Lakeside's River Park Conservancy

Celebrating and preserving the San Diego River

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

October 29, 2018

Planning and Development Services (PDS)
Project Processing Counter
5510 Overland Avenue, Suite 110
San Diego, CA 92123

Via electronic submission

Comment Subjects and Authors:
CEQA Alternative Analysis, Appendix I Conceptual Revegetation Plan, Appendix X – Noise Impact Analysis, 3.4 Hydrology and Water Quality, 2.2 Air Quality- Robin Rierdan, Executive Director Lakeside's River Park Conservancy

3.7 Recreation – Maryanne Vancio, Form County Trails Coordinator

2.1 Aesthetics - Gary Ruyle, Landscape Architect

Re: **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 Mr. Hingtgen and Ms. Steven:

I submit this comment letter on behalf of Lakeside's River Park Conservancy, a 501 (c)3 public benefit corporation whose *mission is to preserve and restore the biological integrity and beauty of the San Diego River while integrating recreational, educational, and cultural opportunities for our region*.

Founded in 2001, we have restored over 145 acres of the San Diego River that were former sand mines. As such, that experience gives us, real, on the ground understanding as to how this project will impact and species and restoration in particular.

The project is the largest mine ever proposed for the San Diego River, larger than the mines in Mission Valley, and the existing Superior Mine on Mission Gorge Road in the city of San Diego.

The purpose of this letter and the letters attached is to provide comments on the Draft Supplemental Environmental Impact Report (SEIR) for the El Monte Valley sand mine. For the reasons below, the Draft SEIR for the Project does not adequately describe the Project and fails to analyze the significant environmental impacts of the Project. Additionally, the project does not propose adequate mitigation measures or alternatives to address those impacts. It is necessary that the DRAFT SEIR must be revised to permit the public and the community of Lakeside an adequate understanding of the environmental impacts of this project.

El Monte Sand Mining Project (Project) Draft SEIR (SEIR) fails to adequately describe the impacts that may occur on the biological environment and the mitigation necessary to reduce such impacts to a less than significant level as required by the California Environmental Quality Act (CEQA), Public Resources Code § 21000 et seq. and California Code of Regulations, title 14, § 15000 et seq. (CEQA Guidelines). As a result, neither the public nor the County are provided sufficient information to complete a meaningful review of the project and its potential effects on the environment. The environmental document must, therefore, be revised and re-circulated to allow for such meaningful review and opportunity to comment.

Existing Grading Permit and Grading Violation

This SEIR does not adequately explore the legal status of the existing Grading permit, held by the Helix Water District for a golf course project on land leased to the El Monte Nature Preserve LLC for failure to complete the grading plan in 2010. El Monte Nature Preserve LLC is the successor in interest to the El Capitan Golf Course LLC who had a leasehold from Helix Water District for the development of two 18-hole golf courses in the El Monte Valley on this site. An email from the County of San Diego states:

*"**From:** Bennett, Jim[Jim.Bennett@sdcounty.ca.gov]*
***Sent:** Thursday, December 16, 2010 3:58 PM*
***To:** Tim Smith*
Cc: Beddow, Donna; Carlos Lugo
***Subject:** FW: P10-024, RP10-001 El Monte Sand Mine, Grading Violation L14105*
***Expires:** Sunday, December 13, 2020 12:00 AM*
"DPW said that at a minimum, a new grading permit would be required to be submitted. The grading permit could go through a plan change to not include the grading for the golf course. The plans could include what was already graded and address any steep slopes that need to be remedied, stockpiles that need to be compacted, and revegetation that would be necessary to stabilize areas that have been graded. If you wanted to assume responsibility for the grading plan, you would need to sign a change of ownership agreement form for you take over the grading permit. David Fleming should contact DPW as soon as possible to work with them on coming in for a new permit.

DPW further indicated that if David Fleming decides not to take action as recommended in the letter, DPW may begin citations with fines, and could eventually cite Helix Water District as owner of the property if no action is taken."

The El Monte Nature Preserve LLC graded the site, illegally mined 450,000 cubic yards of sand over 12 acres, leaving the land scared. Nothing has been done to remediate this damage or address the issue of the grading violation over the course of the subsequent years. As such this grading violation needs to be considered in the Draft SEIR and a fulsome discussion of the condition of the land graded, the illegal sand mining be examined and a plan developed and implemented to remediate this matter before any plan for a sand mine move forward.

CEQA Alternative Analysis

The alternative analysis does not consider the illegal sand mining under existing permit P10-024, RP10-001 El Monte Sand Mine, Grading Violation L14105. The land was left stripped of its topsoil, and a huge pit was left without any remediation. Given that this activity was not allowed under the golf grading permit, the illegal sand mining should be considered as a CEQA alternative.

Segmentation of the Project -Moreover, when you look at the area that is the proposed mining area, you will see that they do not proposed to mine or restore the area east of Dairy Mart Road. That was the area that was 'graded' and then sand mined, and its topsoil was hauled away to Hanson Pond during the golf course period. With the exception of the former sand mining pit of 12 acres, which will be filled with fines and planted hat area has been strategically left off the restoration plan. CEQA does not allow for the segmentation of a project. That portion of the site, is either intended for future sand mining or restoration as part of a commercial mitigation bank project. Either way, its final disposition must be considered in this CEQA document. Please address this matter.

APPENDIX I CONCEPTUAL REVEGETATION PLAN

The existing site is part of a rare alluvial habitat, in that it fosters and supports a unique and diverse assemblage of species with particular attention to herps. The SEIR describes a revegetation plant that includes planting the slopes of the sand mining pit with coastal sage scrub, and a variety of riparian habitats at the base of the pit.

Showing successful revegetation in the front and poor revegetation in the sand substrate in the distance.

Perched site with failing riparian forest mitigation at Mission Trails for Hwy 52 Caltrans project.

Lakeside's River Park Conservancy is an organization, which has completed a variety of revegetation plans on two large former sand mining sites in Lakeside along the San Diego River. Based on our experience with restoration in the El Monte at a site next door to the proposed mining site, it is clear to us that this plan for revegetation of the site will not succeed. The restoration project next door, the Hanson El Monte Pond site has had great success in reveging the site over large swaths of the project acreage. However, there are several areas within the site where the revegetation is failing. The areas that failed replicate the restoration conditions that the sand mine will leave as each phase of mining is completed. The failed sites are representative of the kind of planting conditions that will occur on the mining sites. Without

question, **the plantings on the Hanson El Monte Pond site will fail where they are planted in sand**. Sand is the determining factor.

From LRPC's experience, no amount of soil amendment, from products like DriWater to organic soil amendment has changed the outcome for species planted in that substrate. The reason being is that sand will desiccate a plant almost immediately. Whether the plant is grown on a flat surface or on a slope, the porosity of the sand allows for no residence time of the water. Basically, the water simply runs back into the groundwater as fast as it can be poured on and provides little to no benefit to the plant. No amount of overhead watering will change this situation. Overhead watering will however, provide sufficient water to germinate hardier invasive grasses, weeds and tamarisk. We have used hand watering. We attempt to create a basin that will hold 2.5 gallons of water and then hand-water the establishing plants once a week. The basins fail because the sand won't hold together. The slopes fail because, the sand will not tolerate the weight of a human. We have to use rows of straw wattles on these slopes to: 1) stop erosion on these slopes, and 2) to hold enough sand in place to keep the plants in place so as to not to slip down the slope. This system works quite well on native soils as can be seen in the majority of the Hanson Pond site. IT DOES NOT WORK IN SAND. Above is photographic evidence of difference in plant growth, the delta factor is planting in sand.

The picture above shows plants a very dense and lush amount of growth on the plants on the nearest slope. In the background, are plants, planted at the very same time, but planted in sand. They are struggling. Over the course of their growth, they have received far more attention in the form of water, soil amendments, but they are barely surviving.

The other issue that is not adequately addressed in the Revegetation Plan is the variability of the ground water level. Our experience with Hanson Pond shows that pond levels, i.e. groundwater levels very 4 feet over the course of the year and the trend has been downward, each year getting progressively lower.

The picture above shows a failed mitigation site constructed by Caltrans at the Mast Blvd exit at Mission Trails. This is a grove of struggling cottonwoods, its understory has been reduce to a monoculture and the trees themselves are sparsely leafed out. This is a project that got the hydrology wrong. Essentially Caltrans designed their mitigation area for 2 feet from the water table. Between a shifting berm that doesn't allow water/nutrient transport to move onto the site and the issues of drought predicted by climate change scenarios, this grove of cottonwoods is lingering and will probably fail completely in the next drought cycle. The plan proposed for the restoration of the bottom of the sand pit makes no allowances for climate change and significant variability in the ground water levels. Even in good rain years, the water table drops at least 4 feet, judging from the pond levels at Hanson El Monte Pond of the course of the year. There is reason that the phreatophyte tamarisk has been so successful in colonizing the channel carved out by Nelson and Sloan sand mining in the late 1990's. They are far better at following the ground water levels down than even the most water-philic cottonwood.

This plan also makes use of a portion of the damage done to the site when the project applicant (El Capitan Golf Course LLC now successor in interest, El Monte Valley Nature Preserve LLC) graded the project for the golf course on the east end near Dairy Mart Road. All of the topsoil was stripped off. It was not stored on site for future use by the golf course. It was hauled to the Hanson El Monte Pond site, where portions of it were sold and a portion remains. The revegetation plan for the sand mine site does not address the damage done by the grading and illegal sand mining. In fact the revegetation specifically excludes the degraded area left by the grading for the golf course at the eastern end of the project site. The project needs to address this issue. The Draft EIR only acknowledges this matter in the most peripheral manner in the form of a footnote referenced below.

Page 33 – Note 8 - Grading in 2005 from the previously approved golf course project that was halted temporarily impacted 0.18 acre of disturbed riparian scrub (tamarisk scrub). The planned golf course cart path crossing of the river associated with this grading was not ultimately constructed. This is the only impact to a sensitive vegetation community outside of the planned mine project footprint that requires mitigation. This riparian habitat shall be mitigated at a 3:1 replacement ratio in accordance with the County's Guidelines for Determining Significance for Biological Resources (September 2010) by conducting 0.54 acre of southern willow scrub restoration in mining Phase 1. The golf course mitigation will occur where mine project riparian scrub reclamation would have occurred, therefore, overall planned reclamation will be reduced by 0.54 acre and riparian habitat reclamation will total 46.24 acres instead of 46.78 acres.

Lastly, please note that the plan does not speak to the issue of the damage done to the eastern portion of the site when the plan was to create a 'golf course.' The plan for this area needs to be described in this Draft SEIR. Is this the site of future mining? Is this the site of a for profit mitigation bank? CEQA law does not allow for segmentation of a project. Until this portion of the project is adequately described in the CEQA document, the public has no information as to its eventual disposition.

NOISE - APPENDIX T - NOISE IMPACT ANALYSIS

This site in the El Monte Valley was included in the San Diego Region Aggregate Supply Study 2011 funded by the San Diego Association of Governments (Sandag). In this study, the El Monte Valley is listed as a potential source of high quality sand of over 100 acres. The site was eliminated from this analysis early in their surveys because the site is too close to residential areas. "A 1,300-foot setback from residential areas is considered in the County of San Diego's mineral resource evaluation methodology guidelines to mitigate noise.3" page 7-16. This 1300 foot setback needs to be employed in the Draft SEIR analysis of the sand mine and its operations.

3 County of San Diego, Department of Planning and Land Use, Department of Public Works. (2007). County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Mineral Resources.

There is no separate discussion of noise in the EIR, only a technical appendix is included. This failing needs to be addressed. Noise from the site is a cause of concern from the surrounding areas, however, noise has an equally deleterious impact on wildlife and particularly sensitive species, such as the Least Bell's vireo and California gnatcatcher, which are present on the site. The existing analysis is as inadequate for the surrounding residential areas as it is for wildlife.

Although it appears that the consultant applied the standard methods to assess noise as prescribed by the County of San Diego, that of single direct transmission path in non-complex terrain, that methodology does not meet the special characteristics of the El Monte Valley. The Valley is a long and narrow valley bracketed to the north and south by close, high valley walls. This configuration of the valley is not well suited to the County of San Diego's Noise assessment methodology. That methodology assumes a two-dimensional component to noise, akin to a line of sight. Because of the nearness, the steepness and the height of the valley walls, this method of determining noise at different distances is not accurate.

There are numerous instances where valley residents say they can hear and understand distinct conversations as much as 500 feet away from the source. In fact no interviews of local residents or the residents who live above the valley in Blossom Valley were performed to assess how they perceive sound in the valley. That information would have helped inform the locations of the noise meters as well as allowed the consultant to gain a greater understanding of the requirements of the noise model.

The acoustics of the valley are more in line with a concert hall than a flat plain. Consequently, a more sophisticated system of acoustic modeling that can address the complexities of sound in the valley should be required. A model such as the Lagrangian sound particle model using a meshfree approach considers complex terrain and meteorological fields, which are consistent with that terrain. Meshfree particle method, which is always regarded as a pure Lagrangian approach, is easily represented complicated domain topologies, moving boundaries, and multiphase media. Solving acoustic problems with the meshfree particle method forms a branch of the acoustic wave modeling.

This level of acoustic analysis can be implemented when the project proponent completes the necessary 3-d high definition aerial study or a lidar study of the valley and the topology of the surrounding valley walls.

Only when that analysis is completed, can the noise impact to humans and wildlife be accurately and adequately assessed.

Please complete the necessary sound studies that would allow the community to accurately assess the noise impacts of the project.

3.4 Hydrology and Water Quality

With regard to water quality, we find that the EIR does not address or examine the following

matters:

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

   Santee-El Monte Basin is included within the San Diego Hydrologic Unit. One of the beneficial uses designated for the basin in the San Diego Basin Plan is "MUN". The "MUN" beneficial use includes uses of water for community, military, or individual water supply systems including, but not limited to, drinking water supply. The proposed project would excavate and process minerals from approximately 240 acres within the basin to a depth of 30-40 feet over the course of 12 years. The EIR needs to evaluate how the proposed project would affect this crucial source of drinking water and ensure that it will not be diminished, particularly in the midst of the ongoing state of drought.

   Indeed, "The Santee-El Monte Groundwater Basin is currently used as a source of groundwater by local residents, and the Helix Water District, Lakeside Water District and historically used as a source of groundwater by the City of San Diego. Local water agencies, including the City of San Diego, are currently evaluating the potential for additional development and management of the resources of the Santee-EI Monte Groundwater Basin." (See, Bondy and Huntley (2001) Groundwater Management Planning Study Santee- El Monte Basin, Phase III Report for the San Diego County Water Authority.) The City of San Diego has long proclaimed to hold pueblo water rights in this resource to meet drinking water needs of the city. The effects of the proposed project on this valuable public drinking water resource has not been carefully evaluated in the Draft SEIR and closely coordination with water rights users;

b. Article 10, Section 2 of the California Constitution requires that, "... the waste or unreasonable use or unreasonable method of use of water be prevented", and that the "conservation of such waters is to be exercised with a view to the reasonable and beneficial use thereof in the interest of the people and for the public welfare...." The public welfare requires that sources of drinking water be preserved for the benefit of all Californians in the face of the existing water emergency. The Draft SEIR did not evaluate the effects of the proposed project on the basin and whether such effects are reasonable within the meaning of the California Constitution, whether the proposed project unlawfully impairs existing water rights, and whether the proposed project is in the interest of the people and for the public welfare;

c. Water Code section 13241 requires that water quality objectives be established to ensure the reasonable protection of beneficial uses and the prevention of nuisance and that water quality objectives not be set at a level that would permit water quality to change to such a degree that designated beneficial uses (i.e., MUN) are unreasonably affected. (San Diego Basin Plan 3-1.) The Draft SEIR did not evaluate whether the proposed project would

violate water quality objectives necessary for the reasonable protection of the MUN beneficial use in the Santee-El Monte Basin. Potential effects on water quality include, without limitation, changed groundwater levels, increased TDS, decreased pH and increased arsenic and metals concentrations due to mineral extraction and processing, increases in nutrients from algae growth and water foul use in open ponds, and siltation of surface waters during storm events.

d. The Draft SEIR did not evaluate whether the proposed project will affect groundwater hydrology in the El Monte valley and impact downstream water tables and surface waters. The Draft SEIR does not consider the level of communication between various upstream and down stream reaches of the aquifer. For example, Lindo Lake is well dependent. How far does the ground water aquifer originating in the Santee-El Monte Basin extend? How does water use/impacts during extraction effect the ground water level? How does evaporation affect the water table? Will fluctuations in the water table impact existing vegetation both upstream and downstream of the project site which are dependent on ground water?;

e. The Conservancy has received grants, secured permits for, and is engaged in competitive bidding for restoration of portions of Hanson El Monte Pond through the creation of emergent wetlands and improved flood control. The Draft SEIR does not analyze how the proposed project will affect the Conservancy's restoration and flood control project.

    i. How does the project affect both short-term and long-term water levels in the pond?

    ii. (2) How does the phases of the proposed project, in particular Phase 4, adjacent to the Conservancy's restoration project area affect newly established aquatic and upland habitat plantings and wildlife inhabiting or using such areas, such as, nesting migratory and/or endangered or threatened birds? Potential environmental effects requiring analysis in the EIR include, without limitation, those effects resulting from:

        (i) Noise and vibration from mining operations and truck traffic;

        (ii) Dust from mining operations and truck traffic;

        (iii) Changes in groundwater levels and water quality; and,

        (iv) Edges effects

f. How will storm water discharges from the mining site (including the extraction pit) be managed to prevent pollution of surface waters? How will stormwater discharges be directed to the river channel?

g. Does the extraction activities only remove portland cement grade aggregate or will heavier stones and rocks also be encountered? What will the disposition of these heavier materials be? Will such materials be crushed and further processed?

   Please discuss whether the drop structure as proposed meets applicable engineering standards for its intended purpose. The drop structure is intended to keep flood flows from head cutting up the valley. Please study the 100 and 200 year flood year flows as well as anticipate dam failure. The Draft EIR does not examine flooding and dam integrity in light of climate change. Virtually all Global Climate Change Models show that California, and San Diego in particular, will experience warmer and drier winters punctuated by massive El Nino events.

h. How does the drop structure proposed for the project affect hydrology and water quality in the Santee-El Monte Basin during and after construction of the structure? Is there be effects on the water table and aquifer?

i. Does dewatering be required at any time for the proposed project? If so, how will the removed water be managed?

j. Alluvial sand in El Monte Valley both stores and purifies stormwater entering the valley. How does removal of the sand by the proposed project affect water quality downstream? How does stormwater flows be affected with the loss of the retention effect of the sand?

k. How much long term storage capacity will be lost in the Santee/El Monte aquifer with the implementation of the project? The Santee/El Monte aquifer can be considered a large sponge that captures water, holds it, and releases it slowly over many years either through well pumping or through down gradient flow. The sand mine will put a significant 'hole' in that sponge. A significant number of acre-feet of water will not be held in the sand structure with the mining pit. That storage will be lost. It amounts to a significant amount of important and needed water in a period of climate change where San Diego is predicted to endure increasing long droughts punctuated by a large El Nino year. It has been designated for thorough evaluation as a source of water for San Diego.

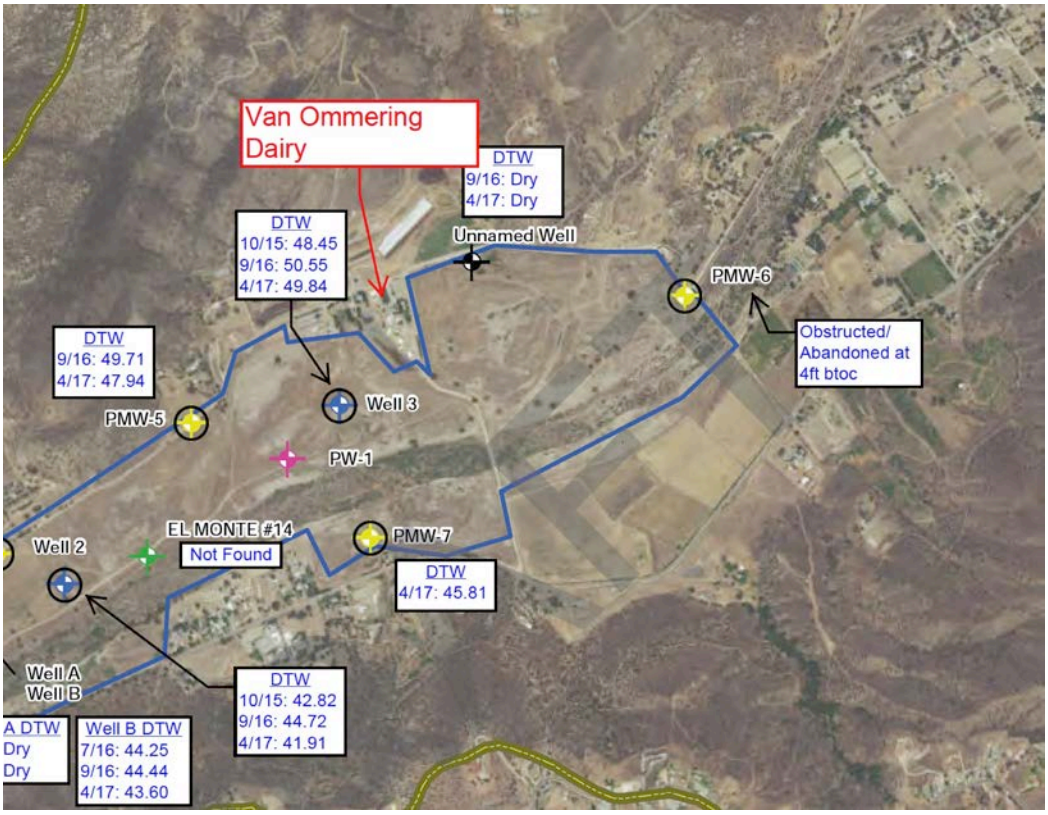
l. Watering the site three times a day is not an effective method to mange from the project avoid air and/or water pollution?

m. What are the be effects on the water table and aquifer via the construction of the drop structure? What will be the effects if the drop structure fails at any time (e.g., during a 100-year flood event or when water spills from El Capitan Dam)?

Dairy Operations and Nitrates - The issue of water quality was not analyzed for the near presence of nitrate mounding under Van Ommering Dairy and Fosters Dairy (legacy) as well as another dairy just up gradient. That dairy has been in continuous operation since 1959, nearly

60 years. Although the size of the dairy herd has varied in the intervening years, nitrates have been discharged under the dairy and into the El Monte Valley alluvium in the form of manure and urine. The average cow produces 3.5 gal. (13.2 liters) daily. Manure - A cow produces 65 lbs. (29.5 kg) of feces or manure daily - that's 12 tons (908 kg) a year.

One of the issues associated with this ground discharge of animal waste is the issue of pollutant mounding under the site. Mounding is where there is a local aggregation, literally a mound of pollutant directly under the groundwater pollutant source. This mounding is seen in the nitrate numbers that are found in Well 3. This issue is explored in *Characterizing Sources of Nitrate Leaching from an Irrigated Dairy Farm in Merced County, California* Martin L. van der Schansa et al. Pubmed.gov 2009



The table below characterizes the nitrate levels at Well 3 at 10 ppm. This is just at the legal limit for drinking water.

Mounding is generally a fairly stable feature in groundwater unless it is perturbed by

4.3 Water Quality

In August 2016, AECOM collected water samples from Wells 1, 2, and 3 and analyzed for nitrate (as nitrogen [N]) and total dissolved solids (TDS). In addition, we obtained water quality data from one of the El Monte Regional Park supply wells. Sample results relative to the Primary State or Federal Maximum Contaminant Levels (MCLs) are summarized in Table 6.

Table 6. Summary of TDS and Nitrate Analytical Results – September 2016

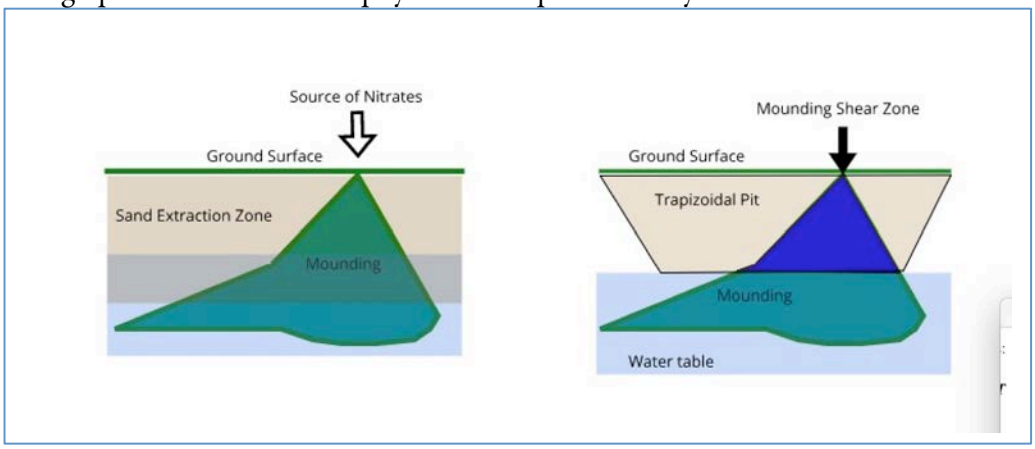
Well	Analytical Results	
	TDS (mg/L)	Nitrate (mg/L as N)
Primary MCL	**1000**	**10**
County of San Diego El Monte Regional Park Well	N/A	2.5*
Well 1	350	0.21
Well 2	550	6.0
Well 3	500	10

Notes: * Well sampled April 18, 2016 by County of San Diego

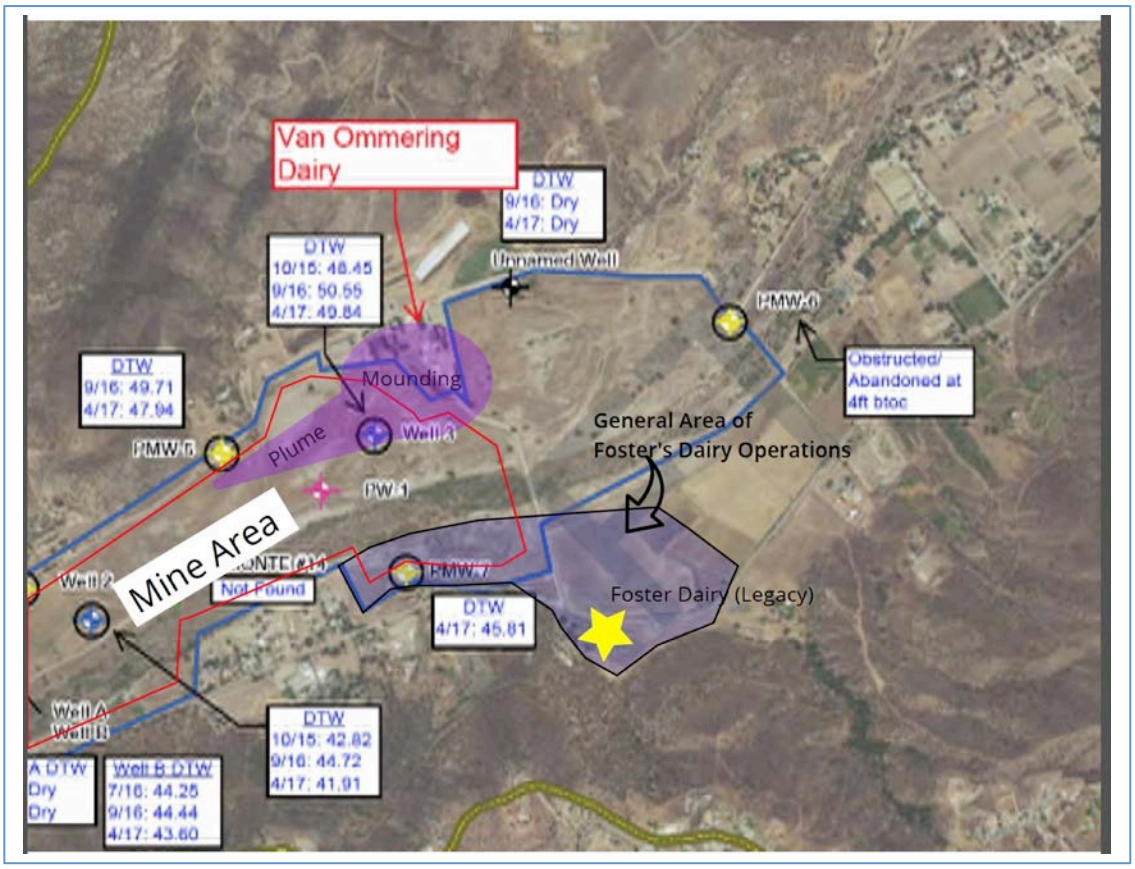
Bondy and Huntley (2001) reviewed TDS data sourced from the U.S. Geological Survey from 1959 and 1983 (Figures 25 and 26 below, referenced from Bondy and Huntley [2001]). Those results indicate TDS concentrations of 290 to 1310 mg/L in the El Monte Basin.

excessive pumping that will pull the mounding into a plume or by another activity. The existing groundwater and sand hold it in place and it only flows at the same rate as the groundwater it is in. However, the mine will be coming very close to the mound if not shearing into it. The portion of the mound that is held in place by the unsaturated zone, will then be able to flow down into the pit, increasing the concentration of nitrates in the groundwater just below the level of the pit. Essentially all of the mound that is above the ground water level will flow into the pit.

The graphic below shows the physics of this process in layman's terms.



The map below shows the anticipated location of this nitrate mound. Given the high nitrate values for Well 3, further investigation must be undertaken to ascertain the location of this nitrate mound and its concentration to protect the groundwater quality in the valley. There is also anecdotal evidence from down gradient residential wells that a nitrate plume from the dairy exists. No effort was made to find the source of this nitrate at Well 3.



This issue of water quality is critically important to the Pueblo Water Rights held by the City of San Diego as well as all of the down gradient users of potable water and perhaps even to the Lakeside Water District well field. This district also owns wells that are farther west of the project site, near Wintergarden Road. These wells have been shut down due to the presence of nitrates in the water. Although source studies have not been undertaken, it is believed that the source was a variety of legacy Ag uses in the area over the past 100 years, but most importantly, the presence of Rocky Home Dairy, that used to be just up Wintergardens Blvd, just up gradient.

The Draft SEIR needs to re address this issue to ensure that water quality in both the Santee El Monte Aquifer and in all of the potable wells in the valley are not contaminated with nitrates.

Cobey-Alquist Flood Plain Management Act as defined by section CA Water Code § 8410 (2013)

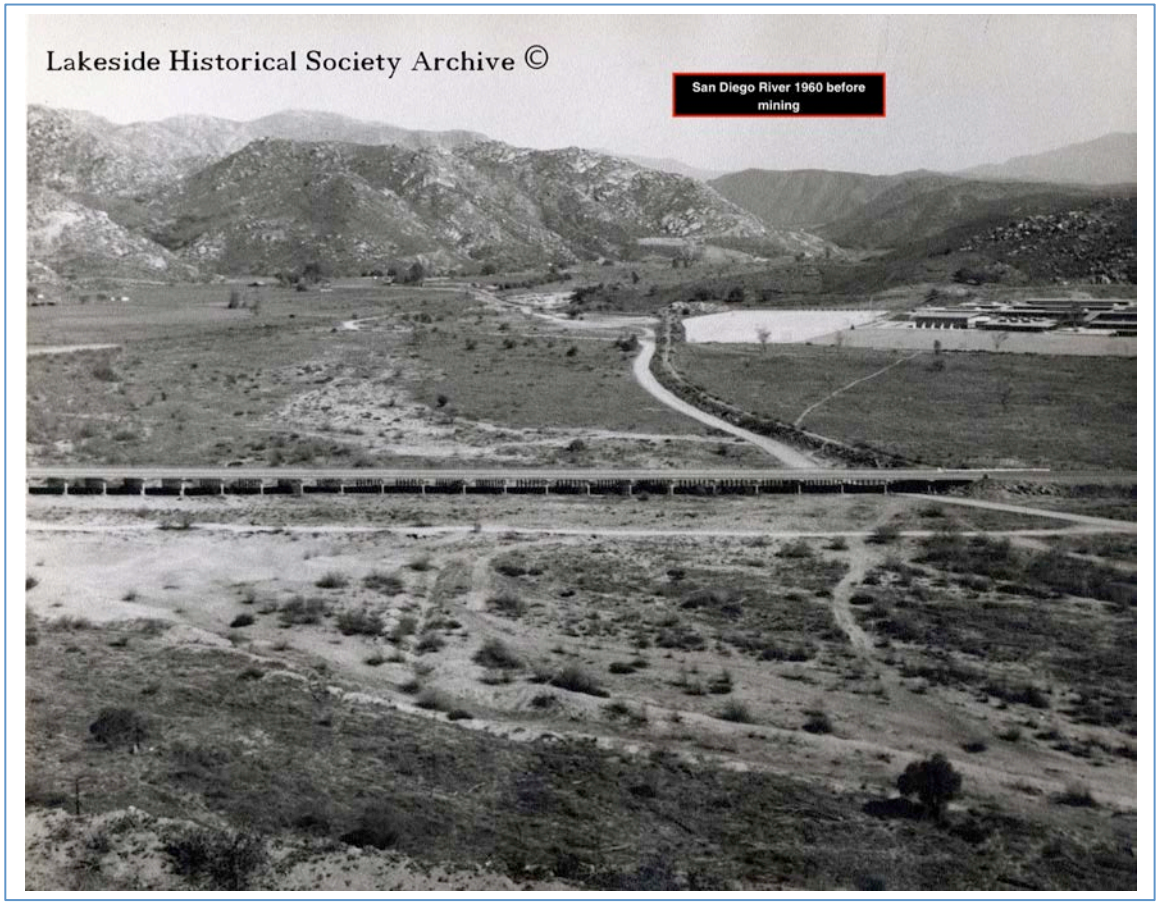
The Draft SEIR does not fully characterize the risk to life and property by the proposed project under the *Cobey-Alquist Flood Plain Management Act* as defined by section CA Water Code § 8410 (2013), which states:

(a) Construction of structures in the designated floodway, which may endanger life or significantly restrict the carrying capacity of the designated floodway shall be prohibited. For the purpose of this subdivision, the word structures does not include public utility electric, gas, or communication lines which may be located within the designated floodway; provided, that any permit or permits as may be required by law, other than this chapter, to so locate such lines have been granted.

(b) Developments shall be permitted within the restrictive zone in accordance with local agency policy, giving full consideration to the protection of human life and the carrying capacity of the flood plain.

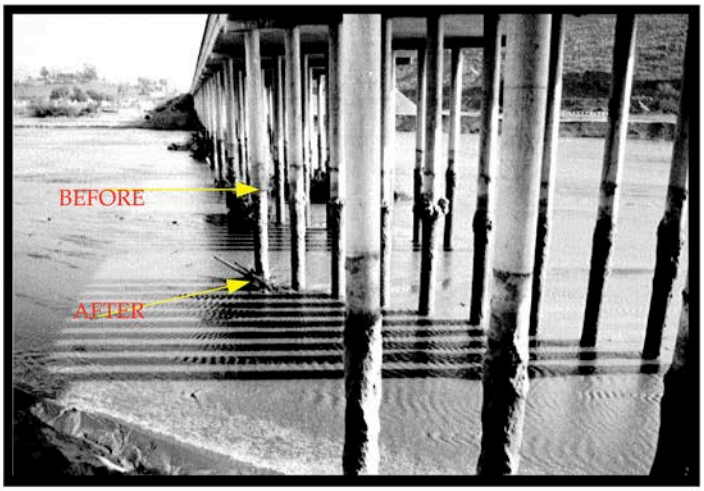
Lakeside has a history of flooding and flooding has been significant from 1915-1916 when the river produced flood levels of 70,200 cubic feet per second to 1997-1998 when flood levels were achieved at 5,300. (Source USGS and National Weather Service)

Since mining of the river began in the1970's floods in Lakeside have exacerbated scour and



damage to the structures particularly the Hwy 67 Bridge over the San Diego River.

The large and deep sand mining pits had a catastrophic impact on Lakeside, particularly the Hwy 67 Bridge as it crosses the San Diego River. During 1977-1978 rain season and then again in 1981-1982 rain season, the dam over spilled generating 3010 and 2900 cubic feet per second of flow respectively. The damage caused to Lakeside is depicted in the photographs below.



The flood of 1978 severly exposed and weakened the pilings of the old highway 67 bridge over the San Diego River.

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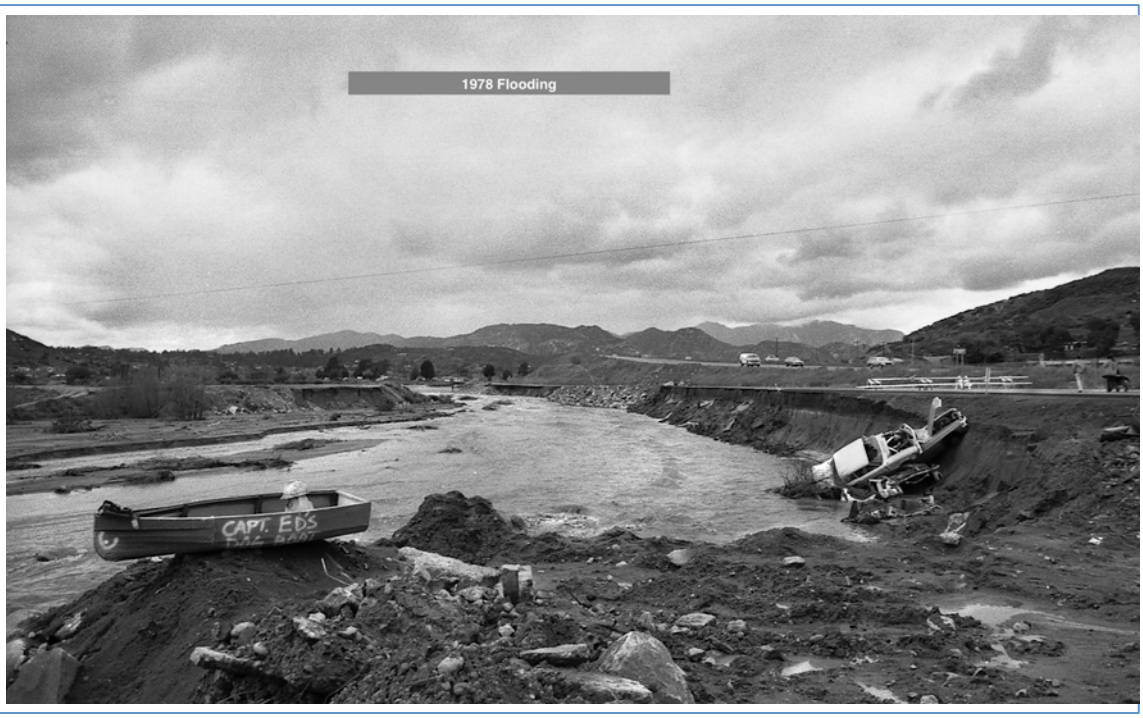

The Department of Water Resources Flood Protection Corridor Program has provided Lakeside's River Park Conservancy with nearly $10 million in grants to remediate sand pits in the San Diego River. They understand full well that these pits, with their attendant pit capture and down stream scour issues pose a threat to both life and property. The remediation for these pits has been to fill them. To date, Lakeside's River Park Conservancy has partially filled 3 ponds, a 7-acre pond, a 3-acre pond and a 40-acre pond with inert fill using money from the Flood Protection Corridor Program funded by Prop 13 and Prop 84. The El Monte Sand Mine is the largest pit ever proposed, over 240 acres. It will also be the deepest pit along the San Diego River in Lakeside going down to 40 feet. It will also be the longest pit, nearly 1.8 miles in length ever proposed in the San Diego River. This pit is located approximately 3.5 miles from the El Capitan Dam spillway.

When the dam spills, the water flows into a narrow canyon before it empties into a slightly broader alluvial plain that will become the sand mine. Even in this reach of the river, the narrowness of the valley will not allow the water to spread out and slow down. It will bring its sediment load into the pit, drop it in the pit and continue at flood stage down stream scouring nearby bridges and other municipal structures.

Additionally, the model employed to analyze sediment transport used in the EIR did not adequately consider the inputs of tributary streams coming into the valley.

"One common source of uncertainty in mobile-bed sediment transport modeling of a river is lateral sediment volumes delivered by tributaries. The uncertainty and error associated with tributary sediment loads is much larger for ephemeral non-armored tributaries as compared to perennial armor-bed systems. Many of the rivers in the western United States, especially in the

southwest and central plains, have ephemeral tributaries, which can be significant sources of sediment for the main stem river. This is especially true in situations where an upstream dam cuts off main stem sediment loads. These tributary sediment loads are very important for sediment management and river restoration purposes, and are often poorly estimated and can involve order of magnitude errors in their quantification (Reid and Laronne, 1995).

Current methods to estimate sediment transport involve estimating either: (1) the sediment supply or (2) the sediment capacity. Sediment supply estimates are usually of the Universal Soil Loss Equation types (USLE, MUSLE, RUSLE) and are understood to include significant uncertainties. Sediment transport capacity is typically estimated using a transport equation, which can be effective when the appropriate equation is selected to match the specific conditions. However, nearly all transport equations have been developed based on the energy in perennial systems, and bed load flux in an ephemeral channel has been shown to be "several orders of magnitude higher than maxima measured at similar levels of stream power in perennial counterparts" (Reid and Laronne, 1995). It is imperative that stream restoration studies, sediment management actions, and reservoir sedimentation studies conducted by or for Reclamation include tributary sediment estimates that are more accurate than what is currently being used." **Ephemeral Tributary Sediment Loads** (final, PDF, 189KB) *By David Varyu Report completed on September 30, 2013*

The issue of pit capture down stream, the issue of tributary sediment in an ephemeral stream has not been adequately investigated. This matter will impact the near down stream urban areas and also impact the amount of sand, (always in short supply) reaching the beach at Mission Bay and Ocean Beach in the city of San Diego. Further research and investigation is required to adequately inform the community of the threats to life and property per *Cobey-Alquist Flood Plain Management Act.*

2.2 Air Quality

The San Diego Air Quality Control Board regulations state:

Regulation IV: Prohibitions; Rule 55: Fugitive Dust. Regulates fugitive dust emissions from any commercial construction or demolition activity capable of generating fugitive dust emissions, including active operations, open storage piles, and inactive disturbed areas, as well as track-out and carry-out onto paved roads beyond a project site.

The mitigation offered is:

Watering shall be conducted three times per day for all active construction areas and on unpaved roads. Water shall be applied using water trucks and shall be sufficient to confine dust plumes to the immediate work area.

The Draft SEIR does not consider the impact of dust on the nearby habitat restoration next door to the project site and their processing area. Should any dust escape the site, the

cumulative impacts on the plants in this restoration are will be severe. These are young plants, without a well-developed root base. Their survival requires the optimization of their foliar areas to receive sunlight and to enhance their photosynthesis. This project did not consider the cumulative impact of dust on this project.

To: Robin Rierdan, Executive Director, Lakeside's River Park Conservancy
From: Maryanne Vancio, Former Trails Coordinator for the County of San Diego Parks and Recreation Department
Re: 3.7 Recreation

Impacts:
The Project as proposed in the Draft SEIR will have significant and irreversible impacts to the Lakeside community as well as regionally. The comments below specifically address Recreation, the related errors in the Draft SEIR, as well as the long-term significant impacts to Recreation.

The Draft SEIR dismisses any significant impacts on Recreation because at the end of the Project, a minimum of 16 years with the potential to add many additional years, will provide a public trail system as part of the Reclamation Plan.

The Project as identifies 13 County owned or managed parks or facilities. The closest is 0.5 miles away; most under 2.0 miles. Although there are no physical impacts to the parks and/or facilities nor requirements to provide additional parkland, the effects of the air quality alone and the air borne particulate matter onto these recreational amenities would be accumulative over the 16+ years on park visitors. In additional, there are at least 5 local schools with outdoor recreation facilities such as ball fields that would also be affected. Air quality analysis does not address long time periods of people recreating outdoors. Outdoor recreation including trails are a high priority for community residents per County Parks and Recreation surveys. Frequent park users will be regularly subjected to the impacts or will simply stop using the local parks due to prolonged exposure and health concerns.

Not addressed are the impacts on the community trails during the 16 plus years of the sand mining operation. Virtually all access to the trails within the El Monte River Valley and this Project's boundaries will be eliminated or inaccessible.

There is a very high population of horses and other ranch animals in Valley. This fact alone gives concerns to the potential effect of Valley Fever (health and air quality) on horses and other domestic animals and pets. Many residents make their income from operating horse related facilities and cater to children. Many of which are dependent on the access to the trails within the Valley. The loss of trails for 16+ years is a significant cumulative impact that the Draft SEIR fails to address even in the "Alternative Analysis". Residents cannot put their lives on hold, they will have to close their businesses or move, if even possible when living next to a long-term sand mining operation.

Please re-evaluate the long-term Project impacts on recreation; especially the loss of existing trails and community access to them. The community has a 100+ year history with access to the trails on the Project site.

Project Description (as relates to trails)

1.4.2.3. Phase 1

Page 1-7 states: *The proposed Willow Road trail/pathway staging area will be implemented with Phase 1. In addition, the Type D pathway trails along El Monte Road and Willow Road would be created and available to the public during Phase I mining.*

To what extent will El Monte and Willow Roads Pathways be constructed? If they are to be available during Phase 1 mining, will they be constructed prior to the mining starting for Phase 1? At what point in Phase 1 will the staging area be constructed?

1.4.2.19 Safety and Security

Page 1-13 States: *The fencing and signage would allow public use of the trail easements but restrict public access to the operational areas of the project site. Trail easements would provide opportunities for riding and hiking along the periphery of the project site. Signage would be placed along the fence at appropriate intervals warning the public of hazards and restricted access.*

Identify which trails will be open—the pathways on Willow and El Monte Roads? If so, then confirm these two pathways will be constructed prior to the sand mining operations.

1.4.2.20 Power Source and Distribution

Page 1-14 States: *Poles that are located within the limits of mining activities would be abandoned and relocated, per SDG&E requirements.*

Ensure pole relocations are not placed in the 20-foot wide trail easements. Any pole relocation along El Monte or Willow Road needs sufficient setback so as not to encroach into the 10-wide pathway or any recorded trail easement.

1.4.3 Proposed Trail System

Page 1-14 States: *The final precise Community Trails and Pathways alignments are dependent upon several variables including input from state/federal resource agencies regarding sensitive resources, as well as public stakeholders.*

The alignments should already be determined with the Draft SEIR otherwise how can the analysis be presented. If the entire trail easement width (20-25 feet) is analyzed,

then there should be no conflict with sensitive resources. When the on-site trails are to be constructed, the site will have been totally disturbed. New habitat should not be introduced into the trail easements proposed by the Project. Any changes to trails location need public input not just the agencies. It is important that public input be provided before or at the same time as the agencies and not after agency input.

The 10-foot wide pathways and two-foot wide trails would be located within respective 20-foot wide easements. In addition to the trail/pathway alignments shown in Figure 1-10, the locations of two proposed trail/pathway staging areas, and associated trail construction phasing is also shown.

It is unclear how the Project is defining a "pathway". Pathways and trails are two different types of soft-surfaced recreational/transportation features. The County definition of a pathway is a soft surfaced non-motorized transportation element ("trail") within public road right of way or the road easement (not on private land). A separate easement is not needed if the pathway is within public road right of way. If proposing a 20-foot wide easement, then the assumption by definition is that the trail will be located within the Project boundary (private property), not within the road easement and a trail easement is required. Figure 3.7-2 Proposed Onsite Trail System shows the Phase 1, Type D Pathway Trail within the Project boundary. Correct your map and document to reflect Phase 1, Type A Trail with a 10-foot tread width.

Clarify: Figure1-10 and Figure 3.7-2 are the same figure, Proposed Onsite Trail System.
Both of these figures have a note that states: *Temporary and permanent fencing and exclusionary signage to be installed. Phase I would include 3-strand barbed wire around the entire perimeter of the project site during all four phases.* Barbed wire fencing is not permitted adjacent to trails or pathways.

Note that the County Trails Program defines trails and pathways as multi-use for pedestrians, equestrians and mountain bikers. A 2-foot wide trail is not acceptable and incompatible for the anticipated uses. This design will result in many user conflicts and safety hazards. Type B Trail, 6 -8 feet is recommended along with periodic turnouts for users to safely pass when going in opposite directions.

In general, the onsite Regional Trail (D) will be designed to accommodate Regional Trail users...

Please clarify where the Regional Trail is located on Figure 1-10/Figure 3.7-2 Proposed On-site Trail System. County Trails Program, Community Trails Master Plan Trail Design and Construction Guidelines for regional trails are 10 -12 feet wide trail. Provide a revised map showing location of the regional trail along with design details.

As shown in Figure 3.6-1, the onsite trails are proposed to cross the San Diego River bed three times and the mining pit low flow channel once with Arizona crossings.

Cannot locate Figure 3.6-1 in the report. Is the Arizona Crossing also a river crossing for the trail system? What safety construction elements for the trail users are incorporated into the crossing,

The Arizona crossings will traverse the onsite low flow channel/riverbed side slopes (with switchbacks if required) and cross the channel /riverbed at grade.

Are the switchbacks for the trail? If so, how steep are the side slopes that a switchback trail is necessary. What would the finish grade of the switchback be?

Figure 1-4: Shows the 20-foot wide bench crossing over the drop structure. If the trail is proposed on the 20-foot wide bench, show design of this section of the trail.

Page 1-15 States: *Easements for the perimeter Community Pathways (05 and 06) and the proposed trail/pathway staging area located along Willow Road will be dedicated and these facilities will be implemented during Phase 1 of the project.*

Clarify "dedicated". Are the trails being offered for dedication on the MUP or Reclamation Plan and accepted or will there be a separate recorded trail easement document. A separate trail easement document will be necessary to construct the trail within the Project boundary in Phase 1.

The internal community trails and regional trail and proposed trail/pathway staging area along El Monte Road will be implemented following completion of the Phase 4 mining.

Please clarify that no trail construction will happen in each phase while the restoration is being implemented (in each phase). Will all trail construction (community/regional/El
Monte Road) start at the end of 12 years? Please evaluate if some of the early phase trails or portions could be constructed when each phase is completed.

In order to allow flexibility to establish the final trail/pathway alignments, a blanket trail/pathway easement is also proposed to be recorded over the entire project site/MUP boundary.

Not sure this is understandable. A blanket trail easement over the 479.5 acres. When will this blanket trail easement be recorded? Prior to Phase 1 or start of the Project?

The applicant would be responsible for constructing and maintaining the onsite trails and staging areas until such a time that they are dedicated to the County.

Clarify if there is a blanket trail easement that is recorded (see above), why is there a dedication? Will the blanket trail easement be vacated?

3.7 Recreation

El Monte Sand Mining Project
PDS2015-MUP-98-014W2, PDS2015-RP-15-001, LOG NO. PDS2015-ER-98-14-016B
Comments regarding the Draft Subsequent Environmental Impact Report (DSEIR)

Submitted by:
Maryanne Vancio, Former Trails Coordinator County of San Diego, Park and Recreation Dept.
9837 Circa Valle Verde
El Cajon, CA 92021

The DSEIR does not adequately address the significant and irreversible recreational impacts to the Lakeside community as well as regionally. DSEIR does not offer any mitigation measures nor alternative analysis. The comments below specifically address Recreation, the related errors in the DSEIR, as well as the long-term significant impacts to Recreation.

The DSEIR dismisses any significant impacts on Recreation because at the end of the Project, a minimum of 16 years with the potential to add many additional years, will provide a public trail system as part of the Reclamation Plan.

The Project as identifies 13 County owned or managed parks or facilities. The closest is 0.5 miles away; most under 2.0 miles. Although there are no physical impacts to the parks and/or facilities nor requirements to provide additional parkland, the effects of the air quality alone and the air borne particulate matter onto these recreational amenities would be accumulative over the 16+ years on park visitors. In additional, there are at least 5 local schools with outdoor recreation facilities such as ball fields that would also be affected. Air quality analysis does not address long time periods of people recreating outdoors. Outdoor recreation including trails are a high priority for community residents per County Parks and Recreation surveys. Frequent park users will be regularly subjected to the impacts or will simply stop using the local parks due to prolonged exposure and health concerns.

Not addressed are the impacts on the community trails during the 16 plus years of the sand mining operation. Virtually all access to the trails within the El Monte River Valley and this Project's boundaries will be eliminated or inaccessible.

There is a very high population of horses and other ranch animals in Valley. This fact alone gives concerns to the potential effect of Valley Fever (health and air quality) on horses and other domestic animals and pets. Many residents make their income from operating horse related facilities and cater to children. Many of which are dependent on the access to the trails

within the Valley. The loss of trails for 16+ years is a significant cumulative impact that the DSEIR fails to address even in the "Alternative Analysis". Residents cannot put their lives on hold, they will have to close their businesses or move, if even possible when living next to a long-term sand mining operation.

Please re-evaluate the long-term Project impacts on recreation; especially the loss of existing trails and community access to them. The community has a 100+ year history with access to the trails on the Project site.

Project Description (as relates to trails)

1.4.2.3. Phase 1

Page 1-7 states: *The proposed Willow Road trail/pathway staging area will be implemented with Phase 1. In addition, the Type D pathway trails along El Monte Road and Willow Road would be created and available to the public during Phase I mining.*

To what extent will El Monte and Willow Roads Pathways be constructed? If they are to be available during Phase 1 mining, will they be constructed prior to the mining starting for Phase 1? At what point in Phase 1 will the staging area be constructed?

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Identify which trails will be open—the pathways on Willow and El Monte Roads? If so, then confirm these two pathways will be constructed prior to the sand mining operations.

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Ensure pole relocations are not placed in the 20-foot wide trail easements. Any pole relocation along El Monte or Willow Road needs sufficient setback so as not to encroach into the 10-wide pathway or any recorded trail easement.

1.4.3 Proposed Trail System

Page 1-14 States: *The final precise Community Trails and Pathways alignments*

are dependent upon several variables including input from state/federal resource agencies regarding sensitive resources, as well as public stakeholders.

The alignments should already be determined with the DSEIR otherwise how can the analysis be presented. If the entire trail easement width (20-25 feet) is analyzed, then there should be no conflict with sensitive resources. When the on-site trails are to be constructed, the site will have been totally disturbed. New habitat should not be introduced into the trail easements proposed by the Project. Any changes to trails location need public input not just the agencies. It is important that public input be provided before or at the same time as the agencies and not after agency input.

The 10-foot wide pathways and two-foot wide trails would be located within respective 20-foot wide easements. In addition to the trail/pathway alignments shown in Figure 1-10, the locations of two proposed trail/pathway staging areas, and associated trail construction phasing is also shown.

It is unclear how the Project is defining a "pathway". Pathways and trails are two different types of soft-surfaced recreational/transportation features. The County definition of a pathway is a soft surfaced non-motorized transportation element ("trail") within public road right of way or the road easement (not on private land). A separate easement is not needed if the pathway is within public road right of way. If proposing a 20-foot wide easement, then the assumption by definition is that the trail will be located within the Project boundary (private property), not within the road easement and a trail easement is required. Figure 3.7-2 Proposed Onsite Trail System shows the Phase 1, Type D Pathway Trail within the Project boundary. Correct your map and document to reflect Phase 1, Type A Trail with a 10-foot tread width.

Clarify: Figure1-10 and Figure 3.7-2 are the same figure, Proposed Onsite Trail System.
Both of these figures have a note that states: *Temporary and permanent fencing and exclusionary signage to be installed. Phase I would include 3-strand barbed wire around the entire perimeter of the project site during all four phases.* Barbed wire fencing is not permitted adjacent to trails or pathways.

Note that the County Trails Program defines trails and pathways as multi-use for pedestrians, equestrians and mountain bikers. A 2-foot wide trail is not acceptable and incompatible for the anticipated uses. This design will result in many user conflicts and safety hazards. Type B Trail, 6 -8 feet is recommended along with periodic turnouts for users to safely pass when going in opposite directions.

In general, the onsite Regional Trail (D) will be designed to accommodate Regional Trail users...

Please clarify where the Regional Trail is located on Figure 1-10/Figure 3.7-2 Proposed On-site Trail System. County Trails Program, Community Trails Master Plan Trail Design and Construction Guidelines for regional trails are 10 -12 feet wide trail. Provide a revised map showing location of the regional trail along with design details.

As shown in Figure 3.6-1, the onsite trails are proposed to cross the San Diego River bed three times and the mining pit low flow channel once with Arizona crossings.

Cannot locate Figure 3.6-1 in the report. Is the Arizona Crossing also a river crossing for the trail system? What safety construction elements for the trail users are incorporated into the crossing,

The Arizona crossings will traverse the onsite low flow channel/riverbed side slopes (with switchbacks if required) and cross the channel /riverbed at grade.

Are the switchbacks for the trail? If so, how steep are the side slopes that a switchback trail is necessary. What would the finish grade of the switchback be?

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Clarify "dedicated". Are the trails being offered for dedication on the MUP or Reclamation Plan and accepted or will there be a separate recorded trail easement document. A separate trail easement document will be necessary to construct the trail within the Project boundary in Phase 1.

The internal community trails and regional trail and proposed trail/pathway staging area along El Monte Road will be implemented following completion of the Phase 4 mining.

Please clarify that no trail construction will happen in each phase while the restoration is being implemented (in each phase). Will all trail construction (community/regional/El
Monte Road) start at the end of 12 years? Please evaluate if some of the early phase trails or portions could be constructed when each phase is completed.

In order to allow flexibility to establish the final trail/pathway alignments, a blanket trail/pathway easement is also proposed to be recorded over the entire project site/MUP boundary.

Not sure this is understandable. A blanket trail easement over the 479.5 acres. When will this blanket trail easement be recorded? Prior to Phase 1 or start of the Project?

The applicant would be responsible for constructing and maintaining the onsite trails and staging areas until such a time that they are dedicated to the County.

Clarify if there is a blanket trail easement that is recorded (see above), why is there a dedication? Will the blanket trail easement be vacated?

3.7 Recreation

3.7.1 Existing Conditions

3.7.1.1 Trails

Page 3.7-1 States: *There is currently unauthorized use of the project site by equestrians, bicyclists, and pedestrians; however, there are no dedicated trails on the project site.* Although there are no dedicated trail easements on the Project site, the site and surrounding area has a 100+ year history of continued use of trails and roads by the public. Much longer if you include the Kumeyaay's use.

Since Helix Water District has owned the land, there has been continuous equestrian use and other trail use of the property. The use has been open and known to Helix evidenced by their installation of trail gates to provide access to their land for pedestrians and equestrians while keeping out off-road/motorcycle use. This continued and historical access was also known to Mr. Bill Adams when the golf course was planned and trail access was provided during construction. As a result of this free and open access, the El Monte Valley has become a very popular destination for equestrian trail users from all over the County. It has become home to a large equine population, small to mid-size equestrian ranches, facilities and related businesses. These facilities range from backyard horse keeping, boarding and training businesses to therapy assistance programs. These facilities are all depend on access to the existing trail system on the Project site and surrounding lands.

The economic impact, although not typically addressed in CEQA, will be devastating to these businesses and facilities. The development of the new trail system will take at a minimum of 16 years to complete. Such an extensive period of time will completely destroy the viability of those businesses and backyard horse keeping. The hundreds of horses that have located in the El Monte Valley are there because of the open trail access. Without trails, the horses will leave the area, businesses will have no choice but to close, creating a devastating economic impact on the community of Lakeside for many years beyond the sand mining. The economic impact of the horse industry in the U.S.: *"horse ownership, equine institutions, profit and non-profit organizations and tourism spending by participants and spectators combine for a $215 billion impact"* to U.S. economy

(*American Horse Council Foundation, 2017*). Just losing the equine population in the El Monte Valley will have a significant impact on the local and regional economy.

An Alternative Analysis to the DSEIR document should include keeping a functional trail system open or at least access to trails to connect to the west as was planned with the Golf Course project, so the impact is not so destructive to the community.

Proposed trails on the Project site, Figure 3.7-1, County Community Trails Master Plan Trail System, clearly highlights the number of trails impacted by the Project.

D: San Diego River Park Regional Trail – ...the trail does not yet exist in El Monte Valley.

Approximately 2,000 feet of the San Diego River Regional is existing, constructed with a recorded trail easement over it. It is located on the north side of "Hanson Pond". See your Figure 3.7-2.

The San Diego River Conservancy has the long-range task and oversight to develop this regional trail from the ocean to the headwaters in Julian. The Project will cause at least a 16-year delay (and more if an amendment/extension to the Major Use Permit is approved). This is a devisting impact to the completion of the regional trail leaving approximately a 3.5-mile gap that cannot be completed for a minimum of 16-20 years. This is a significant impact to recreation both locally and regionally.

05: El Monte Road Pathway – This segment will provide a connection from Lake Jennings to El Monte Park and the El Capitan Reservoir along a designated scenic corridor. This segment has not yet been developed.
What portion (length) of the El Monte Road Pathway will be developed as part of the Project. Will it be the entire length of the Project boundary as indicated on Figure 3.7-2, Phase 1. At what time will it be made available to the public for use. Will this be a pathway or trail easement.

06: Willow Road –The western portion of this segment is a heavily used community pathway paralleling the San Diego River, but it does not yet exist in El Monte Valley in the vicinity of the project site.

What portion (length) of the Willow Road Pathway will be developed as part of the Project. Will it be the entire length of the Project boundary as indicated on Figure 3.7-2 Phase 1. At what time will it be made available to the public for use. Will this be a pathway or trail easement.

07: El Monte/Willow Connector Trail – This segment does not yet exist but will provide a connection across the San Diego River.

This is an important north-south connection between the two pathways on Willow and El Monte Roads. If it is not intended to be constructed till Phase 4, please evaluate if this connection can be made available temporarily during the earlier phases.

09: Doc Herring Ranch Trail – This segment does not yet exist will provide a connection from Cactus Park to the El Monte Road Pathway (05).

This is not correct. The trail section is exiting, on the ground and connects to the segment of the San Diego River Trail just north of Hanson Pond. There is a County easement on the property that protects the trail in perpetuity. See your Figure 3.7-2.

61: Dairy Road – This segment is a dirt road providing a crossing over/through the San Diego River, but an official trail does not yet exist.

This is also a popular north south connection. It is shown on Figure 3.7-2 to be constructed in Phase 1 with El Monte and Willow Roads pathways. This pathway or trail needs to be constructed outside of the driven roadway and not just "designated" to the dirt road or shoulder. If the trail is at grade with the Dairy Road, then some type of delineator needs to be installed to provide a visual separation.

3.7.2.2 Issue 2: Construction or Expansion of Recreational Facilities

Analysis

Page 3.7-8 States: *Implementation of the proposed project would include a new recreational trail system. As shown on Figure 3.7-2... Proposed trails would consist of both Type C Primitive Trails and Type D Pathways. Type C Primitive Trails would be <u>designed to be 3 feet wide within a 25-foot-wide easement.</u> Type D Pathways would be 10 to 12 feet wide within a 20-foot-wide easement.*
Note: In the Project Description 1.4.3 Proposed Trail System, Page 1-14, describes: *The 10-foot wide pathways and <u>two-foot wide trails would be located within respective 20-foot wide easements.</u>*

There is a discrepancy in the trail width, 3-feet vs. 2-feet and easement width, 25-feet vs. 20 feet. However, as previous noted a 2 or 3-foot wide trail is not acceptable for multi-use. For two horses to safely pass each other on the same trail in opposite directions, a minimum of 10-feet is required. Note: If both sides of a trail are to be fenced, there must be a minimum interior dimension of 10-feet; 12-feet is optimum. Figure 3.7-2 shows the Type C Primitive Trail to be located on the post mining 20-foot bench. Since the trail will be placed on the created 20-foot bench, it can easily accommodate a 5 – 6-foot wide trail tread with 2-foot shoulders on either side to accommodate passing or incorporate turns outs for two-way passing. Where there is a line of sight issue, there should be turnouts every 50 to 100 feet sight distance. Tread width and the addition of

turnouts should be re-analyzed. Provide a cross section of what this trail will look like on the bench.

Figure 3.72, Proposed Onsite Trail System fails to identify the alignment of the San Diego River Regional Trail. It is shown on Figure 3.7-1 County Community Trails Master Plan Trail System along with the other community proposed trails. The County trail design guidelines for a regional trail is a minimum of 10-feet wide. There are no trails identified with such a tread width. Add the San Diego River Regional Trail to the Onsite Trail System and provide a cross section showing the trail design.

3.7.4 Significance of Impacts Prior to Mitigation

The DSEIR lacks consideration of the impacts the Project will have on the existing recreational opportunities—trails, parks and other outdoor recreational facilities. It states there are no significant impacts to recreational facilities and, therefore, no mitigation is required.

There will be significant recreational impacts to due to the loss of use of the existing trail system for such an extended period of time both locally and regionally. There may also be the loss of use of park facilities due to cumulative air quality issues. This needs to be analyzed. For many in the El Monte Valley, there will be the loss of their business and family income. For others, the loss of access to the area's most popular trail system. With over 200 horses in the valley and more in the surrounding areas including Blossom Valley and Moreno Valley, which includes hundreds of residents, this Project poses a very significant impact. The impacts cannot be mitigated after 16 or more years of sand mining simply by stating a new trail system will be developed.

The Lakeside's River Park Conservancy has been working on developing the San Diego River Trail within Lakeside and works cooperatively with the San Diego River Conservancy. This State Conservancy has the long-range task and oversight to develop the San Diego River Regional Trail from the ocean to the headwaters in Julian. This is one of the regional trails identified in the County's General Plan which represents a trail of significant importance regionally. All the progress made over the years between these two Conservancies toward completing this section of the trail are now put on hold for 16+ years or may no longer be viable. Without having an alignment to build from or connect to, it will be extremely difficult to acquire the necessary connections—land or easements to complete the trail.

The Project will cause at least a 16-year delay (and more if an amendment to the Major Use Permit is approved) to the development of the regional trail in El Monte Valley. This is a devastating impact to the time line for completion of the regional trail. The Project will leave an approximate 3.5-mile gap that cannot be completed. This is a significant impact to recreation both locally and regionally.

4.0 Project Alternatives

The DSEIR proposes no Project Alternatives for recreation. Since the Golf Course project was required to leave trails opened for the community during various phases, this Project should at the very least propose such a plan to lessen the long-term impact on the community.

Robin Reirdan, Executive Director
Lakeside River Park Conservancy
12108 Industry Road
Lakeside, CA 92040-1736

Re: El Monte Sand Mining Project PDS2015-MUP-98-014W2, PDS-2015-RP-15-001, LOG NO. PDS2015-ER-98-14-016B; SCH NO.2015081025 (INFORMATION/ACTION)

As requested, I have reviewed the aesthetics section of the above referenced document for your use during the public comment period that ends on 10/29/2018. The methodology for determining visual impacts is based on the County of San Diego's Visual Impact Analysis Guidelines (VIA).
My comments are as follows:

Mapping

1. The overhead photograph (satellite image) of the project site and surrounding properties needs to be corrected to reflect that the previous Hanson Mining Site (immediately west and contiguous to the proposed project) is no longer an open groundwater pit but a completed habitat restoration project. This is important in that it is similar to the proposed project and shares many of the same visual issues. This correction affects all satellite photo based graphics and several photo simulations.

Report

2. **Section 2.1.2.1 Scenic Vistas:** The report identifies that during mining operation impacts to scenic vistas would be substantial, thus significant. Impacts to existing scenic resources have been determined to be **less than significant** post-reclamation due to the implementation of mitigation measures, primarily because of the revegetation of the mined area and project screening. Certainly, vegetation will help mitigate post-mining impacts, however, the VIA states the post-reclamation grading will result in the straightening of the natural undulation of existing topography and the creation of large cut slopes. Landform modifications, the result of large extraction mining projects, cannot be completely mitigated with vegetation alone. Undulating cut and fill slopes

are needed to reduce visual impacts, particularly in areas where low growing and the open nature coastal sage and chaparral plant communities are proposed. Grading for biological niches is also important to create habitat that is visually pleasing to certain user groups.

3. **Section 2.1.2.3 Visual Character and Quality:** Again, the **less than significant** determination is based on the successful implementation of a native plant communities plan. The removal of invasive plant and replacement with native plants certainly results in positive benefits to the visual, but I do not feel that it can change a **significant visual impact** condition to **less than significant impact**.

   Overall concerns with the visual report are as follows:

   - I do not believe it is realistic to change **significant** to **less than significant** based primarily on revegetation given that there is significant landform modification associated with this project.
   - There is limited discussion of the visual conditions created by heavy truck traffic. Given the duration (12 years) of sand and gravel extraction and the associated truck traffic (150 trips/day, 6 days /week), I believe the negative visual conditions of users of El Monte Road is significant. Twelve years of large trucks traveling along a scenic corridor would degrade the visual quality experience of all users. For example, a school age child would be subjected to this truck environment from grammar school through high school. Quite a difference from the bucolic experience of the existing condition. Users of the El Monte Regional Park would also experience a degradation of the scenic corridor experience.

Sincerely,

Gary Ruyle
RLA #3117

The Draft SEIR clearly does not adequately describe the impacts of this project to the environment and the mitigation offered does not reduce such impacts to a less than significant level as required by the California Environmental Quality Act (CEQA), Public Resources Code

§ 21000 et seq. and California Code of Regulations, title 14, § 15000 et seq. (CEQA Guidelines). As a result, neither the public nor the County are provided sufficient information to complete a meaningful review of the project and its potential effects on the environment. The Draft SEIR must, therefore, be revised and re-circulated to allow for such meaningful review and opportunity to comment.

Please accept these comments on the Draft SEIR for the El Monte Sand Mine.

Thank you.

Sincerely,

Robin Rierdan
Executive Director.