff have reviewed the Fire Protection Plan—Letter Report prepared by Firewise 2000, Inc., dated February 23, 2016, and the revised Plot Plan dated March 10, 2016. Our department finds the project acceptable as currently submitted.	N/A		4/10/2016
9- 1	Geotechnical Investigation	PDS staff has reviewed the Slope Stability Investigation, proposed El Monte Sand Mine and Nature Preserve Project, Lakeside, California, prepared for El Monte Nature Preserve, LLC dated January 27, 2016. The investigation is considered accepted.	N/A	4/19/16	4/19/16
10- 1	Groundwater Study	Groundwater Resources Report will reviewed upon receipt. See Attachment O of the Scoping Letter dated March 11, 2016		6/15/15	
11- 1	Mineral Resource Report	PDS Staff has reviewed the Mineral Resource Technical Report prepared by Lieghton Consulting, Inc. dated March 14, 2016 and has the following comments:	N/A	4/19/16	N/A
11- 2	Mineral Resource Report	Section 4.1.1. Marketability and Minimum Dollar Value: This section requires an economic analysis of mineral resources that could be potentially lost as a result of the project. It must specifically indicate how much material is potentially available beneath the site, the amount of material to be left at the site, and the dollar amounts associated with these amounts of material.		4/19/16	
11- 3	Mineral Resource Report	Section 4.2.1. Provide a specific quantity of material and the dollar amount of potentially lost mineral resources as a result of the project.		4/19/16	
11- 4	Mineral Resource Report	Section 4.2.2. Specifically quantify how much material after mitigation of mining 10.3 million tons of sand would be left in the ground and effectively lost.		4/19/16	
12- 1	Noise	Staff has reviewed the Noise Impact Analysis dated February 2016 prepared by LSA and submitted to the County on March 14, 2016. The report requires revisions as detailed in the following comments.	General comment.	5/5/2016	5/5/2016
12- 2	Noise	As discuses within the noise report, the hours of operation will be limited to weekdays from 7am to 5pm. Hours of operation will be a part of the Major Use Permit conditional requirements.		5/5/2016	

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12- 3	Noise	On page 20, Section 3.1.1, Table K, this needs to include the duty cycle reference column. Note that the table results currently shown appear to be based on attenuation by distance alone. Please explain/show that duty cycles have been taken into consideration and justify for these reductions.		5/5/2016	
12- 4	Noise	Please see attachment redline of comments to the Table of Contents. Revise sections and to me similar to the redline recommendations.		5/5/2016	
12- 5	Noise	The Project Impacts Section must include the following subsections: 1. Temporary Construction Site Preparation 2. Operational Activities 3. Traffic Related 4. Vibrations Note this is an example to simplify the report layout to reflect the following County Noise Standard: 1. Noise Ordinance, 36.408, 409, 410 2. Noise Ordinance, 36.404 3. Noise Ordinance, 36.404 and Noise Element 4. Noise Guidelines for Vibration		5/5/2016	
12- 6	Noise	The statement within Section 3.1.2 must be revised. Remove this statement and replace with a construction site preparation assessment.		5/5/2016	
12- 7	Noise	Within the temporary site preparation section, please asses all the occupied properties immediately adjacent or close proximity to the site. An aerial figure illustration showing the existing neighboring residences and neighboring occupied properties must be disclosed to determine which boundary line applies to the 75 dBA 8-hr Leq (Section 36.409).		5/5/2016	

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Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
12- 8	Noise	Note that temporary construction site preparations are subject to the 75 dBA 8-hr Leq at the occupied boundary line. Operational Mining Activities are subject to the one-hour average at the project property line. Please make sure temporary site prep assessment reference an 8-hr average and the operational mining activities reference a one-hour average requirement. 1-hr Leq vs. 8-hr Leq. Explain this within the executive summary.		5/5/2016	
12- 9	Noise	The mitigation measure section must include measures such as limiting operations to meet the duty cycle assumptions, hour of operation limitations, setback distance requirements, and any other noise reducing features needed to comply with the County Noise Ordinance.		5/5/2016	
12- 10	Noise	Within the Traffic Noise Impact section, please describe how the traffic ADT was assessed as it relates to truck trips. Disclose the additional project ADT on nearby roadways. Additionally, describe whether there is a passenger car equivalent for the truck trips (if applicable). For example, x3 cars for each truck?		5/5/2016	
13- 1	Valley Fever Report	See comments noted in word version of the document		4/19/16	
14- 1	Vector Management Plan	See comments noted in word version of the document		4/21/16	
15- 1	Visual Impact Analysis	Visual Impact Analysis will reviewed upon receipt. See Attachment D of the Scoping Letter dated March 11, 2016		6/15/15	
Planning & Development Services (PDS) Land Development Comments					
1 - 1	General	The project submittal appears to be conceptual in nature. A more thourough review is anticipated with a more detailed plan submittal. Project Draft Condtions will be prepared with the more detailed project submittal.		6/15/15	
2 - 1	Plot Plan	Show location of any proposed LID features, post-construction BMPs, drainage devices, stormwater protection facilities, walls, cribbing, dams, or other protective devices to be constructed in connection with the proposed work.	Under review- Land Development Plot Plan comments will be forwarded separately	6/15/15	
2 - 2	Plot Plan	Provide clear phasing plans. It is unclear what work will be done on each phase and how the phases are separated.		6/15/15	

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Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
2 - 3	Plot Plan	Please provide drainage terraces for all the cut and fill slopes that exceeding forty feet (40') in vertical height to comply with section 87.402 of the Grading Ordinance, and SD County Design Standard Drawing DS-10. Alternatively, a geotechnical engineer can provide a recomendation for the slopes.		6/15/15	
2 - 4	Plot Plan	The Haul Road shown on the plan appears to be extremely steep in places. Please consider how vehicles will move around the site after excavation has commenced.		6/15/15	
3 - 1	CEQA Drainage Study	Provide a CEQA Preliminary Drainage Study for review.	Under review- Land Development Drainage study comments will be forwarded separately	6/15/15	
3 - 2	CEQA Drainage Study	In the narrative of the report please provide a summary table of: ***pre- and post-*** development H, L, C, Tc, I, A, and Q for each area (or point) where drainage discharges from the project. Peak runoff rates (cfs), velocities (fps) and identification of all erosive velocities (at all points of discharge) calculations for pre-development and post-development. The comparisons should be made about the same discharge points for each drainage basin affecting the site and adjacent properties.		6/15/15	
3 - 3	CEQA Drainage Study	Page 3-Conclusion: Please include the follow discussion Discuss whether or not the proposed project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? Provide reasons and mitigations proposed.		6/15/15	
3 - 4	CEQA Drainage Study	Discuss whether or not the proposed project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? Provide reasons and mitigations proposed.		6/15/15	
3 - 5	CEQA Drainage Study	Discuss whether or not the proposed project would create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems? Provide reasons and mitigations proposed.		6/15/15	

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Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
3 - 6	CEQA Drainage Study	Discuss whether or not the proposed project would place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps? Provide reasons and mitigations proposed.		6/15/15	
3 - 7	CEQA Drainage Study	Flood Control- Analysis is required to analyze the pre- and post-conditions of each of the phases of mining, and to demonstrate that there would not be a rise due to work in the floodway at any time during the project.		6/15/15	
3 - 8	CEQA Drainage Study	Flood Control - A Conditional Letter of Map Revision (CLOMR) would be required prior to excavating the site and a Letter of Map Revision (LOMR) would be required prior to final sign-off of site reclamation.		6/15/15	
3 - 9	CEQA Drainage Study	Flood Control- Please contact Anthony Barry (858-694-2707) in Flood Control if you have any questions regarding the scope of analysis regarding calculations necessary for the floodway.		6/15/15	
4 - 1	Sight Distance	Provide information to demonstrate that adequate sight distances along El Monte Road from the proposed project access points are achievable per Section 6.1.E, Table 5 of the County Public Road Standards (approved March 2012).	Under review- Land Development Sight Distance Study comments well be forwarded separately	6/15/15	
5 - 1	TIA	LLG TIA dated June 6, 2015; September 14, 2015	Information Only	7/20/2015	7/20/2015 9/17/2015
5 - 2	TIA	The TIA should include a conceptual figure for the intersection improvements at Lake Jennings Park Road and El Monte Road.	Complete	7/20/2015	10/2/2015
5 - 3	TIA	The TIA should address the adequacy of the existing Lake Jennings Park Road/El Monte Road intersection geometrics to accommodate large trucks/heavy vehicles turning at the intersection. Truck turning templates should be provided for review.	Complete	7/20/2015 10/2/2015	3/29/2016
5 - 4	TIA	The TIA refers to the future improvement (by restriping) to 4 lanes of Lake Jennings Park Road at the I-8 on/off ramps. The proposed restriping should be consistent with these proposals and be striped to 4 lanes with bike lanes as direct impact mitigation.	Complete	7/20/2015	10/2/2015

ATTACHMENT A
PROJECT ISSUE CHECKLIST

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
5 - 5	TIA	The TIA should explain how it was determined that 231 heavy vehicles would be accessing the project site for a typical construction day. The explanation should address construction duration, truck load capacities, and amount of materials to excavated.	Complete	7/20/2015 10/2/0215	3/29/2016
5 - 6	TIA	The TIA should identify the potential range of daily heavy vehicles and explain the causes for the fluctuation in heavy vehicle trips (seasonal variation?)	Complete	720/2015 10/2/02015	3/29/2016
5 - 7	TIA	The consultant should verify the LOS conclusions for the Lake Jennings Park Road/Olde Highway 80/I-8 EB off-ramp intersection (#10). The consultant should confirm that the existing LOS conditions reflect the WB approach right turn yield and no WB through movements.	Complete	7/20/2015 10/2/0215	3/29/2016
5 - 8	TIA	The TIA should provide the synchro files and appendices of the main study.	Complete	7/20/2015	10/2/2015
5 - 9	TIA	Figure 2 (Appendix I) should include/consider wider lanes (or travel lanes and bike lanes) at El Monte Road (SB) and Julian Ave (NB)	2nd Request	10/2/2015 3/29/2016	
5 - 10	TIA	Figure 2 should identify if all portions of the proposed raised medians and curb ramps/returns are to be improved concrete.	2nd Request	10/2/2015 3/29/2016	
5 - 11	TIA	Figure 2 should identify the material and nature of the green medians on Lake Jennings Park Road.	2nd Request	10/2/2015 3/29/2016	
5 - 12	TIA	Figure 3 (Appendix I) should include truck turning template for NB Julian Ave to EB and WB Lake Jennings Park Road (as seen in Figure 1).	2nd Request	10/2/2015 3/29/2016	
5 - 13	TIA	The LLG traffic consultant is advised to make sure that the existing traffic count and LOS data in the El Monte Sand Mining TIA are consistent with the same information contained in the LLG Greenhills Ranch TIA which is also currently being reviewed by County staff.		3/29/2016	
5 - 14	TIA	The TIA should explain how the project adds 30+ vehicles to the LOS F Lake Jennings Park Road/I-8 EB intersection and does not result in a direct impact, where the Greenhills Ranch sends about half the traffic and results in a greater amount of delay (possible impact). The TIA should clarify the analysis methodology used to determine impacts at the Caltrans ramps.		3/29/2016	
5 - 15	TIA	The TIA should provide the signal warrant analysis for the proposed signal at Lake Jennings Park Road/El Monte/Julian Ave.		3/29/2016	

ATTACHMENT A
PROJECT ISSUE CHECKLIST

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
5 - 16	TIA	There is concern with the proposed stop controlled rights next to the proposed signalized intersection. With the signal warrants, a preliminary roundabout evaluation should be conducted as mitigation for the project impacts to the Lake Jennings Park Road/El Monte/Julian Ave intersection.		3/29/2016	
6- 1	SWMP	The project is subject to the WPO and will require compliance because it is a requirement to have BMPs through the Industrial Storm Water Permit (CAS 000001). The County will inspect the project for compliance under the Industrial Permit as required by the WPO. Projects such as this one are covered under the Statewide Industrial Storm Water Permit. A requirement under that permit is for the project to have a Storm Water Pollution Prevention Plan (SWPPP) for its activities including any expansion of the operation. A copy of the SWPPP or a copy of the Notice of Intent to prepare a SWPPP should be included with the Reclamation Plan. Please provide this with your revised Reclamation Plan document.		6/15/15	
7- 1	Project Description - Trails	The project is located within the Lakeside Community Planning area that has an adopted trails and pathways plan identified in the Community Trails Master Plan and, as such, the applicant shall be required to provide trail dedications (easements) with improvements as a condition of approval of the project.	2nd Request	6/15/2015 3/29/2016	
7- 2	Project Description - Trails	Trail easement dimensions and locations shall be shown on all maps as well as improvement/grading plans. Trails shall be in conformance with and constructed and improved to the Coummunity Trails Master Plan Trails and Pathways Design and Construction Guidelines. All improvements shall be to the satisfaction of the County of San Diego, Director of Public Works and Director of Parks and Recreation.	2nd Request	6/15/2015 3/29/2016	

ATTACHMENT A
PROJECT ISSUE CHECKLIST

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
7- 3	Project Description - Trails	The project descriptions includes 2 of it's 7 goals as creation of recreational trails, which is accurate as the site has several existing and planned recreational trails within the project boundary. These trails include the Ashwood Street Pathway, El Monte Valley River Trail, San Diego River Park Regional Trail, Willow Road Pathway, El Monte Willow Connection Trail, El Monte Road Pathway, Power Pole Trail, Dairy Road Trail and Willow Road Extension Trail.	2nd Request	6/15/2015 3/29/2016	
7- 4	Project Description - Trails	The trail easements and alignments plotted on Figure 2.4-1 (Sheet 2, 3 & 4) are only of a limited area of the proejct boundaries and related to the mining operation. The project descriptionshould conform to the trail alignments, crossings and connection needs and typology of the CTMP as related to all project parcels and not just the mining location. Staff is available to provide direction.	2nd Request	6/15/2015 3/29/2016	
7- 5	Project Description - Trails	For clarity, the applicant should provide a single sheet trail plan for the project to include: All project "trails" existing or proposed, any "access roads" allowing trail use, any "access roads" not allowing trail use, public access points (trail heads), any use of adjacent public road rights of way (Willow Road or El Monte Road) to be used as trail/pathway connections.	2nd Request	6/15/2015 3/29/2016	

ATTACHMENT B
MEMORANDUM(S) OF UNDERSTANDING

CONSULTANT LIST & MEMORANDUM OF UNDERSTANDING (MOU)

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

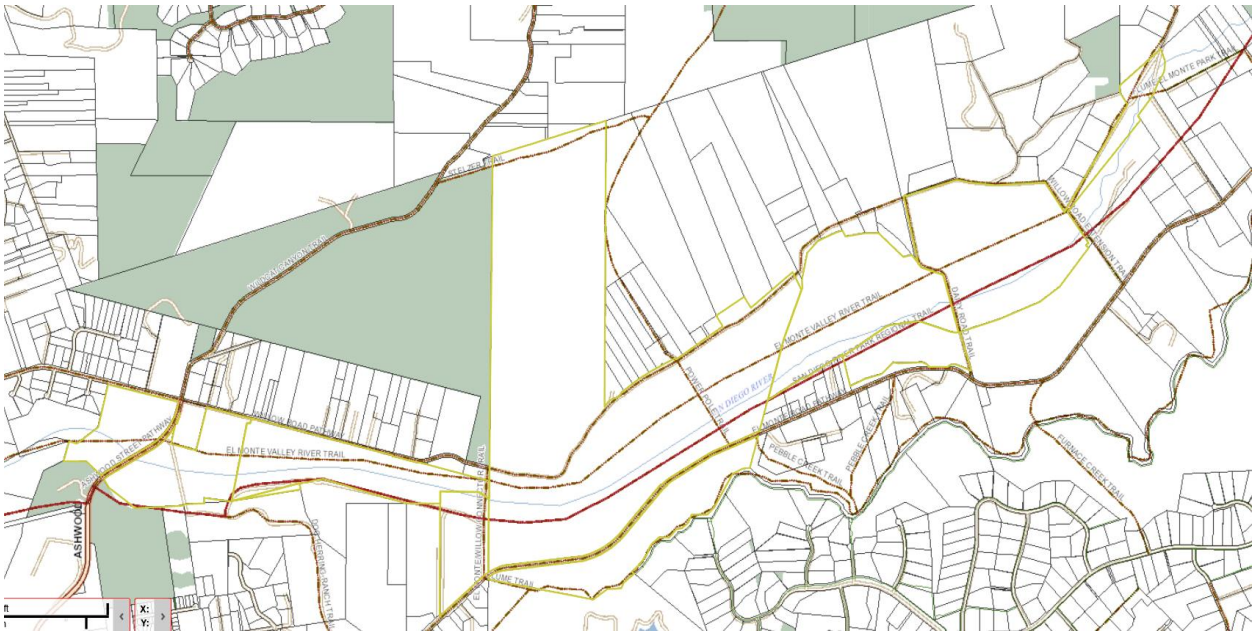
Applicants are responsible for selecting and direct contracting with specific consultants from the County's list to prepare CEQA documents for private projects. Prior to the first submittal of a CEQA document prepared by a listed consultant for a private project, the applicant, consultant, consultant's firm (if applicable) and County shall execute the attached Memorandum(s) of Understanding (MOU). The responsibilities of all parties involved in the preparation of environmental documents for the County (i.e. applicant, individual CEQA consultants/sub-consultants, consulting/sub-consultant firms, and County) are clearly established in the MOU for each requested applicable study. The clear identification of roles and responsibilities for all parties is intended to contribute to improved environmental document quality. The MOU can be found on the Department's website at: http://www.co.san-diego.ca.us/PDS/procguid.html (item number 12 under "General Guidance") and can be downloaded in word format at http://sdcounty.ca.gov/luegdocs/Templates/Boilerplate%20Templates/MOU.doc.

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

- Archaeological Resources
- Groundwater
- EIR Preparer
- Visual Analysis
- GHG (unless report is prepared by Air Quality consultant)

ATTACHMENT C
TRAILS

Additional information related to Trails comments:



Reveg plan trail reference:

3.5.1.2 Proposed Uses of Mitigation Site and Adjacent Areas

Upon completion of project implementation and site revegetation, the proposed uses for the mitigation site are protected open space for conservation of biological resources and recreational use. Recreational use will be confined to trails that will be established on the northern and southern perimeter of the site after the revegetation is complete. These trails, which will be placed in the upland setback area between the project boundary and the impact boundary near Willow Road on the north side and El Monte Road on the south side, will allow use by hikers and equestrians. No trails will be placed within the excavated basin. Land use of adjacent areas is not expected to change.

Reclamation plan:

Introduction

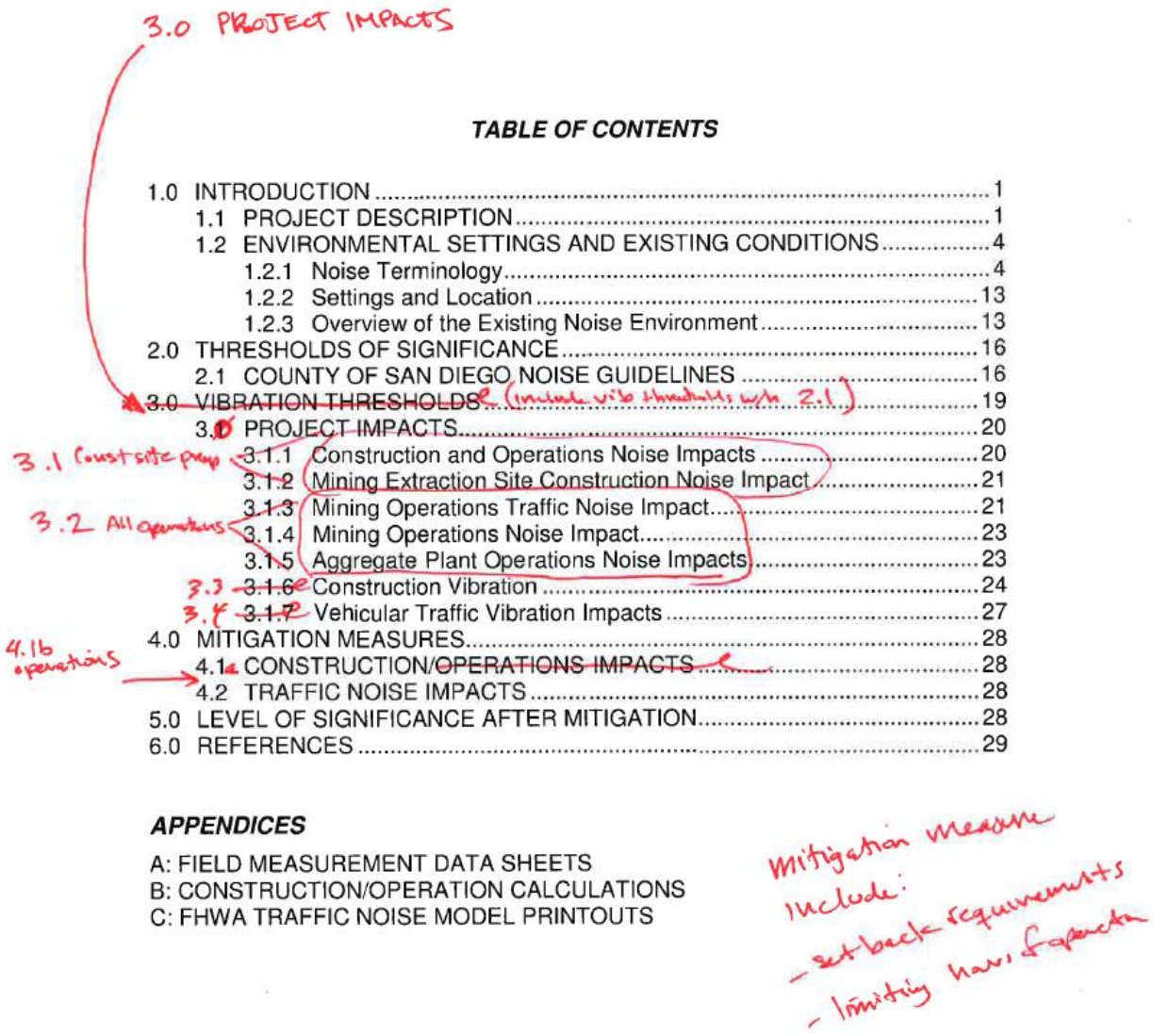
El Monte Nature Preserve, L.L.C. (Proponent) is currently proposing the El Monte Sand Extraction and Nature Project. The proponent is applying for a Major Use Permit (MUP) and Reclamation Plan (RP). Approval of the MUP and RP would allow for the extraction of approximately 6.9 million cubic yards (10.3 million tons) of construction aggregate over a 12 year period, followed by 4 years of reclamation activities. This RP area is located in El Monte Valley on land that is zoned for extractive use. As mining is completed in phases, the site will be restored to open space with recreational trail easements as the end use of the property. The RP and MUP boundaries will occupy a 489.3 acre area, which is currently owned by Helix Water District. Extraction and reclamation activities will impact approximately 236 acres of the 489.3 acre area. The remaining area will be used as buffer zones.

Reclamation of the project will be continuous and phased with mining. Successful reclamation will return the site to a beneficial end use of open space with recreational trail easements.

A temporary trail system will be established within the setback areas north and south of the area to be disturbed by the operation. A permanent trail system will be installed after extraction is complete. The temporary trail system along El Monte Road will be closed to recreationists during the work week and only open for use on weekends. The trail segment along Willow Road will be accessible to recreationists during those time periods. A four-strand, barbed wire fence and an earthen berm will separate the temporary trails from the operation.

ATTACHMENT D
NOISE REPORT

Additional information related to Noise comments:



3.0 PROJECT IMPACTS

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APPENDICES

Mitigation measure include:
- setback requirements
- limiting haul operation

ATTACHMENT E
VALLEY FEVER REPORT

See comments in attached document.

El Monte Sand Mining and Nature Preserve Project

Valley Fever Technical Report

Project # PDS2015-MUP-98-014W2/PDS2015-RP-15-001;
Record ID #: PDS2015-MUP-98-014W2; PDS2014-RP-15-001;
Environmental Log #: PDS2015-ER-98-14-016B

Comment [r1]: Don't believe this accurately describes the current project, please revise here and throughout the report, including footers and figures.

Prepared for:

County of San Diego Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

March 2016

Document Preparer:
Victoria Evans
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550 Kearny Street, Suite 800
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2600 Capital Avenue, Suite 200
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Project Proponent:
El Monte Nature Preserve, LLC
1335 San Lucas Court
Solana Beach, CA 92075

El Monte Sand Mining and Nature Preserve Project

Draft Valley Fever Technical Report

Project # PDS2015-MUP-98-014W2/PDS2015-RP-15-001;
Record ID #: PDS2015-MUP-98-014W2; PDS2014-RP-15-001;
Environmental Log #: PDS2015-ER-98-14-016B

Comment [r2]: Don't believe this accurately describes the current project, please revise here and throughout the report, including footers and figures.

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140957

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El Monte Sand Mining and Nature Preserve Project
Draft Valley Fever Technical Report

Comment [r3]: Don't believe this accurately describes the current project, please revise here and throughout the report, including footers and figures.

El Monte Sand Mining and Nature Preserve Project

Draft Valley Fever Technical Report

1. Introduction

The El Monte Sand Mining and Nature Preserve Project (project) is proposed by the El Monte Nature Preserve, L.L.C. (Proponent) to extract 10.3-million tons of mineral resources within the El Monte Valley. The ~~16~~sixteen-year project would combine mineral extraction (twelve years) and reclamation (additional four years) over approximately 230 acres of a~~n approximately~~ 489-acre site. The site is currently owned by the Helix Water District and is zoned for extractive use (S82). After the completion of mining the project site would be reclaimed and restored for an end use of undeveloped open space with an open water pond and recreational trails.

Comment [r4]: Don't believe this accurately describes the current project, please revise here and throughout the report, including footers and figures.

Comment [r5]: Don't believe this accurately describes the current project, please revise)

1.1 Purpose of the Report

This technical report has been prepared to support the Proponent's environmental review process and provide information regarding potential public health hazards related to Valley Fever. This report presents relevant background information regarding Valley Fever, describes potential impacts associated with the project that could result in the exposure of onsite mining workers and nearby residen~~tee~~s to potential health hazards, and identifies appropriate mitigation measures.

1.2 Project Location and Description

The site is situated in the El Monte Valley within the San Diego River watershed and in the floodplain of the San Diego River. ~~The San Diego River flows through the central part of the properties. The project is parallel to both El Monte and Willow Roads in Lakeside, CA.~~ The project site is located approximately 1.5 miles east of where the San Diego River is crossed by Highway 67 and is 4.8 miles west of the El Capitan Reservoir dam. The San Diego River channel (dry) runs through the central part of the project site, which lies between El Monte and Willow Roads in Lakeside, CA. **Figure 1** and **Figure 2** show the regional location and the area affected by the project, respectively.

Access to the project site is located 0.5 miles northeast of the intersection of El Monte Road and Lake Jennings Project Road. Project traffic would use El Monte Road which is also the primary route to the Van Ommering Dairy Farm, El Monte County Park, and El Capitan Reservoir. Residential properties located within the project vicinity use both El Monte and Willow Roads to access their properties.

Figure 1 Regional Location

Figure 2 El Monte Sand Mining and Nature Preserve Area Affected by the Project

As stated previously, the project would extract 10.3 million tons (6.9 million cubic yards) of mineral resources, then reclaim and restore the site for open space/recreational use. The mining process would be completed in four phases over a 12-year period. As mining is completed in phases, the disturbed areas previously mined would be progressively reclaimed starting in year four of the project. Reclaimed areas would be restored to an end use of undeveloped open space and recreational trail easements. Reclamation is anticipated to extend four years past the end of mining, giving the project a total lifetime of 16 years.

Comment [r6]: Please ensure this accurately reflects the current project description.

Activities associated with the project include an aggregate processing facility, a portable processing wash plant, storage container, weight scales, and modular scale house. The project would have a Reclamation Plan boundary of 489 acres which includes the disturbed areas, the previously excavated areas intended for use as golf course ponds, the 100 setback from El Monte Road and Willow Road and a 300 foot setback from the eastern parcel line of APN 391-071-04 and Dairy Road. The project would eliminate the approved golf course use and would include the backfill of the ~~onsite pond~~previously excavated area east of the private road leading to the Van Ommering Dairy Farm. The footprint of the project and areas of disturbance are shown in Figure 2. **Figure 3** shows the site plan and phasing.

The project is estimated to extract ~~approximately~~ a maximum of 1.1 million tons (733,000 cubic yards) annually. This level would be reached approximately two years into active site operations. The project is anticipated to ~~ship~~ produce ~~a minimum of~~ 10.3 million tons (6.9 million cubic yards) over the lifetime of the project. There are currently no plans to have need of or operate a batch plant or rock crushing facilities and the mining operations would not require blasting activities.

Comment [r7]: Please verify this accurately reflects the current project description.

2. Valley Fever Background

Valley Fever is an illness caused by the *Coccidioides* fungus that usually affects the lungs. The fungus grows in areas of low rainfall, high summer temperatures, and moderate winter temperatures. ~~This makes~~ Tthe ~~dry dirt and desert-like weather~~climatic conditions and dry soils found in the El Monte Valley make it fairly ideal for *Coccidioides* fungus spore growth. The fungal spores are generally found in the upper 30 centimeters of the soil horizon, especially in virgin, undisturbed soils. The spores become airborne when uncultivated soil is disturbed by winds, construction, farming, and other recreational activities such as riding ATVs and horseback riding. Areas that are ecologically more likely to support *Coccidioides* are areas with rodent burrows, old (prehistoric) Indian campsites near fire pits, areas with sparse vegetation and alkaline soils, areas with high salinity soils, areas adjacent to arroyos, packrat middens, ~~upper 30 cm of the soil horizon, especially in virgin undisturbed, and~~ silty soils, and well aerated soils with relatively high water holding capacities. Ecological areas less likely to support *Coccidioides* include cultivated fields, heavily vegetated areas, higher elevations (above 7,000 feet), areas where commercial fertilizers have been applied, areas that are continually wet, paved or oiled areas, soils containing abundant microorganisms, and heavily urbanized areas where there is little undisturbed virgin soil (USGS, 2000).

Figure 3 Site Plan and Phasing

2.1 Life Cycles of *Coccidioides* spores

The life cycle of the Coccidioides spore ~~are~~ is linked with the changes in local climate conditions. The Coccidioides spores start their lives within fungus beneath the soil and begin to grow after being in contact with water usually during the spring months after ~~the heavy~~ winter rain fall has ended (Brown, 2013). During the d~~t~~ry months the hyphae of the fungus begins to desiccate and maturate into arthroconidia, which can be become air~~-~~borne and inhaled by people. Once arthroconidia is inhaled and settle into the lungs, the arthroconidia spherules begin to divide internally until they are filled with endospores. Once the spherules rupture, the endospores are released and disseminated within the surrounding tissue. Over time, the endospores that were ruptured by their host spherules redevelop into new spherules; thus repeating the cycle (CDC, 2015). **Figure 4** illustrates the life cycle of *Coccidoides*.

2.2 Symptoms of Valley Fever

An estimated 150,000 *Coccidioides* infections occur each year in the United States, although more than half of these infections do not produce any symptoms (CDPH, 2015). In susceptible people and animals, infection occurs when a spore is inhaled. ~~People working in occupations such as construction, agriculture, and archaeology have an increased risk of exposure and disease because these jobs result in disturbance of soils where fungal spores may be found (CDPH, 2013).~~

~~In a~~Approximately 40 percent~~%~~ of cases persons exposed to Valley Fever usually show symptoms within one to three weeks (CDC, 2014a). Symptoms of Valley Fever include fatigue, cough, dyspnea, headache, night sweats, myalgias, and rashes. In approximately ~~5 to 10~~five to ten percent~~%~~ of cases, people exposed to Valley Fever can develop complications or chronic pulmonary diseases. Other disease, such as disseminated disease can occur in an estimated ~~1%~~one percent of cases, ~~which have been~~and are usually observed ~~to be higher~~ in certain risk groups. People working in occupations such as construction, agriculture, and archaeology have an increased risk of exposure and disease because these jobs result in disturbance of soils where fungal spores may be found (CDPH, 2013). Bones/joints, soft tissues and meninges are most commonly affected by dissemination disease (CDC, 2014a).

The highest risk groups ~~to~~ for exposure to Valley Fever are those who work and/or live in dry ~~dirt~~ soil and desert-like weather conditions that exposes them to fugitive dust. Increased r~~R~~isk factors for severe or disseminated coccidioidomycosis include those of African-American ~~race~~ or Filipino ~~ethnicity~~descent, HIV/AIDS, use of immunosuppressive medications, organ transplant, diabetes mellitus, or pregnancy (CDC, 2014a).

2.3 Treatment of Valley Fever

Most Valley Fever cases are very mild, and approximately 60% percent of infected people have no symptoms, which makes it very difficult to ~~treat~~detect. In most cases, people infected with Valley Fever will fight off the infection without any antifungal treatment (CDC, 2014a). When people do show symptoms of Valley Fever, the most popular first-line therapy are oral azoles.

which are systemic antifungal therapies. Although, the only approved treatment approved by the Food and Drug Administration (FDA) is ketoconazole.

Figure 4 Life Cycles of Coccidioides spores

2.4 Cases of Valley Fever

Because most Valley Fever cases are very mild, and approximately 60~~%~~ percent of infected people have no symptoms.~~-~~ T~~t~~hose who have symptoms experience flu-like symptoms and never seek medical attention. This results in most cases of Valley Fever going unreported. There is currently no vaccine, although efforts to develop a vaccine are ongoing. Valley Fever is not contagious from person to person and it appears that after one exposure the body will develop immunity. In about ~~1%~~one percent of those infected, *Coccidioides* disseminates elsewhere in the body beyond the pulmonary system, with more serious, and in limited cases fatal, results (USGS, 2000).

Valley Fever has been reported in most counties in California with approximately 74 percent~~%~~ of the cases occurring within six counties including Kern, Fresno, San Luis Obispo, Tulare, and Madera Counties. The reported number of cases in California was 16,108 between 2009 and 2012 with annual incidences peaking in 2011. In San Diego County between 2008 and 2012 between 1 and 23 cases per 100,000 people were reported (CDC, 2014b).

The County of San Diego, Health and Human Service Agency (HHSA), prepared case counts and rates of exposure of coccidioidomycosis disease (Valley Fever) between years 2005 and 2014 for residences within zip codes 92040, 92021, and HHSA Southern Region and San Diego County, which can be found in Table 1. The number of cases and rate of exposure of Valley Fever within zip codes 92040 and 92021 are representative of people residing north and south of the project area and are not representative of the location of exposure. Since Valley Fever is a regional disease, people residing within zip codes 92040 and 92021could be exposed to Valley Fever outside of these zip codes and not shown any symptoms until returning home.

As shown in Table 1, between years 2005 and 2014 there have been 20 cases of Valley Fever in zip code 92040 (north of the project site) and 21 cases in zip code 92021 (south of the project site). Also shown in Table 1, the current rate of exposure to Valley Fever per 100,000 people is 4.9 within zip code 92040 and 3.3 within zip code 92021. The total number of cases near the project site are significantly below the HHSA South Region and San Diego estimates as shown in Table 1. However, the rate of exposure of Valley Fever to residences located near the project area are higher than the total exposure rate within San Diego County of 3.9 per 100,000 people, but lower than the total exposure rate within HHSA South Region of 8.7 per 100,000 people. Based on information in Table 1 and that most cases Valley Fever go unreported, people residing within the El Monte Valley would have likely been exposed to Valley Fever within their life time.

Comment [r8]: Please provide a description or map of the HHSA Southern Region.

Comment [r9]: This needs to be verified with HHSA staff.

TABLE 1
VALLEY FEVER CASE COUNTS AND RATES
SAN DIEGO COUNTY RESIDENCES – 2005 TO 2014

Locations	Number of Cases	Rate per 100,000 population
Zip Code 92040	20	4.9
Zip Code 92021	21	3.3
HHSA South Region	407	8.7
San Diego County	1,187	3.9

1. Cases included are San Diego County residents with onset date in disease years 2000-2013. When onset date is unavailable (as it is for 63% of these cases), the earliest of diagnosis date, specimen collection date, death date, date received is used.
2. Includes both acute and chronic cases.
3 Location is location of residence when the case was reported to the County of San Diego Health and Human Services Agency, which may not be location of exposure.
4. A revision to the surveillance case definition for Coccidioidomycosis was adopted by California in June 2007; a single positive IgG result (in place of a rising IgG titer) became sufficient to meet laboratory criteria. National case definition changes occurred in 2008 and 2011.
5. Data are subject to change as cases are reviewed or new information becomes available.

SOURCE: U.S. Census Bureau, Census 2010; SANDAG Population Estimates (2012 and 2015 Updates; County of San Diego Communicable Disease Registry

PREPARED BY: County of San Diego, Health and Human Service Agency, Public Health Services, Epidemiology and Immunization Services Branch, July 16, 2015.

3. Existing Conditions

3.1 Existing Setting

The project is set within the El Monte Valley, approximately 2 miles east of Lakeside. The project site is set in a fairly flat alluvial valley with mountains to the north and south. A ~~river~~ dry channel of the San Diego River ~~flows~~ runs down the center portion of the site. The western portion is relatively flat while the eastern portion was previously graded with a rolling topography and excavations for ponds. Across the site elevation ranges from 408 feet above mean sea level (AMSL) to 505 feet AMSL. The project site is currently vacant with existing vegetation composed of primarily exotic species and some native vegetation.

Previous uses of the property were predominately agricultural. In years past, commercial farms leased some of the land within the project area to produce hay crops and bamboo for animal feed. Thirty five years ago sand mining operations also occurred on-site. Most recently a Major Use Permit P98-014 was approved by the Planning Commission for the El Capitan Golf Course on approximately 465 acres in February of 2000. Site grading was started however it was discontinued due to existing market demand. Initial site grading included the establishment of a number of surface depressions intended as water hazards/storage ponds.

~~A project was proposed subsequent to the discontinuation of the golf course development that would have imported treated waste water for percolation into the groundwater for domestic use, however due to cost and lack of demand the project was discontinued.~~

Within the project vicinity there is a variety of existing land uses. These include rural residential, dairy farming, extractive, field and orchard crops and open space. Land use in the project vicinity is limited by the presence of the San Diego River floodway which passes through the site. Immediately north and south of the project site are existing rural residences. These sensitive land uses have the potential to be exposed to fugitive dust emissions that may contain *Coccidioides* spores during construction and operation of the project.

Comment [r10]: Please describe where in the project vicinity this is occurring. If this refers to the Hwy 67/Vigilante Road area, let's describe that as outside the project vicinity by providing more specific locational information.

4. Potential Impacts

There is currently no established significance threshold for the potential exposure of workers and nearby receptors to *Coccidioides* spores. Therefore, for the purposes of this analysis, significance is determined by the potential to significantly increase exposure of workers and nearby residents.

As previously mentioned, the project area was once used for sand mining and agriculture and is currently being used by the public for recreational activities such as off-road vehicle uses (e.g., ATVs, dirt bikes) hiking and horseback riding. ~~Since the project area was once used specifically for the growth of crops, there is the possibility that the soil may still contain some pesticides that would decrease the growth of *Coccidioides* spores within the project area.~~ ~~Additionally, most of the top soil within the project area would have already been disturbed by existing recreational activities prior to project construction and operations. The existing public use of the project area could have already resulted in large quantities of *Coccidioides* spores to become airborne in the area, if spores are present in onsite soils.~~ It is ~~likely~~ quite possible that the local residential receptors near the project area have already been exposed to Valley Fever simply by living in the region. Therefore, the project related exposure of nearby residential receptors to Valley Fever during project construction and operations would not be greater than the existing exposure and would be considered a less-than-significant impact.

Comment [r11]: How prevalent is this, what is the source of information?

Comment [r12]: Please verify if this is accurate.

Comment [r13]: This does not appear to be consistent with the Phase I ESA.

Comment [r14]: This seems quite speculative.

Comment [r15]: This does not at all seem to account for the great deal of soil disturbance that will result from project. This will require further discussion with HHSA staff and a determination on appropriate CEQA processing.

It is assumed that not all of workers, required to construct and operate the sand mine, would originate from areas containing *Coccidioides* spores. These workers may not have been exposed to *Coccidioides* spores and therefore may not be immune to Valley Fever prior to working within the El Monte Valley. Therefore, workers within the project area could potentially be at risk of being infected with Valley Fever. However due to the nature of Valley Fever infection, and the already disturbed nature of the project site, this would be considered a negligible impact.

Comment [r16]: Not seeing how the previous sentences lead to this conclusion. This will require further discussion with HHSA staff and a determination on appropriate CEQA processing.

5. Mitigation Measures and Design Considerations

While the risk of infection from onsite activities is less than significant, the project would implement additional design considerations to further reduce potential exposure from onsite activities. Since onsite workers would be more at risk of being infected with Valley Fever than local residents who probably have already have been exposed to Valley Fever, the following design consideration would be implemented to provide additional protection onsite workers.

Implementation of the following design considerations would reduce the exposure of onsite mine workers to *Coccidioides* spores:

Design Considerations

DC-1: As required by the SDAPCD Rule 55, the following measures shall be incorporated to reduce emissions of fugitive dust that may contain *Coccidioides* spores:

- All haul trucks leaving the site with aggregate shall maintain at least 2 feet of freeboard or securely cover the loads.
- Grading ordinance dust control measures shall be enhanced and watering shall be conducted 3x per day for all active construction areas and on unpaved roads. Water shall be applied using water trucks and shall be sufficient to confine dust plumes to the immediate work area.
- Mining activities shall be suspended when winds exceed 25 mph.
- Sweepers and water trucks shall be used to control dust at public street access points. Paved streets shall be swept at least once per day when evidence of track-out is present.
- Vehicle speeds on unpaved roadways shall not exceed 15 mph.
- ~~Inactive disturbed areas shall be revegetated as soon as possible to prevent soil erosion.~~
- Chemical stabilizers shall be applied to all disturbed surfaces left inactive for four or more days.

DC-2: Water sprayers shall be used at transfer points as necessary to control dust from aggregate washing/separation activities.

~~**DC-3**: Where feasible the Proponent shall hire workers from the local area, or areas endemic to Valley Fever. Those living in areas endemic to Valley Fever have the potential to have already been exposed to Valley Fever spores and therefore would have built up antibodies to the potential infection, thus rendering them immune to infection from potential exposure at the site. Most individuals that are exposed to Valley Fever never show signs of infection or, if they do, infection symptoms mirror that of the flu and therefore the individual is not aware of having been infected.~~

DC-4: Where feasible the Proponent shall use machinery with enclosed cabs and utilize air conditioning.

DC-5: The Proponent shall provide dust masks for use by onsite workers. Dust masks shall be capable of filtering particles of 0.4 microns or smaller.

Comment [r17]: Not likely consistent with the Reclamation Plan.

Comment [r18]: This appears to be straight compliance with grading ordinance requirements which does not constitute a DC.

Comment [r19]: Don't believe this would qualify as a mitigation measure if required.

Comment [r20]: Please explain why this specification is used.

Comment [r21]: This section will be revisited following further coordination and discussion with HHSA staff and determination on appropriate CEQA processing.

6. Conclusion

Due to the existing recreational activities within the project area, such as the use of recreational off-road vehicles and horseback riding, it is likely that if *Coccidioides* spores exist in onsite soils, local residences would have already been exposed and if they were to be infected, would have already been so. Therefore, residences located near the project area would likely be immune to Valley Fever and would not be affected by onsite soil disturbance from the proposed project. However, onsite works may not have already been exposed to *Coccidioides* spores, making the risk of these works being infected with Valley Fever higher than the local residents. With the implementation of the design considerations, exposure to *Coccidioides* spores would be reduced for offsite residents as well as onsite and offsite workers. Despite the increased soil disturbance and the relatively low potential for onsite activities to newly expose nearby receptors, the design considerations measures would further reduce any potential for exposure than if the site was left vacant and natural wind erosion disturbed the topsoil. Therefore, construction and operational fugitive dust emissions associated with the project would remain less than significant with exposure of workers and offsite residents to Valley Fever.

Comment [r22]: The conclusion will be revisited following discussions with HHSA staff and a determination on CEQA processing.

7. References

Brown, J., Benedict, K., Park, B. J., & Thompson, G. R. 2013. Coccidioidomycosis: epidemiology. *Clinical Epidemiology*, *5*, 185–197. http://doi.org/10.2147/CLEP.S34434

Center for Infectious Diseases (CDC). 2014a. Information for Healthcare Professionals about Valley Fever (Coccidioidomycosis). Available: http://www.cdc.gov/fungal/diseases/coccidioidomycosis/health-professionals.html. Accessed October 3, 2015.

CDC. 2014b. *Epidemiologic Summary of Coccidioidomycosis in California, 2009 – 2012.* Available http://www.cdph.ca.gov/HealthInfo/discond/Pages/Coccidioidomycosis.aspx. Accessed June 2015.

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CDPH. 2013. *Valley Fever Fact Sheet.* Available: http://www.cdph.ca.gov/HealthInfo/discond/Pages/Coccidioidomycosis.aspx. Accessed June 2015.

EnviroMine Inc. 2015a. *Project Description for the El Monte Sand Mining and Nature Preserve Project, Lakeside, CA.* May.

United States Geological Survey (USGS). 2000. *Operational Guidelines (version 1.0) for Geological Fieldwork in Areas Endemic for Coccidioidomycosis (Valley Fever).*

8. List of Preparers and Persons and Organizations Contacted

Document Preparers:

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ATTACHMENT F
VECTOR MANAGEMENT PLAN

See comments in attached document

Vector Management Plan

for the

El Monte Nature Preserve & Restoration Project

PDS2015-MUP-98-014W2, PDS2014-RP-15-001

Comment [r1]: Please provide the accurate project name, consistent with all other reports.

Submitted To:

County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123

Prepared For:

El Monte Nature Preserve, LLC
1335 San Lucas Court
Solana Beach, CA 92075

Prepared By:

EnviroMINE Inc.
3511 Camino Del Rio South, Suite 403
San Diego, CA 92108
619-284-8515, Fax 619-284-0115

~~October~~January 201~~5~~6

El Monte Nature Preserve Mine& Restoration Project
Vector Management Plan - Januaryuly 20156

1.0 Introduction

This Vector Control Plan has been created in consultation with the San Diego County Department of Environmental Health, Vector Control Program (DEH-VCP). Implementation of this plan will insure the minimization of vectors, such as rodents, flies and mosquitoes that may breed in standing water. This plan is created to meet the vector control requirements for the El Monte Nature Preserve Project.

The goals of this Vector Management Plan are to:

1. Protect public health
2. Control and reduce public exposure to vectors and human diseases
3. Reduce nuisance characteristics that are associated with vectors

1.1 Project Description

El Monte Nature Preserve, L.L.C. (Proponent) is proposing the El Monte Nature Preserve Miner and Reclamation Project (Project). This project will have two major components. The first is the extraction 150.53-million tons (106.9-million cubic yards) of surface mineral over a 152-year period in El Monte Valley on land that is zoned for extractive use. The second element is the reclamation of the site to open space as the end use which will include habitat creation/restoration and a recreational/equestrian trail network. The combined mineral extraction and reclamation project would be located in El Monte Valley on approximately 489 acres currently owned by Helix Water District. A vicinity map of the El Monte Valley and overall project is attached as Figure 1.

The project includes property within San Diego County Assessor Parcel Numbers:

392-150-17, 391-061-01, 391-071-04,393-011-01, 390-040-51, 392-060-29

The proposed MUP and Reclamation Plan area within these parcels totals approximately 489 acres.

~~The Reclamation Plan area would cover 260 acres within Assessor Parcel Numbers~~

~~392-150-17, 391-061-01, 392-060-029, 390-040-51, 391-071-04~~

Mineral extraction would occur on approximately 167230 acres. Reclamation will occur on thise extractionmined area and about 3215 acres of ananthe previously excavated area intended for use as olda golf course ponds, including roads.

Mineral extraction
The mineral extraction project will include the modification of existing Major Use Permit P98-015-014 and the approval of a Reclamation Plan by the County of San Diego for extraction of 15 million10.53-million tons of construction aggregate and

Comment [r2]: Same comment as above.

Comment [r3]: Same comment as above.

Comment [r4]: 10.3 million tons is consistent with other project documents. Please verify and make consistent with all other reports.

reclamation of the mined lands (i.e. the areas disturbed by mineral extraction activities). The requested MUP modification would authorize a maximum production limit of 1.~~5~~1 million tons in any

Figure 1.1-2 - El Monte Sand Mining & Nature Preserve Project Vicinity

calendar year. Total material production from the site is estimated to be 10.53-million tons (106.9-million cubic yards). Phased mineral extraction would occur over an approximate 167215-acre area with an average depth of excavation of 930 feet and approximately 10 feet above the existing water table.

Operations are expected to begin in July 2017. At thea proposed average mineral exporttraction rate of one million863,000 tons (667575,000 cubic yards) per year, the export of 15-million10.53-million tons of material would require approximately 152 years. With one year of start up and four years to complete reclamation, the project life would total 196 years. Thus the proposed end of mine life is approximately JanuaryDecember 20373 assuming a startup date of July 20167.

Mineral extraction operations will consist of 4 phases to minimize surface disturbance and occur in anfrom east to west line within the central areas of the project site. Water will be provided by a public water utility and Groundwater would be used for material washing, dust control and, if necessary, irrigation of landscaping and reclaimed areas. A series of settling ponds located in the processing area will be used to recycle water and capture fine sediment removed from the sand during processing.

Reclamation/Restoration

Following cessation of mineral extraction activities in any given phase, the mine site would be reclaimed to a condition suitable for an alternate end use including restored riparian/upland vegetation and a recreational trail network. Reclamation of the site would occur in four phases such that the acreage under active excavation at any one time would be minimized. The final reclaimed surface would be characterized by a large pond(s)it and a re-contoured valley floor. Side slopes will have a maximum 3.0 to 3.5:1-Horizontal:Vertical (H:V) gradient. The pit floor will have a fairly flat surface that is gently sloped downward to the west. below the water table and will vary between 2:1 and 4:1 H:V above the water table. The mined lands will be planted with native riparian along the center of the reclaimed pit and upland vegetation on the side slopes. to be compatible with the surrounding area.

The pit will not be backfilled with imported material and a depression in the valley floor will remain. When water is released from the El Capitan Reservoir during flood events a pond will develop on the western end of the pit. This pond will be approximately 83 acres maximum in size immediately after the flooding but will recede over a 5 to 6 year period until groundwater levels drop to an elevation beneath the floor of the western end of the pit. Based on historical releases from the reservoir, this may occur on a 17 to 20 year cycle.

The current vegetation on site is comprised of mostly disturbed vegetation/agriculture, non-native grasslands, and invasive plant species (tamarisk) with small areas of coastal sage scrub/baccharis scrub, riparian scrub, and riparian/oak woodland. As each mineral extraction phase is completed, vegetation would be planted in the reclaimed areas after finish grading.

The mined lands would be planted with riparian and upland vegetation to be compatible with the surrounding area. Restoration will include approximately 110230 acres of riparian/wetland andvegetation, open water pond and 89 acres of upland

Comment [r5]: Why is this 215 acres instead of 230?

Comment [r6]: Please verify the accuracy of these statements and ensure they are consistent with the Groundwater or other reports that are being done for the project and reference the other report(s).

vegetation. Recreational features including hiking/riding trails and trail access points will be included adjacent to the reclaimed extraction areas.

Comment [r7]: These should be described consistent with the project description and accurately reflect the reclamation plan and plot plan.

1.2 Existing Conditions

The site is situated in the El Monte Valley within the San Diego River watershed and in the floodplain of the San Diego River. The project site is located approximately 1.5 miles east of where the San Diego River is crossed by Highway 67 and is 4.8 miles west of the El Capitan Reservoir dam.~~The site is situated in the upper San Diego River watershed, and is situated in the floodplain of the upper San Diego River which flows through the central part of the properties. It is located parallel to El Monte Road and Willow Road in Lakeside, CA; an unincorporated area of San Diego County. It is approximately 5.6 miles east, northeast of central portion of Santee, CA and 4.8 miles west, southwest of the El Capitan Reservoir dam.~~ The entrance to the project site is from El Monte Road, approximately 0.5 miles northeast of the intersection of El Monte Road and Lake Jennings Project Road.

This vector management plan is necessary to address collection of water within the proposed open pit, the processing plant settling ponds and any pond that may develop as a result of the release of water from the reservoir~~remaining as final reclamation~~ that may result in breeding grounds for vectors. At times, ~~W~~water may~~will~~ collect in the reclaimed pit from direct precipitation, runoff from the contributing watershed and groundwater inflow.

2.0 Vector Management

Vector sources occur where site conditions provide habitat suitable for breeding. These can include any source of standing water, including wetlands, irrigation ponds, detention basins and infiltration basins. A standard requirement for projects of this type is the incorporation of measures, or Best Management Practices (BMPs), to reduce the health risks and nuisance factors associated with the vectors which can result from the standing, stagnant water and water detention systems (County of San Diego 2007).

Water~~Runoff that~~ released from the El Capitan Reservoir would~~currently~~ flow~~s~~ through~~to~~ the San Diego River channel and ~~will~~ be retained in the pit ~~pond~~ after reclamation for approximately 6 years at which point the surface will dry out. Small sediment basins and other BMPs (fiber rolls, hydroseeding, etc.) will be used to control runoff and sediment. Therefore, water that collects in the pit, settling ponds and any detention basins will need to be monitored and managed to achieve proper vector management. This type of management is described in the conditions listed below. The project will also operate under an Industrial Storm Water Pollution Prevention Plan (SWPPP).

2.1 Management Practices

2.1.1 Mosquitoes

Extraction P~~ond~~it

Groundwater is ~~expected to be encountered~~currently located approximately 40 feet below the existing ground surface and will be approximately 10 feet below the bottom of the pit after excavation. ~~during the pit excavation and~~ A~~a~~ pond will develop if, and when, water is released from the El Capitan Reservoir during flood events. This retained water will dissipate over the course of 5 to 6 years as groundwater levels drop. Ponded water may also occur during periods of high intensity rain and local runoff events. However, ponding in these events will be short term due to high infiltration rates of the native material. ~~As extraction continues, the water surface of the pond will be routinely disturbed by the extraction process when material is removed by a dragline.~~ Extraction and reclamation will be an active, ongoing process which will preclude invasive or exotic vegetation, vegetation overgrowth and vandalism. Trash and debris collection and removal will occur continuously by the site personnel

Process Settling Ponds

The ~~process~~ settling ponds will be used to recycle water used in the screening and washing process and will be under constant circulation during operation. These ponds will be moved as the plant moves to the west in advance of the main pit. ~~These~~During operation, the ponds will be maintained by the routine removal of vegetation, sediment, trash and debris.

The operator will control mosquito breeding using BMPs in accordance with requirements of the San Diego County DEH. Following is a list of conditions to ensure that water collected in the pit pond, storm water detention basins and process settling ponds does not propagate the breeding of vectors.

Monitoring

The operator will implement an active management plan to control mosquitoes as described below:

1. As water is pumped to the processing plant area settling basins~~ponds~~ for use in material processing and dust control, excess water will be collected in the settling ponds and allowed to infiltrate or return to process cycle~~the open pit~~ after a short retention period. Therefore, this water will be constantly circulating and will help to prevent propagation of vectors.

2. During the wet season (October through March) the open pit, processing plant area ponds and any detention basins will be visually inspected monthly, by the operations staff, for the presence of vectors. If necessary, corrective measures will be initiated.

3. In the dry season (July through September) the open pit, processing plant area ponds and any detention basins will be visually inspected weekly, by the operations staff, for the presence of vectors.

Comment [r8]: Please verify the accuracy of these statements and ensure they are consistent with the Groundwater or other reports that are being done for the project and reference the other report(s).

Comment [r9]: Is this an accurate timeframe for the wet season? And is monthly often enough during the wet season?

Comment [r10]: Is this an accurate timeframe for the dry season? Where does April through June fit in? And is weekly the correct inspection interval?

Corrective Measures

If necessary, corrective measures described below will be initiated.

- The removal of emergent vegetation will occur when recommended by the DEH San Diego County, Vector Control Program or when emergent vegetation (e.g., cattails, sedges, etc.) is in excess of 50% of the surface area.

- Emergent vegetation will be controlled by hand labor, mechanical means or by frequent clear cutting. Herbicides may be used as needed to control re-growth.

- Vegetation clearing is intended to prevent habitat for mosquito larvae and refuge from predation by predatory fish, if present.

- Removal of the vegetation by hand will be the preferred method in order to lessen the re-growth frequency and density.

- Eliminate floating vegetation conducive to mosquito production (i.e., water hyacinth [*Eichhornia* spp.], duckweed [*Lemna* and *Spirodela* spp.], and filamentous algal mats).

- Foot pathways will be maintained for surveillance and abatement methods. Sizing of pathways will be a minimum of 5 feet wide to allow access to any ponded area.~~the pit pond.~~

The ~~reclaimed pond~~pit ~~-~~will be part of the San Diego River (California natural waters) and it is against California Department of Fish and Game regulations for private citizens to plant mosquitofish in waters of the State without a permit. (Title 14 CCR, Fish and Game Code, Section 1.63, Section 6400, and Section 238.5). Because the mosquitofish is not native to California, this species will not be used on the project for mosquito control.

El Monte Nature Preserve will work with the CA Department of Fish and Wildlife and the San Diego County DEH to evaluate alternative controls methods. These may include~~ utilizing native fish species,~~ predatory insects, ~~and or~~ other natural controls and/or introducving native fish species if ponded water is expected to be long term.

2.1.2 Rodents

Rodents are not expected to be a problem on the site as no building structures will be installed other than a scale module. Good housekeeping practices will be followed such as:

- Placing all trash and debris in trash containers
- Covering/closing trash of all containers.

Comment [r11]: Would like to have this removed or stated that NO herbicides will be used, as the project site is a recharge area for the groundwater aquifer.

If evidence of rat activity is observed, the operator will utilize electric or snap traps to control the rodents. Dead rats will be placed in a plastic bag and disposed of in a trash container.

2.~~3~~ 2 Education

Employees engaged in the operation and maintenance of the ~~excavation~~ sand mine and employees of monitoring companies will be trained on how to control vectors. Training sessions will be held at least once per year for all staff. The training shall cover all of the MUP conditions set forth to avoid and/or discourage vector breeding including:

- Chemical and vegetation removal procedures for non-wetland standing water.
- Biological controls and vegetation maintenance for wetland waters.
- Inspection and maintenance procedures for any open water source.
- Routine inspection and maintenance of storm water basin BMPs.

Comment [r12]: See previous comment.

3.0 Long-Term Maintenance

Ongoing maintenance shall include monitoring of the ~~open~~ pit, processing plant area ponds and any detention basins for the existence of vector conditions. Appropriate mitigation measures approved by the Department of Environmental Health – Vector Control Program will be utilized. Maintenance shall continue until reclamation has been completed and approved.

4.0 SUMMARY OF MITIGATION MEASURES TO MINIMIZE VECTORS

Following is a summary of the management practices that the project will implement to minimize vectors:

- Circulate water in settling ponds constantly.
- During the wet season (October through March), visually inspect the open pit, processing plant area ponds and detention basins for the presence of vectors monthly. Implement corrective measures if needed.
- During the dry season (July through September) visually inspect the open pit, processing plant area ponds and detention basins weekly for the presence of vectors. Implement corrective measures if needed.

Comment [r13]: Same comments as in Section 2.1.1.

- Remove emergent vegetation when recommended by the DEH San Diego County, Vector Control Program or when emergent vegetation (e.g., cattails, sedges, etc.) is in excess of 50% of ~~the~~a water surface area.
- Utilize chemical controls under the advice of DEH.
- Collect and place all trash and debris in trash containers
- Cover/close all trash containers.

Comment [r14]: Would like to have this removed, as the project site is a recharge area for the groundwater aquifer.

5.0 REFERENCES

County of San Diego. 2007. Guidelines for Determining Significance – Vectors, July 30.

6.0 LIST OF PERSONS AND ORGANIZATIONS CONTACTED

Greg Slawson, Senior Vector Ecologist, San Diego County Department of Environmental Health Vector Control Program.

7.0 SIGNATURES

The measures identified herein are considered part of the proposed project design and will be carried out as part of project implementation. I understand the breeding of mosquitoes is unlawful under the State of California Health and Safety Code Section 2060-2067. I will permit the County of San Diego, Vector Surveillance and Control program to place adult mosquito monitors and to enforce this document as needed.

Property Owner _____

Project Applicant _____

Greg Slawson, DEH VCP _____

COUNTY OF SAN DIEGO
PLANNING & DEVELOPMENT SERVICES

5510 Overland Avenue, Suite 110
San Diego, CA 92123
Information (858) 694-2960 Toll Free (800) 411-0017
Website: http://publicservices.sdcounty.ca.gov/citizenaccess

Invoice Date:
5/5/2016

Record Reference:

Record ID #:	PDS2015-MUP-98-014W2
Record Name:	EL MONTE NATURE PRESERVE MUP MOD/ RECLAMATION PLAN
Site Address:	
APN:	760-141-65-00

Financially Responsible Party:

Customer #:	2032783
Name:	EL MONTE NATURE PRESERVE, LLC
Address:	1335 SAN LUCAS COURT
City, ST, Zip:	SOLANA BEACH, CA 92075
Trust Acct #:	2032783-D-03380

Project Description / Scope

MUP modification is to transfer Golf course to a surface mine. The surface mining requres approval o...

Flat Fees To Be Paid

FEES AMOUNT DUE:

Deposits To Be Paid **(Now accepting online deposits to Trust Accounts! Check out "Accela Updates" at WWW.SDCPDS.ORG for details!)**

Dept Request	Description	Amount
PDS		$45,000.00

DEPOSITS AMOUNT DUE: **$45,000.00**

TOTAL AMOUNT DUE: **$45,000.00**

PLEASE PROCEED TO THE CASHIER WITH THIS INVOICE TO MAKE YOUR PAYMENTS...THANK YOU FOR YOUR BUSINESS

DID YOU KNOW PLANNING & DEVELOPMENT SERVICES NOW ACCEPTS ONLINE FEE PAYMENTS AND DEPOSITS TO TRUST ACCOUNTS? LOG ON TO HTTPS://PUBLICSERVICES.SDCOUNTY.CA.GOV/CITIZENACCESS TO GET STARTED!

W.X1.X.WPDS2015-MUP-98-014W2