



County of San Diego

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STATEMENT OF REASONS TO PERMIT THE PROPOSED USE AND ELIMINATE ACCESS TO MINERAL RESOURCES OF REGIONAL SIGNIFICANCE (MRZ-2)

Project Name: OCEAN BREEZE RANCH PARCEL MAP; PDS2016-TM-5615;
PDS2016-MUP-16-012; PDS2016-MUP-013; PDS2016-STP-16-
032, PDS2015-ER-15-08-001

Project Location: The property is located at 5820 West Lilac Road, Bonsall in the
Bonsall and Fallbrook Community Plan areas, within the
unincorporated San Diego County.

Date: September 19, 2019

Purpose of Notice

Section 2762(d) of the Public Resources Code requires the County of San Diego (County) as Lead Agency to prepare, in conjunction with the preparation of an Environmental Impact Report (EIR), and prior to approving a project, a statement specifying the County's reasons for permitting a proposed use in an area that contains mineral resource deposits of regional significance. The County is considering the approval of the proposed Ocean Breeze project, which would allow a planned community in a location that currently contains lands classified by the Mineral Resource Zone (MRZ) System. The County's statement is as follow.

Comments on the project related to mineral resource issues should be directed to Bronwyn Brown at Bronwyn.Brown@sdcounty.ca.gov or at the above address. The comment period begins on September 19, 2019 and ends at 4:30 pm on November 4, 2019

BACKGROUND INFORMATION

Mineral Resource Zone

As mandated by the Surface Mining and Reclamation Act of 1975 (SMARA), the California State Geologist classifies California mineral resources with the MRZ system. The four MRZ zones are defined as follows:

- MRZ-1 – Areas where adequate information indicates that no significant mineral deposits are present or likely to be present.
- MRZ-2 – Areas where adequate information indicates that significant mineral deposits are present or where it is judged that there is a high likelihood for their presence.
- MRZ-3 – Areas containing mineral deposits, the significance of which cannot be evaluated from available data. In contrast to MRZ-2 areas where it has been judged that there is a high likelihood of minable, marketable mineral deposits (notably Portland cement and asphaltic concrete aggregate), MRZ-3 areas are areas where the data is not sufficient to evaluate the significance of any potential aggregate deposit.
- MRZ-4 - Areas where available information is inadequate for assignment to any other MRZ zone.

These zones have been established based on the presence or absence of significant sand and gravel deposits and crushed rock source area, e.g., mineral products used in the production of cement. The classification system emphasizes Portland Cement Concrete (PCC) aggregate, which is subject to a series of specifications to ensure the manufacture of strong durable concrete.

General Plan Update Environmental Impact Report

The General Plan Update Environmental Impact Report (GPU EIR) concluded significant and unavoidable impacts to mineral resources. The Project would result in significant impacts to mineral resources. As there are no feasible mitigation measures, the Project's impacts to mineral resources would be significant and unavoidable. Since the GPU EIR concluded significant and unavoidable impacts to mineral resources, the Project would not result in an impact which was not adequately evaluated by the GPU EIR.

Project Description

The Ocean Breeze Ranch consists of two distinct parts: A residential development project containing 396 single family detached lots, roads, parks and landscaping and an equestrian facility primarily consisting of previously constructed buildings and facilities, and several future proposed additional structures. The project site is approximately 1,402 acres and is located off West Lilac Road, west of Interstate 15 and

south of SR 76. The project includes preservation of 954.25 acres as biological open space.

Potentially available mineral resources on MRZ-2 lands within the Project Site:

According to the *Mineral Resources Investigation Ocean Breeze Ranch (2019)* dated March 12, 2019 completed by GeoSoils, Inc. for the County of San Diego, the amount of onsite land of MRZ-2 quality within the Ocean Breeze Ranch project site is estimated at 251.09 acres.

Potential project impacts on the MRZ-2 Area (Project Site and Adjacent Lands):

The area proposed to be included in the development footprint would preclude future access to the underlying minerals. Thus, the project would effectively eliminate access for mineral extraction (on- and off-site) to approximately 398.54 acres of significant mineral resources (MRZ-2). This includes MRZ-2 quality material located on adjacent land within a 1,300-foot buffer of the residences proposed by the project. This buffer would be utilized to achieve adequate separation of the proposed residences from the noise and dust of a hypothetical mining operation on the adjacent lands. The 398.54 acres equates to an estimated 13,373,940 tons of MRZ-2 mineral resources with an estimated value of \$187,235,155.00 (2018 dollars).

REASONS WHY COUNTY MAY PERMIT THE LOSS OF POTENTIAL MINERAL RESOURCES, BY IMPLEMENTATION OF THE PROPOSED PROJECT

The County of San Diego has the following reasons why it may permit the loss of potential mineral resources at the Ocean Breeze project site:

Biological Open Space

A substantial portion of the property, comprising 832.7 acres or 59.4% of the site, will be preserved in as open space for the protection of biological and natural resources. An open space easement will protect these lands in perpetuity and will restrict future uses in order to preserve their biological value. The site has been identified by the County, California Department of Fish and Wildlife and the US Fish and Wildlife Service as part of an important biological core area as discussed in the Biological Resources Report dated 08/17/19 and prepared by HELIX Environmental. This core area is under consideration for preservation in a proposed North County Multiple Species Conservation Plan. The function of the property as a biological core resource area cannot be duplicated or moved to another location. Mineral extraction would not be compatible with the protection of biological resources.

Other Open Space

The proposed project would preserve 15.7 acres for private and public parkland and recreational opportunities.

County-wide Use of Crushed Stone as an alternative to Alluvial Sand and Gravel

Map Sheet 52 Aggregate Sustainability in California provided by the California Geological Survey and updated in 2012 specifically states “Although more care is required in pouring and placing a wet mix containing crushed stone, PCC made with this aggregate is as satisfactory as that made with alluvial sand and gravel of comparable rock quality. Owing to environmental concerns and regulatory constraints in many areas of the state, it is likely that extraction of sand and gravel resources from instream and floodplain areas will become less common in the future. If this trend continues, crushed stone may become increasingly important to the California market.” The *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements Mineral Resources state*, “Within the County, crushed rock is the primary source of locally mined PCC aggregate.” These guidelines additionally state, “Within the unincorporated portion of the County, potential deposits for crushed rock are extensive (hundreds of square miles)... PCC made with crushed rock aggregate can generally be satisfactory and can supplement the local supply of alluvial sand and gravel.”

Crushed stone is already the predominate supply of aggregate in San Diego County, where there are extensive potential recoverable deposits. These deposits are currently utilized and can be utilized in the future to supply not only the unincorporated portion of San Diego County that the County has land use jurisdiction over, but can also be utilized by all of the incorporated communities that may not have alluvial or crushed stone deposits, or may be unwilling to permit the extraction of their deposits.

County of San Diego General Plan Housing Element

Although several Conservation and Open Space Policies have been referenced in this statement, the County must also consider its commitment to the General Plan Housing Element. As stated in the Policy Framework “the County is allocated a share of the region’s housing needs that is equivalent to 22,412 units. The County must, through appropriate zoning and development standards, accommodate these units through a variety of housing types and various income groups.” Just as the County is expected to consider the importance of the MRZ-2 minerals to their market region as a whole and not just on the unincorporated portion of San Diego County, the County must consider its commitment to providing its regional fair share of housing opportunities for all San Diego County residents, and not just those that currently live in the unincorporated portions of San Diego County that the County has land use jurisdiction over. The Ocean Breeze project would provide 396 residential units which would help the County achieve its share of the region’s housing needs.

Road Improvements

The proposed project would contribute several million dollars toward public road improvements. Improvements will include a roundabout at Camino del Rey and West Lilac intersection; a signalization at West Lilac and Old Highway 395 and an all-way stop control at Lilac Road and Old Castle Road. The project will also be required to make contributions to Caltrans SR-76 for corridor improvements as well as Transportation Impacts Fees (TIF) associated with county facilities.

Employment

The proposed project would provide interim employment opportunities during construction and permanent employment opportunities to support the commercial component of the project.

Fire Safety

The proposed project would improve fire safety on the subject property and in surrounding areas. Two Fire Protection Plans, one for the Planned Residential Development and one for the equestrian facility have been prepared by Firewise 2000, Inc. for the proposed project. The fire protection plans have considered the property location, topography, geology, combustible vegetation (fuel types), climatic conditions and fire history as part of the assessment. In addition, the plan addresses water supply, access, structural ignitability and ignition resistive building features, fire protection systems and equipment, impacts to existing emergency services, defensible space, and vegetation management. Based on the above factors and analysis, the plans identify areas for hazardous fuel reduction treatments and recommends, the types and methods of such treatment, as well as measures that the property owners would take to reduce the probability of ignition of structures throughout the development.
