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October 22, 2018

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

VIA ELECTRONIC MAIL ONLY

Subject: **PDS2015-MUP-98-014W2, PDS-2015-RP-15-001, LOG NO. PDS2015-ER-98-14-016B; SCH NO. 2015081025; EL MONTE SAND MINING PROJECT**

Dear Mrs. Stevens:

The Helix Water District ("HWD") has reviewed the above Draft Environmental Impact Report, dated August 2018, and provides the following comments:

Chapter 1.0 Project Description, Location, and Environmental Setting

Section 1.4.2.12 Operational Water Use states in part that:

Water to the project site would be provided by Lakeside Water District through an existing water pipeline and meter on the project site, as shown on the Conceptual Landscape Plan (Appendix W).

HWD Comment:

The project site is located within HWD's service area. As such, use of the existing Lakeside Water District pipeline to bring service to the proposed project would require de-annexation from HWD service area into Lakeside Water District's service area. In addition to HWD and LWD board action, the applicant would be required to process the request through LAFCO.

This comment should be applied in every instance throughout the Draft EIR, where reference is made to water being supplied or proposed to be supplied by Lakeside Water District, including but not limited to: Sections 1.4.2.8; 3.9.1; and 3.9.2.3.

Section 1.6.5 History of the Project Site states in part that:

Well 101, just southwest of the property's western boundary, has delivered an average of 250 acre-feet of water supplies to Helix water treatment facilities since 1950.

HWD Comment:

The 250 acre-feet per year figure is incorrect. HWD well 101 produces on average approximately 100 acre-feet per year.

Chapter 3.4 Hydrology and Water Quality

Section 3.4.2.2 Groundwater Storage/Well Interference concludes no significant environmental effects.

HWD Comment:

To the extent that the proposed project could have negative impacts to the water quality and/or availability of water to HWD's Well 101, such impacts could adversely impact the greater water supply for HWD's service area. Degraded water quality may exceed EPA and SWRCB drinking water standards. Any reduction in water availability from groundwater basin may have negative financial impact to Helix customers due to required increased purchase of water supply from other sources.

Chapter 7.0 List of Mitigation Measures and Environmental Design Considerations

Mitigation for Impact No. BIO-7: Groundwater Resources states that:

Impacts to groundwater shall be mitigated by removing the Helix Water District Well HWD-101 from production, thereby reducing total demand by approximately 250 acre-feet per year and balancing future project demand with annual recharge.

HWD Comment No. 1:

The 250 acre-feet per year figure is incorrect. HWD well 101 produces on average approximately 100 acre-feet per year.

HWD Comment No. 2:

HWD has no plans to remove, abandon, or otherwise discontinue use of its Well 101 at this time. Additionally, it should be noted: with the historical and ongoing draught conditions common to this region, the proposal to shift raw water usage from Well 101 to the proposed project would necessarily deprive other uses of that water. For this reason, HWD does not support an alternative use of Well 101. Any reduction in water availability from groundwater basin may have negative financial impact to Helix customers. HWD's rights to the groundwater in this area are governed by an Agreement with the City of San Diego, dated January 30, 1933.

Appendix C Plot Plan***HWD Comment No. 1:***

Sheet 6 "Easements" should be updated to include the 100' wide HWD easement (Document No. 2017-06-23_2017-0285570). HWD must have access at all times to its facilities installed in this easement. No obstructions will be permitted within the easement area, including, but not limited to vehicular access.

HWD Comment No. 2:

The proposed 20' trail easement crosses the HWD existing 100' wide easement. HWD will need to approve of any joint use of its easement and will require review and authorization for any improvements to be installed within the easement area. HWD must have access at all times to its facilities installed in this easement.

HWD Comment No. 3:

The proposed layout of the project site includes a HWD 36-inch water main within a 100' wide easement granted to HWD. HWD facilities shall be protected in place and there shall be no changes to the easement area, including but not limited to: grading, drainage, water flows, unimpeded accessibility and vehicular ingress/egress 24 hours a day, 7 days a week.

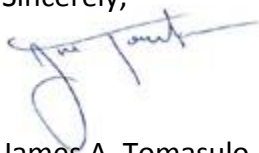
Appendix E Summary of LARA Model Memorandum

On page 3 of the memo under "Required Factors," the author states that instead of groundwater use, "water for processing, dust control, and any irrigation would be supplied by Helix Water District."

HWD Comment:

The project site is located with the Helix Water District service area, however, the applicant would need to seek a Water Availability Letter from the District for its proposed project if it proposes to connect to HWD water service. As there is currently no infrastructure in place to serve the project with HWD water, the owner would be responsible for all costs associated with infrastructure required to bring HWD water to the site.

Sincerely,

A handwritten signature in blue ink, appearing to read "James A. Tomasulo". The signature is stylized with a large initial "J" and a long horizontal stroke extending to the right.

James A. Tomasulo
Director of Engineering