



County of San Diego

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October 24, 2019

CEQA Initial Study - Environmental Review Checklist Form (Based on the State CEQA Guidelines, Appendix G)

1. Title; Project Number(s); Environmental Log Number:

Cottonwood Sand Mine; PDS2018-MUP-18-023, PDS2018-RP-18-001, PDS2018-ER-18-19-007

2. Lead agency name and address:

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

3. Contact: Robert Hingtgen, Environmental Coordinator

Phone number: (858) 694-3712

E-mail: Robert.Hingtgen@sdcounty.ca.gov

4. Project applicant's name and address:

New West Investment Group, Inc.; Greg Brown
565 N. Magnolia Avenue
El Cajon, CA 92020

5. General Plan

Community Plan: Valle de Oro

Land Use Designation: Open Space (Recreation)

Density: N/A

Floor Area Ratio: N/A

6. Zoning: S-80 – Open Space, S88 - Specific Planning Area,
S-90 – Holding Area

Minimum Lot Size: N/A

Special Area Portion F (Floodplain)

Regulation:

7. Project Location:

The project site entrance is at 3121 Willow Glen Drive in the Valle de Oro Community Planning Area, within the southwestern portion of the unincorporated area of San Diego County. The project site extends west to east from approximately 600 feet east of the intersection of Willow Glen Drive and Jamacha Road, to approximately 0.25 miles west of the intersection of Willow Glen Drive and Hillsdale Drive. Willow Glen Drive parallels the north side of the project site and Steele Canyon Road bisects the western portion of the site.

8. Description of Project:

The project proposes to convert two golf courses to a sand mining operation that would be conducted in three phases over 10 years. Aggregate extraction during Phase 1 would be located within the area currently occupied by the closed 18-hole golf course at the western portion of the project (Lakes course). Extraction during Phases 2 and 3 at the center and eastern portion of the site would occur on currently operating golf course (Ivanhoe course). The Ivanhoe course and clubhouse operations would cease upon approval of the sand mine operation, if approved. The entire extraction process is expected to be complete after an approximately 10-year period. Reclamation activities would begin in the second year as mining proceeds to the east and would end two years after mining activities cease.

The Major Use Permit would apply to approximately 251 acres of the 280-acre property. Approximately 214 acres would be excavated for aggregate and reclaimed by grading and revegetation. The remaining acreage that would not be mined would be subject to removal of invasive species or be left in its current condition. Specifically, the existing Sweetwater River channel and the majority of native habitat that currently exists on the site would be retained. The remaining portions of the site would be mined resulting in removal of golf course features, and invasive species would be removed and replaced with native species as part of the reclamation plan for the project.

The project's mining operations would extract, process, and transport aggregate using conventional earth moving and processing equipment. Approximately 4.8 million cubic yards (CY) (7.05 million tons) of material would be extracted, with approximately 3.8 million CY (5.7 million tons) produced for market use. Extraction operations would be limited to a maximum production of 380,000 CY (570,000 tons) of construction grade aggregate per calendar year. Sand extracted and processed at the site would be suitable for construction uses and would be available to customers in San Diego County.

The project would be developed in three continuous phases, beginning with the placement of the processing plant and the conveyor line from the plant to the western portion of the property where Phase 1 would begin. The plant site would consist of aggregate processing and washing facilities, three settling ponds, loadout area, and support structures and buildings (e.g., modular scale house and weigh scales, two tool storage containers, office kiosk, and office trailer). The conveyor line would transport excavated materials to the plant from the Phase 1 area by extending under Steel Canyon Road. The conveyor line would be mobile to provide access within each phase and would be relocated as mining activity is concluded in preceding phases.

Existing vegetation and infrastructure in the existing and former golf courses would be removed as mining operations proceeds, with approximately 20 to 25 acres subject to mining at any one time. The maximum excavation depth is proposed to be 40 feet below the existing land surface outside the channel. The average depth of excavation is expected to be approximately 20 feet.

During mining, the project site would contain de-siltation basins that would prevent sediment from leaving the site while allowing water to pass through to existing drainage features. Mining and reclamation grading would direct runoff from the disturbed areas towards the basins. Silt fences would be installed five feet from the outer edge of each side of the existing Sweetwater River channel. Also, as part of the project design, operations would implement erosion control measures in accordance with set criteria to reduce on- and off-site erosion. These measures include monitoring soil movement, arresting gullies or rills using straw mulch and hay bales, and installing silt fencing, compacting soils with equipment, and re-grading as necessary.

Sand excavation and processing is proposed to occur Monday through Friday, between the hours of 7:00 A.M. and 5:00 P.M. Trucking operations for material sales would occur during the week from 9:00 A.M. to 3:30 P.M. to avoid peak traffic periods in the surrounding area.

The existing driveways and parking lot located on Willow Glen Drive next to the clubhouse would be modified to accommodate site access for mining operations and material sales. A new access point to the property from Willow Glen Drive west of the Steele Canyon Road (Phase 1 area) would be necessary as the clearance height of the bridge that crosses the Sweetwater River on Steele Canyon Road would not allow most large trucks or heavy equipment used for mining operations to pass beneath the bridge. This new access point is proposed to be constructed at the intersection of Willow Glen Drive and Muirfield Drive. The new driveway would be restricted to servicing the mining operations.

As resource extraction is completed in an area, backfilling of specific areas with wash fines produced from the processing plant would begin. Reclamation would include establishment of all final slopes, incorporation of accumulated wash fines and topsoil, revegetation of the channel using native species common to riparian habitat, weed control, and monitoring. The final landform is proposed to be a relatively flat plain that gently slopes downward from east to west, with a widened river channel bisecting the length of the site. Banks of the river channel would slope up to the plain surface at a 3:1 (horizontal:vertical) ratio or shallower. The elevation difference between the bottom of the river channel and the top of the slope would be up to 25 feet. The widened river channel is expected to average approximately 250 to 300 feet in width.

The widened river channel and associated graded slopes would be revegetated by planting the areas with native riparian and upland vegetation. Revegetated areas would be maintained and monitored for a minimum of five years, or until the project's performance standards are met. Performance standards would include native cover, non-native cover, invasive species cover, and native species richness criteria.

Reclamation efforts would commence within two years after commencement of mining operations and would be continuous throughout the term of the operations. Topsoil material would be salvaged and stored in low berms or windrows along the edges of the excavation boundaries and then mixed with wash fines and placed as final cover on areas that have reached final grade. When mining operations are completed, all mobile equipment and the processing plant would be removed from the site. This would be followed by final reclamation and revegetation of the processing plant area. Reclamation and revegetation would be implemented on an ongoing basis and would continue until all performance standards have been achieved.

The Project site is currently zoned as Open Space (S80, with 8-acre minimum lot sizes), Specific Planning Area (S88), and Holding Area (S90). Extractive use is allowed within the S80 and S90 classifications with the issuance of a Major Use Permit. There is only one parcel zoned S80 totaling approximately 4 acres at the southwestern boundary of the site. The S80 designation is used to provide appropriate controls for areas considered generally unsuitable for intensive development, including hazard or resource areas, public lands, recreation sites, or lands subject to open space easement or similar restrictions. No sand mining activities are proposed on this parcel.

The S90 zone is intended to prevent isolated or premature land uses from occurring on lands for which adequate public services and facilities are unavailable or, for which the determination of the appropriate zoning regulations is precluded by contemplated or adopted planning proposals or by a lack of economic, demographic, geographic, or other data. The majority of sand mining activities are proposed on parcels zoned S90.

S88 zoning restricts extractive uses to site preparation, which allows the off-site removal of materials when it is secondary to the future use of the site. The parcels zoned as S88 are in the southwestern corner of the Reclamation Plan boundary, within the Rancho San Diego Specific Plan area of the Valle de Oro Community Plan area. These parcels are 506-021-19-00 (8.2 acres) and 519-011-03-00 (23.8 acres). The primary reasons for including the two parcels in the project boundary are to improve the channel; increase the area of native, riparian vegetation footprint; and construct community trails. Portions of the parcels not mined, but currently used by the golf course, also would be reclaimed and revegetated to a more natural condition. This part of the channel is currently a choke point for water as it exits the property and the existing vegetation is dominated by invasive plant species. Expanding the channel at this location and revegetating the area would improve drainage and replace non-native, invasive species with native species. To improve the channel and expand the riparian vegetation in this area, sand and gravel material would be removed from approximately 8.2 acres of the 32 acres (approximately 25 percent). Work in this area, including the planting of native species, would be completed in the first phase of the project. The end use for both parcels would be open space, consistent with the Specific Plan.

9. Surrounding land uses and setting:

The proposed project is located within the County’s Valle de Oro Community Plan area within a valley through which the Sweetwater River flows. The Rancho San Diego commercial district is located less than one-quarter mile to the northwest of the project site. Just beyond and to the west of this commercial district lays Cuyamaca College. Residential areas of the Cottonwood community lay adjacent to the north side of the project site on the north side of Willow Glen Drive. Residential areas of the Jamacha community lay adjacent to the south side of the project site. Several schools are located near the project site including Jamacha Elementary (1,800 feet to the south) and Hillsdale Middle School (2,500 feet to the northwest). A portion of the San Diego Wildlife Refuge administered by the U.S. Fish and Wildlife Service lays adjacent to the west and southwest border of the project site. The Steele Canyon Golf Club lays to the east of the southeast boundary of the project site. Undeveloped land and more rural residential areas are located east of the project site. Hesters Granite Company quarry is located approximately one mile to the northeast of the project site and the Jamacha Quarry on Jamacha Road operated by Superior is located approximately one and one-quarter mile to the north of the west portion of the project site.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

Permit Type/Action	Agency
Landscape Plans	County of San Diego
Major Use Permit	County of San Diego
Minor Grading Permit	County of San Diego
Reclamation Plan	County of San Diego
County Right-of-Way Permits Construction Permit Excavation Permit Encroachment Permit	County of San Diego
401 Permit - Water Quality Certification	Regional Water Quality Control Board (RWQCB)
404 Permit – Dredge and Fill	US Army Corps of Engineers (ACOE)
1603 – Streambed Alteration Agreement	CA Department of Fish and Wildlife (CDFW)
Air Quality Permit to Construct	Air Pollution Control District (APCD)
Air Quality Permit to Operate – Title V Permit	APCD
National Pollutant Discharge Elimination System (NPDES) Permit	RWQCB
General Industrial Stormwater Permit	RWQCB
Waste Discharge Requirements Permit	RWQCB
Fire District Approval	San Miguel Consolidated FPD

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code §21080.3.1? If so, is there

a plan that includes consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

YES

NO

Note: Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and to reduce the potential for delay and conflict in the environmental review process (see Public Resources Code §21080.3.2). Information is also available from the Native American Heritage Commission’s Sacred Lands File per Public Resources Code §5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code §21082.3(e) contains provisions specific to confidentiality.

12. **ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED.** The subject areas checked below would be potentially affected by this project and involve at least one impact that is a “Potentially Significant Impact” or a “Less Than Significant With Mitigation Incorporated,” as indicated by the checklist on the following pages.

NONE

Aesthetics

Agriculture and Forest Resources

Air Quality

Biological Resources

Cultural Resources

Geology & Soils

Greenhouse Gas Emissions

Hazards & Haz Materials

Hydrology & Water Quality

Land Use & Planning

Mineral Resources

Noise

Population & Housing

Public Services

Recreation

Transportation/Traffic

Tribal Cultural Resources

Utilities & Service Systems

Mandatory Findings of Significance

DETERMINATION:

On the basis of this initial evaluation:

- On the basis of this Initial Study, Planning & Development Services finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

- On the basis of this Initial Study, Planning & Development Services finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- On the basis of this Initial Study, Planning & Development Services finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.



Signature

October 24 2019

Date

Robert Hingtgen

Printed Name

Environmental Coordinator

Title

Instructions on Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, Less Than Significant With Mitigation Incorporated, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance

ENVIRONMENTAL REVIEW UPDATE CHECKLIST

I. AESTHETICS – Would the project:

a) Have a substantial adverse effect on a scenic vista?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Potentially Significant Impact. A vista is a view from a particular location or composite views along a roadway or trail. Scenic vistas often refer to views of natural lands but, may also be compositions of natural and developed areas, or even entirely of developed and unnatural areas, such as a scenic vista of a rural town and surrounding agricultural lands. What is scenic to one person may not be scenic to another, so the assessment of what constitutes a scenic vista must consider the perceptions of a variety of viewer groups. The items that can be seen within a vista are visual resources. Adverse impacts to individual visual resources or the addition of structures or developed areas may or may not adversely affect the vista. Determining the level of impact to a scenic vista requires analyzing the changes to the vista as a whole and also to individual visual resources.

The project site is located within the Valle De Oro Community Planning Area and has areas designated as open space (recreation). The Valle de Oro Community Plan states the goal of utilizing scenic highway corridors as one method of protecting and enhancing the appearance of scenic, historical, and recreational areas. Willow Glen Drive is listed a scenic highway corridor, as designated in the County General Plan. The project site is located along the south side of Willow Glen Drive, and the roadway would provide views into the project site. The project site is also visible from an unauthorized walking and equestrian trail south of the project, and there are views from ridges overlooking the project site.

A Visual Impact Analysis for the proposed project will be prepared. Based on the results of the analysis, the project may be required to incorporate avoidance, mitigation or design features to be compatible with the existing visual environment in terms of visual character and quality. This analysis will be fully discussed in the EIR.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> | No Impact |

No Impact. State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic (Caltrans - California Scenic Highway Program). Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape

abutting the scenic highway. Highways in the vicinity of the project site include State Route (SR-) 54, located approximately 500 feet northwest of the project site, and SR-94, located approximately 3,500 feet south of the project site. SR-54 is not an eligible or officially designated state scenic highway. SR-94 is an eligible state scenic highway but, is not officially designated at this time. In addition, due to intervening structures and topography, the project site is not visible from SR-94. Therefore, the project would not damage scenic resources within a state scenic highway; no impacts would occur.

- c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

<input checked="" type="checkbox"/>	Potentially Significant Impact	<input type="checkbox"/>	Less than Significant Impact
<input type="checkbox"/>	Less Than Significant With Mitigation Incorporated	<input type="checkbox"/>	No Impact

Potentially Significant Impact. Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity and continuity. Visual quality is the viewer's perception of the visual environment and varies based on exposure, sensitivity and expectation of the viewers.

The existing visual character and quality of the project site and surrounding area is characterized by the Valle de Oro Community Plan as a balance of urban, semi-rural agricultural, and open space land uses. The project site lies just east of the Rancho San Diego development comprised of a large-scale residential and commercial land uses interspersed with large areas of green-belt and biological open space for wildlife preservation.

A detailed visual analysis will be included in the EIR to address the potential impact on visual character or quality of public views of the site and its surroundings as well as any potential conflicts with zoning or other regulations governing scenic quality during and following project implementation.

- d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

<input type="checkbox"/>	Potentially Significant Impact	<input checked="" type="checkbox"/>	Less than Significant Impact
<input type="checkbox"/>	Less Than Significant With Mitigation Incorporated	<input type="checkbox"/>	No Impact

Less Than Significant Impact. The project would use minimal outdoor lighting for security and safety purposes. The project site is located within Zone B as identified by the San Diego County Light Pollution Code, approximately 42 miles from the Mount Palomar Observatory. However, it will not adversely affect nighttime views or astronomical observations, because the project will conform to the Light Pollution Code (Section 59.101-59.115), including the lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting.

In addition, the proposed project will control outdoor lighting and sources of glare in the following ways:

1. The project would not install outdoor lighting that directly illuminates neighboring properties.
2. The project would not install outdoor lighting that would cast a direct beam angle towards a potential observer, such as a motorists, cyclist or pedestrian.
3. The project would not install outdoor lighting for vertical surfaces such as buildings or equipment in a manner that would result in useful light or spill light being cast beyond the boundaries of intended area to be lit.
4. The project would not install any highly reflective surfaces such as glare-producing glass or high-gloss surface color that will be visible along roadways, pedestrian walkways, or in the line of sight of adjacent properties.

The project is not anticipated to contribute to significant cumulative impacts on day or nighttime views because the project is required to conform to the Light Pollution Code. The Code was developed by the San Diego County Planning & Development Services and Department of Public Works in cooperation with lighting engineers, astronomers, land use planners from San Diego Gas and Electric, Palomar and Mount Laguna observatories, and local community planning and sponsor groups to effectively address and minimize the impact of new sources light pollution on nighttime views. The standards in the Code are the result of this collaborative effort and establish an acceptable level for new lighting. Compliance with the Code is required prior to issuance of any building permit for any project. Mandatory compliance for all new building permits ensures that this project in combination with all past, present and future projects will not contribute to a cumulatively considerable impact. Therefore, compliance with the Code ensures that the project will not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area, on a project or cumulative level.

The Visual Impact Analysis report, EIR and Major Use Permit Plot Plan will address proposed lighting locations, fixture specifications, and potential lighting impacts during and following project mining operations.

II. AGRICULTURE AND FORESTRY RESOURCES – Would the project:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance (Important Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to non-agricultural use?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact. The project does not propose to convert prime, unique, or farmland of statewide/local importance to non-agricultural uses, either directly or indirectly, because all of the project site and surrounding lands are mapped either as “Urban Land” or “Grazing Land” or were mapped as locally important farmland in error due to being located inside a wildlife refuge. Therefore, no impacts would occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

- | | | | |
|--------------------------|---|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation
Incorporated | <input checked="" type="checkbox"/> | No Impact |

No Impact. The project site is not subject to a Williamson Act Contract and is zoned as “Open Space,” “Specific Planning Area,” and “Holding Area” with a General Plan designation of “Open Space (Recreational).” In addition, the Agricultural Preserve 21, located northeast of the project site, had its Williamson Act Contract removed in 2010. Therefore, the project would not conflict with existing zoning for agricultural use, or a Williamson Act contract, and no impact would occur.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(9)), or timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

- | | | | |
|--------------------------|---|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation
Incorporated | <input checked="" type="checkbox"/> | No Impact |

No Impact. The project site, including any offsite improvements, do not contain forest lands as defined in Public Resources Code section 12220(g); therefore, project implementation would not result in the loss or conversion of forest land to a non-forest use.

d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?

- | | | | |
|--------------------------|---|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation
Incorporated | <input checked="" type="checkbox"/> | No Impact |

No Impact. The project site does not contain any forest lands as defined in Public Resources Code section 12220(9); therefore, project implementation would not result in the loss or conversion of forest land to a non-forest use.

e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?

- | | | | |
|--------------------------|---|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation
Incorporated | <input checked="" type="checkbox"/> | No Impact |

No Impact. The project is not anticipated to have indirect impacts relative to the conversion of Important Farmland to non-agricultural uses because such uses do not exist within the project vicinity. Therefore, no impact would occur.

III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

- a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?

Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Potentially Significant Impact. The San Diego Air Pollution Control District (SDAPCD) is required, pursuant to the federal Clean Air Act (CAA), to reduce emissions of criteria pollutants for which the San Diego Air Basin (SDAB) is in nonattainment. Strategies to achieve these emissions reductions are developed in the County’s Regional Air Quality Strategy (RAQS) and the California State Implementation Plan (SIP), prepared by the SDAPCD for the region. Both the RAQS and SIP are based on the San Diego Association of Governments’ (SANDAG) population projections, as well as land use designations and population projections included in general plans for those communities located within the County. A project would be inconsistent with the RAQS/SIP if it is inconsistent with the assumptions within the General Plan.

The project site has a General Plan land use designation of Open Space (Recreational). The project would require approval of a Major Use Permit (MUP) for the proposed mining operations. Mining operations would likely cause emissions greater than anticipated by the RAQS and SIP for the 10-year period mining operations would be conducted. Upon completion of mining operations, the project would reclaim the site and the General Plan land use designation would remain as Open Space. The project would not result in an increase in population. A complete analysis on the project’s air quality emissions with respect to consistency with emissions anticipated by the RAQS and SIP for the General Plan land use designation of Open Space will be discussed in an Air Quality Analysis Technical Report and the EIR.

- b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Potentially Significant Impact. The SDAB is currently classified as a moderate nonattainment area for the 8-hour National Ambient Air Quality Standard (NAAQS) for ozone. The SDAB is also currently classified as a nonattainment area under the California Ambient Air Quality Standards (CAAQS) for ozone, particulate matter with an aerodynamic diameter of 10 microns or less (PM10), and PM2.5. Ozone is formed when volatile organic compounds (VOC) and nitrogen oxides (NOx) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM in both urban

and rural areas include motor vehicles, wood burning stoves and fireplaces, dust from earth-moving activities, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

Operation of the project would generate air pollutant emissions. In particular, emissions of VOCs, NO_x, PM₁₀, and PM_{2.5} could exacerbate ambient air quality conditions in the County, especially considering the nonattainment status of the region with respect to these pollutants. Air emissions from the project will be analyzed and discussed in the Air Quality Analysis Technical Report and the EIR.

c) Expose sensitive receptors to substantial pollutant concentrations?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Potentially Significant Impact. Air quality regulators typically define sensitive receptors as schools (Preschool-12th Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The County also considers residences as sensitive receptors since they often house children and the elderly.

Existing sensitive receptors within the immediate vicinity of the project site include residences to the south and to the north across Willow Glen Drive, and the Jamacha Elementary School located approximately one-quarter mile south of the project site at the intersection of Steele Canyon Road and Jamul Drive. The primary emissions of concern for impacts to sensitive receptors are carbon monoxide (CO), which could occur from on-road vehicle emissions associated with the project, diesel particulate matter (DPM), which would occur from off-road and on-road diesel equipment associated with project, and silica dust from the excavation and processing of the sand and gravel aggregate. Impacts to sensitive receptors from CO and DPM emissions will be evaluated and discussed in the Air Quality Analysis Technical Report and in the EIR.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

- | | |
|-------------------------------------|--|
| <input type="checkbox"/> | Potentially Significant Impact |
| <input checked="" type="checkbox"/> | Less Than Significant With Mitigation Incorporated |
| <input type="checkbox"/> | Less Than Significant Impact |
| <input type="checkbox"/> | No Impact |

Less Than Significant With Mitigation Incorporated. The project could produce objectionable odors from equipment exhaust and processing activities that could affect nearby residences. Impacts associated with odors produced during mining operations will be evaluated, and mitigation measures, as necessary, will be identified in the Air Quality Analysis Technical Report and in the EIR.

IV. BIOLOGICAL RESOURCES – Would the project:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Potentially Significant Impact. The project site primarily consists of operational or defunct golf course, with limited biological value. Nonetheless, portions of the site are expected to support suitable habitat for candidate, sensitive, or special-status species due to the presence of Sweetwater River, patches of on-site vegetation, and adjacent natural open space areas. Several special status animal species have been observed within the project site or flying overhead including Belding's orange-throated whiptail (*Aspidoscelis hyperythra beldingi*), Cooper's hawk (*Accipiter cooperii*), turkey vulture (*Cathartes aura*), western bluebird (*Sialia mexicana*), and vermilion flycatcher (*Pyrocephalus rubinus*). The riparian habitat within the southwestern portion of the site, and riparian forest habitat to the west of the project site, are suitable habitat for the federally listed least Bell's vireo (*Vireo bellii pusillus*). Additionally, coastal California gnatcatcher (*Polioptila californica californica*) has been observed calling to the southwest of the site within the existing preserve. Suitable habitat for the species occurs immediately adjacent to the southwest and northeast of the site. Federally listed San Diego ambrosia (*Ambrosia pumila*) is also known to occur in the project vicinity.

Because portions of the site and adjacent lands have the potential to support several endangered, threatened, or rare plant or animal species or their habitats, the grading and excavation associated with mining activities may have a potentially significant impact on biological resources. As such, potentially significant adverse effects to endangered, threatened, or rare plant or animal species or their habitats will be addressed and discussed in a Biological Resources Technical Report and in the EIR.

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Potentially Significant Impact. The project site supports southern willow scrub and southern cottonwood-willow riparian forest associated with the Sweetwater River channel that traverses the site, as well as upland Diegan coastal sage scrub. While the majority of these vegetation communities would be avoided, direct or indirect impacts could occur to limited areas, which would be revegetated during reclamation upon completion of mining activities. Impacts to the southern

willow scrub, southern cottonwood-willow riparian forest, and Diegan coastal sage scrub present on-site will be analyzed in the Biological Resources Technical Report and discussed in the EIR.

- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Potentially Significant Impact. Potential waters of the U.S., waters of the State, California Department of Fish and Wildlife (CDFW) jurisdictional streambed and riparian habitat, and County Resources Protection Ordinance (RPO) wetlands are present on site. The majority of existing jurisdictional resources would be avoided by project activities. Nonetheless, some impacts to jurisdictional resources may occur. Impacts to jurisdictional resources present on site will be analyzed in a Biological Resources Technical Report and discussed in the EIR.

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Potentially Significant Impact. Wildlife movement through the site is likely limited based on the past and current use of the site as an active golf course. Common predators and mesopredators that may be present within the surrounding area and utilize the golf course for limited foraging or movement activities include coyote (*Canis latrans*), racoons (*Procyon lotor*), and striped skunk (*Mephitis mephitis*). Larger species such as bobcat (*Lynx rufus*) and mule deer (*Odocoileus hemionus*) may also be present in the area and have potential to move through the project site. Although these species would generally be unexpected based on the presence of human activities, surrounding residential development, and availability of open space areas to the south that may be more conducive to wildlife movement patterns and habitat requirements, the potential exists for the site to be used for wildlife movement. Mining operations would temporarily restrict the use of portions of the site by wildlife. While the reclaimed condition would improve the suitability of the site for wildlife movement, temporary impacts would be potentially significant. Impacts to wildlife movement within the project site will be analyzed in a Biological Resources Technical Report and discussed in the EIR.

- e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Potentially Significant Impact. The project site is located within the South County and Metro-Lakeside-Jamul segments of the County’s Multiple Species Conservation Program (MSCP) Subarea Plan. A portion of the site is within a designated Minor Amendment Area; however, this area would not be subject to mining activities. The Biological Resources Technical Report will analyze the project’s consistency with the MSCP and this issue will be fully discussed in the EIR.

V. CULTURAL RESOURCES – Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Potentially Significant Impact. A number of historical resources, including five historic buildings, eight historic sites, and four historic structures, have been identified within a one-mile radius of the project site. On-site potential historical resources that have been identified include the original clubhouse and associated buildings and infrastructure, including bridges, maintenance buildings, pipelines, and restroom facilities around the course. As a result, the project has the potential to cause an adverse change to a potentially significant historical resource. Therefore, the potential for impacts to historic resources will be evaluated in a Cultural Resources Survey Report and fully discussed in the EIR.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Potentially Significant Impact. Numerous archaeological resources have been identified within a one-mile radius of the project site. As a result, the project may cause an adverse change to a potentially significant archaeological resource. Therefore, the potential for impacts to archaeological resources will be evaluated in the Cultural Resources Survey Report and fully discussed in the EIR.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input checked="" type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant With Mitigation Incorporated. A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is located on geological formations with low potential for paleontological resources; however,

excavating into undisturbed ground beneath the soil horizons may cause a significant impact if unknown paleontological resources are encountered. Since an impact to paleontological resources does not typically occur until the resource is disturbed, monitoring during excavation is the essential measure to mitigate potentially significant impacts to unique paleontological resources to a level below significance. Therefore, the EIR will fully analyze these potential impacts and include grading/excavation monitoring, as necessary.

d) Disturb any human remains, including those interred outside of formal cemeteries?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Potentially Significant Impact. Numerous archaeological resources have been identified within a one-mile radius of the project site. Due to cultural sensitivity of the area, the project has the potential to disturb human remains that may be present on site. Therefore, the potential for impacts to human remains will be evaluated in the Cultural Resources Survey Report and be fully discussed in the EIR.

VI. ENERGY -- Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less than Significant Impact: The project is not anticipated to utilize energy resources in a wasteful, inefficient, or unnecessary manner that would have a significant environmental impact. An example of efficient use of energy by the proposed project is the use of conveyor systems to move excavated material across the site to the processing plant area.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant Impact: The proposed project is not anticipated to have any conflict with or obstruct any state or local plan for renewable energy or energy efficiency.

VII. GEOLOGY AND SOILS – Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact. The project site is not located in an earthquake fault zone identified by the California Geological Survey (CDC 2015) or an established Alquist-Priolo Earthquake Fault Zone. Therefore, there will be no impact from the exposure of people or structures to adverse effects from a known fault-rupture hazard zone as a result of this project.

- ii. Strong seismic ground shaking?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact. Although the project site is not located within a known earthquake fault zone, the project site is located within Seismic Zone 4, which is the highest Seismic Zone, and, as with the entire County and most of Southern California, is subject to ground shaking (County 2011). Active faults in the region include segments of the San Jacinto, Elsinore, and Rose Canyon fault zones. Mine workers and equipment may be subject to the effects of seismic ground-shaking during the project's 10-year mining operation period. However, the number of people exposed to this potential hazard on the site would be reduced relative to current golf course operations and associated potential effects would be limited. Impacts would be less than significant.

- iii. Seismic-related ground failure, including liquefaction?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant. The potential for seismic-related ground failure is associated with the probability of severe ground shaking as a result of an earthquake at a nearby active fault. Liquefaction is the phenomenon where saturated granular soils develop high-pore water pressures during seismic shaking and behave like a heavy fluid. This phenomenon generally occurs in areas of high seismicity where groundwater is shallow and loose granular soils or hydraulic fill soils subject to liquefaction are present. For liquefaction to occur, loose granular sediments below the groundwater table must be present and shaking of sufficient magnitude and duration must occur. Groundwater is present beneath the project site at depths between 5 and 18 feet. The project does not include permanent structures that would be at risk from liquefaction. While mining personnel and equipment could be at risk during the 10-year mining operation period, the number of people exposed to this potential hazard on the site would be

reduced relative to current golf course operations, and the associated potential risk is low (GEOCON 2019). Impacts would be less than significant.

iv. Landslides?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant Impact. The project site is located within an area identified as having a moderate landslide susceptibility (County 2011). However, no evidence of landsliding was encountered at the site during the geotechnical investigation or in the review of historic, stereoscopic aerial photographs. The risk associated with ground movement hazard due to landsliding was therefore determined to be low (GEOCON 2019), and impacts would be less than significant.

b) Results in substantial soil erosion or the loss of topsoil?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant Impact. The project's mining operations would result in approximately 20 to 25 acres at a time of exposed soils that would be subject to erosion. To minimize effects related to erosion, the project would include de-siltation basins that would prevent sediment from leaving the site while allowing water to pass through to existing drainage features. Mining and reclamation grading would direct runoff from the disturbed areas towards the basins. The existing Sweetwater River channel would be avoided and silt fences would be installed five feet from the outer edge of each side of the channel. Operations would implement erosion control measures in accordance with set criteria to reduce on- and off-site erosion. These measures include monitoring soil movement, arresting gullies or rills using straw mulch and hay bales, and installing silt fencing, compacting soils with equipment, and re-grading as necessary. Prior to mining excavation, approximately four inches of topsoil would be placed in stockpiles to be reapplied during reclamation. When possible, topsoil would be directly reapplied to areas that have reached final grade to avoid storing in stockpiles. Following the completion of mining activities, the site would be reclaimed with natural vegetation, which would stabilize the surface and minimize erosion.

Based on the design features incorporated into project operations and subsequent reclamation, including conformance with associated regulatory requirements, impacts would be less than significant.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

- | | | | |
|--------------------------|--------------------------------|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input checked="" type="checkbox"/> | Less than Significant Impact |
|--------------------------|--------------------------------|-------------------------------------|------------------------------|

- Less Than Significant With Mitigation Incorporated No Impact

Less Than Significant Impact. The Soil and Geologic Reconnaissance prepared for the project identified the geologic units/soils underlying the project site as undocumented fill, alluvium, and granite bedrock. The project's mining operations would involve substantial excavation and the creation of slopes throughout the project site. The stability of these slopes during mining operations would be governed by the Mine Safety and Health Administration to ensure worker safety. The proposed permanent slopes would be a maximum grade of 3:1 (horizontal to vertical). Analysis performed on the tallest cut slope proposed for the project determined that this slope would have a factor of safety of greater than 1.5 (GEOCON 2019). As such, geologic hazards associated with the on-site geologic units/soils would be less than significant.

- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

- Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Less Than Significant Impact. Expansive soils are soils subject to volumetric fluctuations in response to changes in moisture content (wetting and drying). Expansive soils have a substantial amount of clay particles, which can both release water (shrink) or absorb and hold water (swell). The project site is generally underlain with sand-based soils, which would be removed through the project's mining activities. The majority of the site would then be reclaimed to open space. No expansive soils would be present and no structures or people would be present or at risk from expansive soils. Therefore, potential impacts related to expansive soils would be less than significant.

- e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

- Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

No Impact. The project would generate minimal wastewater and would not include the use of septic tanks or alternative wastewater disposal systems. No impacts would occur.

VIII. GREENHOUSE GAS EMISSIONS – Would the project:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

- Potentially Significant Impact Less than Significant Impact

- Less Than Significant With Mitigation Incorporated No Impact

Potentially Significant Impact. Global climate change refers to changes in average climatic conditions on Earth, as a whole, including temperature, wind patterns, precipitation, and storms. Global temperatures are moderated by naturally occurring atmospheric gases. These gases are commonly referred to as greenhouse gases (GHGs) because they function like a greenhouse by letting light in but preventing heat from escaping, thus warming the Earth's atmosphere. These gases allow solar radiation (sunlight) into the Earth's atmosphere but prevent radiative heat from escaping, thus warming the Earth's atmosphere.

GHGs are emitted by natural processes and human (anthropogenic) activities. Anthropogenic GHG emissions are primarily associated with (1) the burning of fossil fuels during motorized transport, electricity generation, natural gas consumption, industrial activity, manufacturing, and other activities; (2) deforestation; (3) agricultural activity; and (4) solid waste decomposition.

The GHGs, as defined under California Assembly Bill (AB) 32, include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Although water vapor is the most abundant and variable GHG in the atmosphere, it is not considered a pollutant; it maintains a climate necessary for life.

The County has prepared *Draft Guidelines for Determining Significance and Draft Report Format and Content Requirements* for addressing climate change in CEQA documents. The County has also prepared and adopted a Climate Action Plan (CAP) that includes GHG reduction measures that, if fully implemented, would achieve an emissions reduction target that is consistent with the state-mandated reduction target embodied in AB 32 and SB 32.

Project operations would last approximately 12 years total, with 10 years of mining operations and 2 additional years for final reclamation and revegetation. These operations would require the use of off-road equipment, stationary processing equipment, and vehicles for worker travel that would emit GHGs. Operation of the proposed project would generate GHG emissions that could exceed significance criteria that will be developed based on County guidance. GHG emissions from the project will be evaluated in a Climate Change/GHG Emission Analysis Technical Report, which will include quantification of GHG emissions, comparison of the emissions to the appropriate significance criteria, and identification of mitigation measures and emission reduction measures, as necessary, that are consistent with the County's CAP. This issue will be fully discussed in the EIR.

- b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

- Potentially Significant Impact Less than Significant Impact

- Less Than Significant With Mitigation Incorporated No Impact

Potentially Significant Impact. As discussed in (a) above, the project would generate GHG emissions during its 12-year mining and reclamation period and could have a cumulatively considerable impact with respect to GHG emissions. Projects that could have cumulatively considerable GHG emissions impacts need to incorporate relevant measures from the County's CAP. The project's consistency with the County's CAP and County Guidelines will be assessed in a Climate Change/GHG Emission Analysis Technical Report and be fully discussed in the EIR.

IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

- Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Less Than Significant Impact. Operation of the proposed mining activities would involve the on-site use and/or storage of hazardous materials such as fuels, lubricants, and solvents associated with off-road equipment and processing machinery. Equipment would be maintained on site and all used oils, fuels, and solvents would be collected in accordance with the Department of Toxic Substances Control (DTSC) regulations and removed from the project site by an approved hauler for materials recycling. Based on compliance with such regulatory requirements, potential impacts from mining operation-related hazardous materials would be effectively avoided, and impacts would be less than significant.

- b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

- Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Less Than Significant Impact. At its nearest point, the project site is approximately one-quarter mile from Jamacha Elementary School, which is located south of the project site at the intersection of Steele Canyon Road and Jamul Drive. The project's use of standard equipment materials, such as fuels, lubricants, and solvents, would be handled in accordance with DTSC regulations. In addition, it is likely that equipment maintenance and associated hazardous materials use would occur in the area where the processing equipment is located, which would be in the northern portion of the project site along Willow Glen Road and over one-quarter mile from Jamacha Elementary School. Therefore, impacts would be less than significant.

- c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant Impact. A review of the Envirostor (DTSC 2018) and Geotracker (SWRCB 2015) databases revealed the presence of one listed hazardous materials site within the project boundary, located in the area near the existing maintenance facility where underground fuel tanks were removed. Specific information on the hazardous materials associated with this listing is not available; however, the Geotracker database indicates that the case was completed and closed as of August 1987 (SWRCB 2015). Therefore, the site would not create a significant hazard upon implementation of the proposed project. Hazardous materials, such as fertilizers and pesticides, associated with golf course maintenance and operations may be present on site. The use of these materials would be phased out as mining activities proceed, with any excess materials properly disposed of in accordance with applicable regulations. Therefore, impacts related to hazardous materials would be less than significant.

- d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> | No Impact |

No Impact. The nearest airport to the project site is Gillespie Field, located approximately 6.2 miles to the northwest. The project site is not within the Airport Influence Area of Gillespie Field (San Diego County Regional Airport Authority 2010) and would therefore not result in a safety hazard for people residing or working in the project area; no impacts would occur.

- e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> | No Impact |

No Impact. The nearest private airstrip to the project site is the helipad associated with the Sharp Grossmont Hospital, located approximately 5.3 miles to the northwest. Based on this distance, the project would not constitute a safety hazard for people residing or working in the project area.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact. Operation of the project would occur within the project site boundaries and would not involve road closures. Although the project would generate an increase in on-road traffic in the form of haul trucks and worker commute vehicles during the 10-year mining operation period, the increase is not expected to substantially disrupt travel along existing roadways in the project area. In addition, Steele Canyon Road, which traverses the project site, would remain functional during project operation. Therefore, implementation of the project would not physically interfere with an adopted emergency response or evacuation plan; impacts would be less than significant.

g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact. Portions of the project site are designated as moderate, high, and very high fire hazard severity zones. Areas to the south and east of the project site are also mapped as very high fire hazard severity zones (California Department of Forestry and Fire Protection 2007). A fire protection plan (FPP) letter report has been prepared for the project and includes recommendations for fuel modification treatments to protect and minimize potential damage at the project site from wildland fire. Sand mining activities would result in a decrease of combustible fuels on the site and the project would comply with the recommendations of the FPP. Therefore, impacts would be less than significant.

h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact. Mining operations associated with the project would involve the use of three on-site settling ponds. The settling ponds, however, are not anticipated to provide habitat for mosquito vectors as they will be utilized for industrial activities and will accommodate a constant input of mined materials. Therefore, the project would not increase current or future resident's exposure to vectors capable of transmitting significant health diseases or nuisances.

X. HYDROLOGY AND WATER QUALITY – Would the project:

a) Violate any waste discharge requirements?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant Impact. Due to the nature of the proposed project, pollutant generation would consist primarily of sediment, with other potential contaminants including trash, debris, and oil and grease from operation and processing equipment/activities. The project would be subject to applicable water quality requirements of the Clean Water Act (CWA)/National Pollution Discharge Elimination System (NPDES) Industrial General Permit, the California Surface Mining and Reclamation Act of 1975 (SMARA), and the Regional Water Quality Control Board (RWQCB) Basin Plan. Conformance with these requirements would involve the use of appropriate best management practices (BMPs) during and after project operations to address potential impacts associated with the described contaminants. Specifically, conformance with the Industrial General Permit would entail preparing and implementing an approved stormwater pollution prevention plan (SWPPP) to address potential issues including erosion/sedimentation and the discharge of operational contaminants as noted above (with these measures to address other applicable water quality standards as well). While detailed BMPs related to Industrial Permit requirements would be determined as part of the Project NPDES/SWPPP process based on site-specific factors, they would likely include the types of standard industry measures based on direction in the Industrial General Permit.

In addition to the erosion and sedimentation BMPs to be implemented as part of the described NPDES SWPPP, the proposed Reclamation Plan includes a number of measures to address both short- and long-term erosion/sediment control in association with proposed operations.

Project-related activities would not result in direct effects to groundwater quality through activities such as underground storage of hazardous materials (e.g., underground fuel storage tanks). Accordingly, potential impacts to groundwater quality would be limited to the percolation of surface runoff and associated contaminants generated within the project impact footprint. This assessment of potential water quality impacts is therefore applicable to both surface and groundwater resources.

Because the project would be subject to the requirements of the NPDES permits, the project's construction and operation would not violate waste discharge requirements. Impacts related to violation of waste discharge requirements would be less than significant.

b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant Impact. The Sweetwater River runs through the project site and flows southwest through the Sweetwater watershed/hydrological unit. It is a tributary to the following impaired water bodies: San Diego Bay Shoreline, San Diego Bay, Paradise Creek, the Lower Sweetwater River, and Sweetwater Reservoir. The CWA Section 303(d) list identifies pollutants for each of these water bodies. These include enterococcus, fecal coliform, phosphorus, selenium, total dissolved solids (TDS), Total nitrogen as N, toxicity for the Lower Sweetwater River; total coliform, enterococcus, fecal coliform, and polychlorinated biphenyls (PCBs) for the Pacific Ocean shoreline; selenium in Paradise Creek, PCBs in San Diego Bay, and dissolved oxygen in Sweetwater Reservoir.

As noted in IX.a., the project would be subject to applicable water quality requirements of the CWA/NPDES Industrial General Permit, SMARA, and the RWQCB Basin Plan. With adherence to these requirements, associated increases to any pollutant for which these water bodies are already impaired would be rendered less than significant.

- c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact. The project is not anticipated to create or contribute runoff water that would cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives, as the project site would incorporate appropriate project features and BMPs to minimize water quality impacts, including de-siltation basins that would prevent sediment from leaving the site while allowing water to pass through to existing drainage features. Mining and reclamation grading would direct runoff from the disturbed areas towards the basins. As noted in IX.a., the project would be subject to applicable water quality requirements of the CWA/NPDES Industrial General Permit, SMARA, and the RWQCB Basin Plan. With adherence to these requirements, associated contribution to exceedance of applicable receiving water quality objectives or degradation of beneficial uses would be rendered less than significant.

- d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact. Groundwater would be used during the project's mining operations for material processing, dust control, and irrigation. Water usage would depend on production volume, which would vary year-to-year with market demand; however, the project's estimated water usage assumes the maximum annual production of 570,000 tons. Water usage

at the plant is estimated at 96 acre-feet annually for this production rate. A single water truck would be required for dust control. Water required to suppress dust from the mining operations is estimated to require 74 acre-feet of water per year. Irrigation of the landscaping near the entrance and as supplemental water on revegetated areas is estimated to utilize approximately 54 acre-feet per year. Total water consumption for the project, including evaporation, is estimated at 227 acre-feet per year. Water for processing, dust control, and irrigation would be supplied by on-site groundwater wells.

Eight groundwater wells on the property currently provide irrigation water for the golf courses on the property. These wells would be used to provide water for the mining operation. Existing use of groundwater by the golf courses has been estimated at approximately 702 acre-feet per year based on pump ratings and irrigation schedules. Mining operations would significantly reduce this groundwater use. In addition, the project's water requirement would be limited to 12 years for mining operations and reclamation period irrigation. Upon completion of mining and reclamation activities, the project would discontinue extracting water from the on-site wells. The reclaimed open space would consist of porous soils that would allow rainwater to infiltrate into the ground water table. Therefore, the project would not substantially deplete groundwater supplies or interfere with groundwater recharge.

- e) 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?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input checked="" type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant With Mitigation Incorporated. The project would alter the existing drainage pattern of the site through removal of material during mining operations. During mining, the project site would contain de-siltation basins that would prevent sediment from leaving the site while allowing water to pass through to existing drainage features. Mining and reclamation grading would direct runoff from the disturbed areas towards the basins.

The existing Sweetwater River channel would be avoided and silt fences would be installed five feet from the outer edge of each side of the channel. Also as part of the project design, operations would implement erosion control measures in accordance with set criteria to reduce on- and off-site erosion. These measures include monitoring soil movement, arresting gullies or rills using straw much and hay bales, and installing silt fencing, compacting soils with equipment, and re-grading as necessary. Additionally, as noted in IX.a, the project would be required to obtain a NPDES Industrial General Permit, which would outline ways to reduce pollutant discharges, including those related to erosion and sedimentation. Impacts associated with erosion and siltation would be less than significant during operations.

The Sweetwater River channel would be widened as a result of the mining activity. The channel and associated graded slopes would be established with native riparian and upland vegetation, which would stabilize soil and minimize the potential for erosion and siltation. The project analysis will include a Drainage/Hydrology Study to address drainage function of the site during mining activities and for the reclaimed project condition including analysis and discussion of

measures to prevent erosion and siltation. A summary of this analysis will be included in the EIR.

- f) 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?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Potentially Significant Impact. The proposed project would significantly alter established drainage patterns of the project site through the alteration of Sweetwater River and extensive grading and excavation during mining activities; however, such alterations are not anticipated to substantially increase the rate or amount of surface runoff because the project would not increase the amount of impervious surface on site. Temporary impacts associated with runoff and flooding during mining activities will be evaluated in a hydrology study and discussed further in the EIR.

Upon completion of mining operations, the Sweetwater River channel would be widened. The project would not permanently increase impervious surfaces and would therefore not increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. The project analysis will include a Drainage/Hydrology Study to address drainage function of the site during mining activities and for the reclaimed project condition. A summary of this analysis will be included in the EIR.

- g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant Impact. The project would not generate an increase in runoff water because the project would not increase the amount of impervious surface on site. Runoff from rain events during mining operations would be directed into de-siltation basins and then to existing drainage features. Temporary impacts associated with runoff during mining activities will be evaluated in the Drainage/Hydrology Study and discussed in the EIR.

Upon completion of mining operations, the site would be reclaimed to open space and would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems. Permanent long-term impacts would be less than significant.

- h) Provide substantial additional sources of polluted runoff?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant. During the project's mining operations, potential pollutants, such as gasoline, lubricants, solvents, and oils associated with mining equipment maintenance, as well as sediment associated with grading and excavation activities, would be present on site. Proper BMPs and project design features, such as the on-site de-siltation basins, would be required to reduce potential pollutants in runoff to the maximum extent practicable. Furthermore, as noted in IX.a., the project would be required to obtain a NPDES Industrial General Permit, which when implemented would prevent pollutants from entering receiving waters. Impacts associated with polluted runoff during mining activities would be less than significant.

Upon completion of mining operations, the site would be reclaimed to open space and would not provide substantial sources of polluted runoff. Permanent long-term impacts would be less than significant.

- i) 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?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact. The project does not include housing. No impacts would occur.

- j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Potentially Significant Impact. The project site is within Regulatory Floodway Zone AE, within a special flood hazard area (Federal Emergency Management Agency [FEMA] 2012). The project does not propose permanent structures that would impede or redirect flood flows. Impacts associated with the presence of temporary structures associated with the processing plant during mining operations will be fully analyzed and discussed in the Drainage/Hydrology Study and in the EIR.

- k) Expose people or structures to a significant risk of loss, injury or death involving flooding?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Potentially Significant Impact. The project site is within a special flood hazard area and therefore has the potential to expose mine workers and equipment to risk during the project's

10-year mining operation period. Flood-related impacts during mining operations will be further analyzed and discussed in the Drainage/Hydrology Study and in the EIR.

l) Inundation by seiche, tsunami, or mudflow?

i. Seiche

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> | No Impact |

No Impact. The closest water body to the project site capable of producing a seiche is the Sweetwater Reservoir, located approximately 4.5 miles downstream to the southwest. Based on this distance, the project site is not at risk of inundation by seiche.

ii. Tsunami

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> | No Impact |

No Impact. The project site is located over 14 miles from the Pacific Ocean. Based on this distance, the project site is not at risk of inundation by tsunami.

iii. Mudflow

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant Impact. Mudflow is type of landslide. As described in Section VI.a.iv, there is no evidence of landslides at the site, and the risk associated with ground movement hazard due to landsliding is low (GEOCON 2019). Impacts would be less than significant.

XI. LAND USE AND PLANNING – Would the project:

a) Physically divide (or isolate) an established community?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> | No Impact |

No Impact. The project site is currently used as a golf course that is only available for use by visitors to the course. It does not provide pedestrian access through the site for nearby residents. The project site is currently bisected by Steele Canyon Road that connects Willow Glen Drive to communities along Jamul Drive and Campo Road to the south. During mining operations, no roadways would be closed or hindered, and access would be unchanged within the community. Similar to existing conditions, the site would remain unavailable for pedestrian use during mining activities. Following

reclamation of the site, community infrastructure such as trails would be provided for access to nearby residents. Impacts related to division or isolation of an established community would be less than significant.

- b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Potentially Significant Impact. The project requires approval of a Major Use Permit and Reclamation Plan to allow the proposed mining operations as required by the Zoning Ordinance, Grading Ordinance, and SMARA. Approval of a Major Use Permit requires certain findings to be made pursuant to Section 7358 of the Zoning Ordinance. Making findings for the proposed project will require the review of various goals and policies of the Valle de Oro Community Plan and General Plan, County ordinances and Board of Supervisors' Policies.

The site is currently designated as Open Space (Recreation) in the County General Plan and Valle de Oro Community Plan. No General Plan Amendment, Specific Plan Amendment, or rezone is proposed or required as part of the project, as the project would remain as open space following mining operations. The site is currently zoned as S88 (Specific Plan), S80 (Open Space), and S90 (Holding Area). Extractive use is allowed within the S80 and S90 classifications if the Major Use Permit is approved.

Mining activity would be located within the S90 zone. This zone is intended to prevent isolated or premature land uses from occurring on lands for which adequate public services and facilities are unavailable, or for which the determination of the appropriate zoning regulations is precluded by contemplated or adopted planning proposals or by a lack of economic, demographic, geographic, or other data.

S88 zoning restricts extractive uses to site preparation, which allows the off-site removal of materials when it is secondary to the future use of the site. Within the two parcels zoned as S88, material would be removed from approximately 8.2 acres of the 32 acres (approximately 25 percent) in order to improve the channel; increase the area of native, riparian vegetation footprint; and construct community trails. Portions of the parcels not mined but within the project or Reclamation Plan boundary that are currently used by the golf course, would also be reclaimed and revegetated to a more natural condition. The part of the channel on these parcels is currently a choke point for water as it exits the property and the existing vegetation is dominated by invasive plant species. Expanding the channel at this location and revegetating the area would improve drainage and replace non-native, invasive species with native species. The end use for both parcels would be open space, consistent with the Specific Plan.

Full discussion of compatibility with land use plans, policies, and regulations will be provided in the EIR.

XII. MINERAL RESOURCES – Would the project:

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation No Impact
Incorporated

Less Than Significant Impact. Prior to 2017, the project site had two classifications as determined by the Generalized Mineral Land Classification Map for San Diego County (California Department of Conservation - Division of Mines and Geology 1996). Portions of the site were classified as areas of "Potential Mineral Resource Significance" (MRZ-3) and areas where information indicates that no mineral deposits are present (MRZ-1). However, a California Geological Survey special report reclassified the Cottonwood Golf Course to MRZ-2, which is defined as an area where "adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists" (California Geological Survey 2017).

The project proposes the extraction of aggregate sand, which is a known mineral resource that is of value to the region. The project would extract these resources for local uses, and therefore provides value to the region. Because the project proposes the extraction of the mineral resources as a needed material for various residential, commercial, and industrial uses, the material would not be "lost" for those uses. Therefore, because the project proposes extractive uses, impacts would be less than significant.

- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation No Impact
Incorporated

No Impact. As noted above, the project site is located in an area designated as MRZ-2 by the California Department of Conservation - Division of Mines and Geology. However, the project site is not a delineated mineral resource recovery site on a local general plan, specific plan, or other land use plan. In addition, because the project proposes the extraction of local mineral resources for various uses, the availability of the resources would not be "lost" for those uses. Therefore, the proposed project has no impact.

XIII. NOISE – Would the project result in:

- a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation No Impact
Incorporated

Potentially Significant Impact. The proposed project would generate noise from demolition, grading, excavation, materials handling, processing equipment, and traffic associated with mining and reclamation activities. The project would not, however, involve rock crushing or blasting, which are mining activities that generally produce high noise levels. Noise sensitive land uses (NSLUs) that may be subject to noise generated by the project include residences located immediately adjacent to the southern boundary of the project site and to the north of the site across Willow Glen Drive. The project may expose the residential NSLUs to potentially significant noise levels that exceed the allowable limits of the County Noise Ordinance. The County Noise Ordinance specifies that the one-hour average sound level limit applicable to extractive industries is 75 decibels (dB) at the property line regardless of the zone in which the extractive industry is located.

A Noise Technical Report will be prepared for the project to analyze noise levels associated with the project’s mining activities and its compatibility with the 75-dB threshold. Analysis of noise generating sources and potential mitigation measures (if necessary) will be conducted, to identify potentially significant noise impacts to neighboring residential land uses. The analysis will also evaluate traffic noise levels associated with the project along roadways in the vicinity of the project site. This information will be fully discussed in the EIR.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant Impact. The project does not involve activities generally associated with high levels of vibration, such as blasting or pile driving. Therefore, the project is not anticipated to generate excessive groundborne vibration or groundborne noise levels on site or in the surrounding area.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input checked="" type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant Impact With Mitigation Incorporated. The project may result in an increase in noise levels for 10 years during mining operations. Noise from excavation activities will migrate from west to east across the site over those 10 years as the phased mining progresses. However noise generation associated with aggregate processing and transportation will remain fairly constant to localized areas on and near the project site. All noise generating sources will be evaluated and analyzed in the Noise Technical Report and in the EIR. Following the completion of mining and reclamation activities, the project site would return to an open space use and would not generate noise.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Potentially Significant Impact. The project would result in temporary increases in ambient noise levels during the 10-year mining operation period for the reasons stated above in the response to XII.c). Noise levels associated with mining operations would have the potential to exceed the applicable 75-dB noise limit set forth in the County Noise Ordinance and will therefore be analyzed in a Noise Technical Report, as discussed in Item XII.a, above.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- No Impact

No Impact. The nearest airport to the project site is Gillespie Field, located approximately 6.2 miles to the northwest. The project site is not within a noise contour associated with Gillespie Field (San Diego County Regional Airport Authority 2010). Therefore, the project would not expose people residing or working in the project area to excessive noise levels.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- No Impact

No Impact. The nearest private airstrip to the project site is the helipad associated with the Sharp Grossmont Hospital, located approximately 5.3 miles to the northwest. Based on this distance, the project would not expose people residing or working in the project area to excessive airport-related noise levels.

XIV. POPULATION AND HOUSING – Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Less Than Significant Impact. Growth inducement is a change in physical circumstance or regulatory issues that would remove a restriction to or encourage an increase in human population or development. A project can be determined to have a growth-inducing impact if it directly or indirectly causes economic or population expansion through the removal of obstacles to growth, actions that are sometimes referred to as "growth accommodating."

The project does not propose the development of housing, businesses, or other components that would directly induce population growth. In addition, the nine mining employees that would be required for the project are anticipated to be from the existing population of the surrounding region. Additionally, aggregate mining operations respond to ongoing market demands of the construction industry, rather than creating such demand. Therefore, the project would not induce substantial population growth, and impacts would be less than significant.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact. One residential structure on site would be demolished by the project. This structure is severely dilapidated and is not occupied. Therefore, the project would not displace housing or necessitate the construction of replacement housing. No impact would occur.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact. As noted above, the residence located on site is not occupied; therefore, the project would not displace people or necessitate the construction of replace housing. No impact would occur.

XV. PUBLIC SERVICES

- a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios, response times or other performance objectives for any of the public services:
 - i. Fire protection?
 - ii. Police protection?
 - iii. Schools
 - iv. Parks?

v. Other public facilities?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant Impact. The project site is served by the San Miguel Consolidated Fire Protection District. The closest fire station to the project site, Station 22, is located approximately 0.3 mile to the north near the intersection of Brabham Street and Via Rancho San Diego. Mining operations at the project site are not expected to generate an increased demand for fire protection; the anticipated number of events requiring emergency response is anticipated to be very low. Therefore, the project would not affect fire protection response times or substantially increase demand. The construction of new fire facilities and expansion of existing facilities would not be required to serve the project.

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

The project would not result in the introduction of a temporary or permanent population and would therefore not place increased demand on schools, parks, or other public facilities.

XVI. RECREATION – Would the project:

- a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant Impact. The project would not result in the introduction of a temporary or permanent population and would therefore not place increased demand on parks. The project would result in phased removal of an existing privately-owned golf course, where patrons pay to play. Although golf course closure would result in the loss of a private recreational resource, given the specific nature of the resource, its loss is not anticipated to result in an increased demand on neighborhood or regional parks or other recreational facilities. The potential increased demand on other private golf course facilities is anticipated to be readily accommodated, and would result in the generation of additional revenues for the facilities to offset potential maintenance needs. Therefore, impacts would be less than significant.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant Impact. The project would construct community trails in two parcels in the southeastern corner of the reclamation plan boundary that are included in the Rancho San Diego Specific Plan. Construction of the trails would be performed in conjunction with habitat enhancement activities that would involve improvements to the channel and expansion of riparian vegetation in an area currently dominated by invasive plant species. Construction of the trails is not anticipated to have an adverse effect on the environment; however, all ground disturbing activities proposed by the project will be addressed in the various technical reports for the project and in the EIR.

XVII. TRANSPORTATION/TRAFFIC – Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Potentially Significant Impact. The County of San Diego Guidelines for Determining Significance for Traffic and Transportation (Guidelines) establish measures of effectiveness for the performance of the circulation system. These Guidelines incorporate standards from the County’s General Plan Mobility Element, the County of San Diego Transportation Impact Fee Program, and the Congestion Management Program.

The proposed project is anticipated to generate a total of 176 round trip haul truck trips, 28 employee vehicle trips, and 8 vendor vehicle trips on a given weekday. Trucking operations for material sales would occur during the week from 9:00 am to 3:30 pm to avoid peak traffic periods in the area. No material sales or trucking will occur on weekends. Employee and vendor trips are assumed to occur during commuter peak hours. Because haul trucks have a greater traffic impact than passenger cars due to their size, a passenger car equivalent (PCE) factor of 2.5 will be applied to the daily haul truck trip number. Project traffic would access the project site via the existing driveways along Willow Glen Drive, east of Steele Canyon Road, and a new driveway at the intersection of Willow Glen Drive and Muirfield Drive.

The project-generated increase in ADT may have impacts related to performance measures and measures of effectiveness of the circulation system, as adopted by the County’s General Plan Mobility Element. Project trips would be distributed on Mobility Element roadways in the County, some of which currently operate, or are projected to operate, at inadequate levels of

service. Therefore, the project would have the potential to cause a direct impact related to a conflict with policies establishing measures of the effectiveness for the performance of the circulation system.

The EIR will fully discuss and analyze transportation-related impacts on the effectiveness of the County’s circulation system, and identify appropriate mitigation measures, based on the evaluation presented in a Transportation Impact Analysis report.

- b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Less Than Significant Impact. The designated congestion management agency for the San Diego region is SANDAG. SANDAG is responsible for preparing the Regional Transportation Plan (RTP), of which the Congestion Management Program (CMP) is an element, to monitor transportation system performance, develop programs to address near- and long-term congestion, and better integrate land use and transportation planning decisions. The CMP includes a requirement for enhanced CEQA review applicable to certain large developments that generate an equivalent of 2,400 or more ADT or 200 or more peak hour vehicle trips. Because the proposed project would not generate over 2,400 ADT or 200 peak hour trips, a CMP analysis is not required. Therefore, the project would not conflict with the applicable congestion management program, and impacts would be less than significant.

- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?

Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Less Than Significant Impact. The main compatibility concerns for the protection of airport airspace are related to airspace obstructions (building height, antennas, etc.) and hazards to flight (wildlife attractants, distracting lighting or glare, etc.). The closest airport to the project site is Gillespie Field, located approximately 6.2 miles to the northwest. The project site is not within the Airspace Protection Surfaces, including the Federal Aviation Administration (FAA) Height Notification Boundary or the Part 77 Airspace Surfaces, of Gillespie Field, and is therefore not subject to height restrictions or review. In addition, the project does not involve tall structures or other components that could cause airspace obstructions or hazards to flight. The project would result in no impact to air traffic patterns.

- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact. Access to the project site would be provided via driveways in western and eastern portions of the project site along Willow Glen Drive. In the eastern portion of the site, the two driveways and parking lot near the existing clubhouse would be modified to allow for safe and effective ingress and egress for vehicles associated with the project and ongoing golf activities during Phases I and II. The western driveway and parking area would be limited to use by the mining and processing operations, while the eastern driveway and parking areas would be limited to golf activities. The western parking area would include a looped haul-truck access road that would allow for efficient haul truck movements and avoid vehicle stacking within Willow Glen Drive.

A second access point for mining-related activities would be constructed at the intersection of Willow Glen Drive and Muirfield Drive to provide access to the western portion of the project site. This second access point is necessary because the bridge along Steele Canyon Road that traverses the project site has a clearance height of 11 feet, which is not sufficient to allow for passage by heavy trucks or off-road equipment. Intersections and driveways in both the eastern and western portions of the project site would be constructed with adequate sight distance. Therefore, the project is not anticipated to substantially increase hazards due to a design feature or incompatible uses.

e) Result in inadequate emergency access?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact. Operation of the project would occur within the project site boundaries and would not involve road closures. Steele Canyon Road, which traverses the project site, would remain functional during project operation. Although the project would generate an increase in on-road traffic in the form of haul trucks and worker commute vehicles, the increase is not expected to substantially disrupt travel along existing roadways in the project area. In addition, the proposed driveways near the existing clubhouse and at the intersection of Willow Glen Drive and Muirfield Drive would allow for sufficient emergency access to both the mining and golfing portions of the project site. Therefore, implementation of the project would not result in inadequate emergency access, and impacts would be less than significant.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact. Bicycle lanes and sidewalks are currently present along Willow Glen Drive and bus stops associated with Metropolitan Transit System bus route 816 are present at the intersection of Willow Glen Drive and Jamacha Road. The project is not anticipated to disrupt these facilities or decrease their performance or safety. The project would not introduce a population to the area and would therefore not increase demand for bicycle, pedestrian, or transit facilities. Impacts would be less than significant.

XVIII. TRIBAL CULTURAL RESOURCES – Would the project:

- a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native tribe, and that is:
 - i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register or historical resources as defined in Public Resources Code section 5020.1(k)?
 - ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Potentially Significant Impact. Numerous archaeological resources have been identified within a one-mile radius of the project site. Based on the cultural sensitivity of the project area, tribal cultural resources may be present on site and may be impacted during grading and excavation activities associated with the project’s mining operations. Therefore, the potential for impacts to tribal cultural resources will be evaluated in a Cultural Resources Survey Report. The County also will provide applicable noticing regarding the opportunity for Native American consultation. This issue will be fully discussed in the EIR.

XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:

- a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant Impact. Wastewater generated by the project would be limited to temporary portable restrooms. Water used for mining operations would remain on site. Upon closure of the golf courses and decommissioning of the club house and associated wastewater-generating facilities, the amount of wastewater generated at the project site would likely decrease. Upon completion of mining and reclamation activities, the portable restrooms

would be removed, and the open space would not generate wastewater. Therefore, the project would not produce wastewater in a manner that would exceed wastewater treatment requirements of the applicable RWQCB; impacts would be less than significant.

- b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

No Impact. As discussed in Item XVII.a, above, the project would not generate a substantial amount of wastewater. In addition, water required for the project's mining operations, including water for material processing operations, dust control, and irrigation, would be provided by on-site groundwater wells. Therefore, the project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, and no impacts would occur.

- c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Less Than Significant Impact. During mining operations, the project would include on-site de-siltation basins that would accommodate runoff and prevent sediment from leaving the site while allowing water to pass through to existing drainage features. The construction of the de-siltation basins is not anticipated to cause significant environmental effects; however, all ground disturbing activities proposed by the project will be addressed in the various technical reports for the project and in the EIR. The project would not require or result in the construction of new off-site storm water drainage facilities or expansion of existing facilities. Impacts are anticipated to be less than significant.

- d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Less Than Significant Impact. Water would be required during the project's mining operations for material processing, dust control, and irrigation. Water usage would depend on production volume, which would vary year-to-year with market demand; however, the project's estimated water usage assumes the maximum annual production of 550,000 tons. Water

usage is estimated at 96 acre-feet annually for this production rate. A single water truck would be required for dust control. Water required to suppress dust from the mining operations is estimated to require 74 acre-feet of water per year. Irrigation of the landscaped earthen berm near the entrance and as supplemental water on revegetated areas is estimated to utilize approximately 54 acre-feet per year. Total water consumption, including evaporation, for the project is estimated at 227 acre-feet per year. Water for processing, dust control, and irrigation would be supplied by onsite groundwater wells.

Eight groundwater wells on the property currently provide irrigation water for the golf courses on the property. These wells would be used to provide water for the mining operation. Existing use of groundwater by the golf courses has been estimated at approximately 702 acre-feet per year based on pump ratings and irrigation schedules. Mining operations would substantially reduce this groundwater use. In addition, the project's water requirement would be limited to the 10-year mining operation period. Upon completion of mining activities, the project would discontinue extracting water from the on-site wells. Therefore, sufficient water supplies are available to serve the project, and no new entitlements are needed.

- e) Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Less Than Significant Impact. As discussed in Item XVII.a, above, the project would not generate a substantial amount of wastewater and would therefore not result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the project's demand. Impacts would be less than significant.

- f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Less Than Significant Impact. Solid waste generated by the project would include limited domestic refuse generated during the 10-year mining operation period and additional two years for final reclamation and revegetation. The amount of domestic refuse generated by nine employees would be minimal. Vegetative waste would be properly diverted to a green waste facility in accordance with the County Solid Waste Ordinance. Material extracted from the site not designated as saleable product would be utilized as backfill. Therefore, the project would not generate substantial amount of solid waste and there is sufficient existing permitted solid waste capacity to accommodate the project's solid waste disposal needs.

- g) Comply with federal, state, and local statutes and regulations related to solid waste?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less than Significant Impact. Implementation of the project would generate minimal solid waste. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440 et seq.). The project would deposit all solid waste at a permitted solid waste facility and would comply with Federal, State, and local statutes and regulations related to solid waste.

XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Potentially Significant: The project site is located within a State Responsibility Area and contains lands classified as moderate to very high fire hazard severity zones. The EIR will contain analysis as to whether operation of the proposed project may impair an adopted emergency response plan or evacuation plan.

- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentration from a wildfire or the uncontrolled spread of a wildfire?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input checked="" type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant With Mitigation Incorporated: The project would not contain project occupants that could be exposed to pollutant concentrations from a wildfire. However, the project EIR will evaluate whether the project could exacerbate wildfire risks that could expose surrounding occupants to pollutant concentrations from a wildfire and propose mitigation measures as necessary.

- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact: The project will not require installation of new infrastructure that would exacerbate wildfire risk.

- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Potentially Significant Impact: See questions e, f, j, and k above under Hydrology and Water Quality.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

- a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Potentially Significant Impact. Per the instructions for evaluating environmental impacts in this Initial Study, the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were considered in the response to each question in sections IV and V of this form. These responses indicated the potential for impacts to biological and cultural resources from excavation and grading activities associated with mining operations. These issues will be analyzed in a Biological Resources Technical Report and a Cultural Resources Survey Report and fully discussed in the EIR.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Potentially Significant Impact. The project may have potentially cumulative impacts related to biological and cultural resources, air quality, greenhouse gas emissions and transportation/traffic. The respective technical reports and EIR will include and discussion of project’s potential to contribute to any cumulative impacts.

- c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input checked="" type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Potentially Significant Impact. In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in the response to certain questions in sections I. Aesthetics, III. Air Quality, VI. Geology and Soils, VIII. Hazards and Hazardous Materials, IX Hydrology and Water Quality XII. Noise, XIII. Population and Housing, and XVI. Transportation and Traffic. As a result of this evaluation, there were determined to be potentially significant effects related to these resource areas. Substantial adverse effects on human beings will be fully analyzed and discussed in the EIR.

XX. ATTACHMENTS

See Notice of Preparation Attachments

XXI. REFERENCES USED IN THE COMPLETION OF THE ENVIRONMENTAL REVIEW UPDATE CHECKLIST FORM

California Department of Conservation. 2015. California Geological Survey Regulation Maps. <http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps>.

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California Department of Forestry and Fire Protection. 2007. Fire Hazard Severity Zones in a State Responsibility Area, San Diego County. November 7.

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California Environmental Quality Act, 2018 CEQA Guidelines.

County of San Diego. 2010. County of San Diego Guidelines for Determining Significance – Biological Resources. Fourth Revision.

http://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/Biological_Guidelines.pdf

County of San Diego. 2011. General Plan. August.

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GEOCON Incorporated. 2019. Soil and Geologic Reconnaissance: Cottonwood Sand Mining Pit, El Cajon, California. January 4, 2019.

Multiple Species Conservation Program County of San Diego Subarea Plan. 1997

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San Diego County Regional Airport Authority. 2010. Gillespie Field Airport Land Use Compatibility Plan. January 25.

State Water Resources Control Board (SWRCB) 2015. Geotracker Database.
<http://geotracker.waterboards.ca.gov/>.