

STATEMENT OF REASONS TO PERMIT THE PROPOSED USE AND EXTINGUISH ACCESS TO MINERAL RESOURCES OF REGIONAL SIGNIFICANCE

Project Name: El Monte Sand Mining Project, PDS2015-MUP-98-014W2, PDS2015-RP-15-001, PDS2015-ER-98-14-016B; SCH NO. 2015081025

Project Location: The project is located in the Lakeside Community Planning area, within the unincorporated portion of San Diego County. The project site is bordered by El Monte Road to the south and Willow Road to the north and is 1.5 miles east of SR-67, where SR-67 crosses the San Diego River. The project site is three miles west of the El Capitan Dam.

Section 2763 of the Public Resources Code require the County as Lead Agency to prepare, in conjunction with the preparation of an Environmental Impact Report (EIR), and prior to approving a project, a statement specifying the County's reasons for permitting a proposed use in an area that contains mineral resource deposits of regional or statewide significance. The County of San Diego is considering the approval of the proposed El Monte Sand Mining Project, which although would extract mineral resources from lands classified by the Mineral Resource Zone (MRZ) System, would also prevent access to much mineral resources left in place following reclamation and revegetation. The final landform would contain dedicated biological open space easements as mitigation for project impacts. Dedication of trail easements and construction of multiple-use trails would also be required on the project site. The County's statement is as follows:

BACKGROUND INFORMATION

Mineral Resource Zone

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

- MRZ-1 – Areas where adequate information indicates that no significant mineral deposits are present or likely to be present.
- MRZ-2 – Areas where adequate information indicates that significant mineral deposits are present or where it is judged that there is a high likelihood for their presence.
- MRZ-3 – Areas containing mineral deposits, the significance of which cannot be evaluated from available data. In contrast to MRZ-2 areas where it has been judged that there is a high likelihood of minable, marketable mineral deposits (notably

Portland cement and asphaltic concrete aggregate), MRZ-3 areas are areas where the data is not sufficient to evaluate the significance of any potential aggregate deposit.

- MRZ-4 - Areas where available information is inadequate for assignment to any other MRZ zone.

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

Project Description

The proposed project would extract 12.5 million tons of PCC-grade construction sand and gravel over a 12-year period from a 479.5-acre site in the El Monte Valley that includes the San Diego River channel. Mining would occur over 228 acres of the site including the existing San Diego River channel, in four phases to a depth of approximately 36 to 41 feet below the current ground elevation and would not excavate into the current groundwater table. This equates to mining to a bottom-of-pit elevation of approximately 399 feet above mean sea level (msl) to 434 feet above msl from west to east across the site. The site will be reclaimed and revegetated with native species and habitats. Final disposition of the site will include dedicated biological open space as mitigation for project impacts, and dedicated and constructed multiple use trails and staging areas.

Potentially available mineral resources on MRZ-2 lands:

The State Geologist has designated the alluvial portions of the project site as MRZ-2 (majority of the 479-acre site); the slopes bordering the site and valley consist primarily of granitic bedrock and have been designated as MRZ-3. The project site lies within Sector M of the Upper San Diego River Resource Sector as defined in the County Guidelines for Mineral Resources.

Previous studies by the State of California (DMG Open File Report 96-04) include prior borings indicating that the thickness of the resource in the project site is in the order of 100 to 200 feet in depth. Assuming a price of \$20.00 per ton, a density of 0.055 ton per cubic foot, and a waste factor of approximately 20 percent, the value of the total 30 million tons of aggregate material mapped as MRZ-2 is estimated to be approximately \$480,000,000.00. The 12.5 million tons of sand and aggregate material that is proposed to be mined is estimated to have a value of \$200,000,000.00, based on the price and waste factors above. Therefore, there will be approximately \$280,000,000 worth of onsite

mineral resources that will remain unmined and lost for future mining once reclamation of the site is complete.

Potential project impacts on the MRZ-2 Area:

The proposed project would not extract all available mineral resources within the project site and would be limited to mining only the upper 36 to 41 feet of material in order to stay above the current water table level (which is below the proposed level of extraction) so impacts to the underlying aquifer and water balances do not occur.

Implementation of the reclamation and revegetation plans would restore the project site to a natural state with native habitats and biological open space easements, as well as recreational trail easements for use by equestrians, hikers, and bicyclists. As such, the remaining mineral resources within the project site would not be accessible and would be precluded from future extraction for marketability.

Potential Reasons Why County May Permit the Loss of Potential Mineral Resources, by Implementation of the Proposed Project

The reasons for project approval listed below are:

- 1. Protection of Groundwater Levels:** A majority of the project site is within the 100-year floodplain of the San Diego River; however, since construction of the El Capitan dam in 1935 (approximately three miles upstream (east) of the site), overtopping events have occurred infrequently with the most recent overtopping event occurring 25 years ago in 1993. Below El Capitan Reservoir, only a small watershed area contributes runoff to the San Diego River above the project site. As such, in most years, this small watershed area does not yield sufficient runoff to cause substantial flow within the river channel through the project site.

Current annual groundwater consumption within the study area includes a combination of residential water usage; Helix Water District pumping; City of San Diego pumping; County of San Diego pumping for El Monte Regional Park; and agricultural irrigation, transpiration of groundwater-dependent vegetation, and surface water evaporation in Hanson Pond. Annual groundwater consumption within the tributary watershed the last 40 years has fluctuated based on area wide water levels affecting pond evaporation and phreatophyte demand, gradual buildout of the residential water demand, and changes in Helix Water District and City of San Diego pumping. Total groundwater demands over the last 40 years have ranged from approximately 1,240 acre-feet per year (afy) to approximately 2,300 afy with a 40-year average annual groundwater demand of approximately 1,700 afy.

Sources of groundwater recharge include infiltration from precipitation, El Capitan Dam periodic overtopping, and streambed infiltration from local stormwater runoff. As stated above, the most recent overtopping of the El Capitan dam was in 1993. Groundwater levels have been declining for the past 15 years by 1.7 feet per year (ft/yr) on average, with existing levels being about 390 to 425 feet above msl. This is approximately 40 to 50 feet below ground surface (bgs).

If mining were to extend to a depth below the current groundwater level, standing water would result in the pit and evaporate at a rate estimated to be 4.55 acre-feet per year per acre of exposed water surface. Without sufficient rainfall/runoff events or dam overtopping events to balance the evaporative loss, evaporation of water in the pit would come mainly from the groundwater table likely increasing the observed rate of groundwater level decline. This evaporative loss could comprise a large percentage of existing groundwater demands and potentially affect the sustainability of the basin to supply those demands.

- 2. Biological Open Space:** The project site currently contains mainly Disturbed Habitat, and Non-native Grassland, and Tamarisk Scrub. Limited areas of native habitat are present and include Diegan Coastal Sage Scrub, Southern Cottonwood Willow Riparian Forest, and Southern Willow Scrub. Despite the prevalence of disturbed and non-native habitats the site does harbor a number of special status species. Mitigation measures will be implemented to avoid or minimize potential impacts to a less than significant level, including to California gnatcatcher and least Bell's vireo. As mining activities progress through the site from east to west, reclamation and revegetation activities will commence and result in the restoration of the site to native habitats including Coastal Sage Scrub, Southern Willow Scrub, and Southern Cottonwood Willow Riparian Forest. Reclamation and revegetation to these habitats is anticipated to provide a much greater amount and higher quality of these habitats than currently exists onsite; thereby providing for greater numbers and diversity of species. The project would result in much of the site being dedicated as biological open space to mitigate project impacts to biological resources. This dedicated open space would be managed and maintained for the benefit of wildlife species in both riparian and upland habitats and would complement nearby conservation efforts in the El Monte Valley.

The project also proposes to bring the site into the County's Multiple Species Conservation Program. The project site was previously owned by Helix Water District and is currently located outside of the County's MSCP Subarea Plan. However, the site comprises a "doughnut hole" within the Metro-Lakeside-Jamul Segment of the County's MSCP Subarea Plan with Pre-Approved Mitigation Area (PAMA) lands within the Metro-Lakeside-Jamul Segment immediately surrounding

the project area. As the project site is now privately owned, the project proposes a Boundary Line Adjustment (BLA) to the County's MSCP Subarea Plan (County of San Diego, 1997). The proposed BLA (or other mechanism acceptable to the wildlife agencies) would contribute the total 479.5-acre project site to the County's MSCP Subarea Plan thereby increasing the total size of the PAMA lands potentially allowing for more coordinated conservation efforts with nearby parks and preserves in the El Monte Valley area and along the San Diego River channel.

- 3. Recreational Use:** The project site and surrounding area includes several planned trail alignments that are part of the County's Community Trail Master Plan (CTMP). There is currently unauthorized use of the project site by equestrians, bicyclists, and pedestrians; however, there are no dedicated trails on the project site.

Implementation of the proposed project would include a new recreational trail system. The proposed project would include an onsite trail system and staging areas to provide residents and the community with opportunities for equestrian, bicycling, and pedestrian activities on and through the project site, as well as contribute to the expansion of and linkage to the County's trail system. The development of the proposed onsite trail system would provide more hiking, bicycling, and equestrian opportunities in the Lakeside Community Plan area.

REFERENCES

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