County of San Diego

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NOTICE OF PREPARATION DOCUMENTATION

DATE: October 17, 2019

PROJECT NAME: COTTONWOOD SAND MINING

PROJECT NUMBER(S): PDS2018-MUP-18-023, PDS2018-RP-18-001

PROJECT APPLICANT: New West Investment Group, Inc., 565 N. Magnolia Avenue, El Cajon, CA 92020; Attn: Mr. Greg Brown

ENV. REVIEW NUMBER: PDS2018-ER-18-19-007

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.

PROJECT DESCRIPTION:

The project seeks approval of a Major Use Permit (MUP) and Reclamation Plan to conduct a sand mining operation on 251 acres of an approximately 280-acre property that has been and is currently known as the Cottonwood Golf Club. The current MUP 61-090 W2 for the golf club use would be disestablished and the remaining 29 acres of the golf course use would revert to the underlying zoning classifications of S80 (Open Space), S88 (Specific Plan), and S90 (Holding Area). The currently operating Ivanhoe golf course and clubhouse would cease operations upon approval of the MUP, if approved. Sand mining would occur on approximately 214 of the 251 acres.

The project's mining operations would extract, process, and transport aggregate (sand and gravel) using conventional earth moving and processing equipment. Approximately 4.8 million cubic yards (CY) (7.05 million tons) of material would be extracted and processed, with approximately 3.8 million CY (5.7 million tons) of marketable aggregate produced for sale over

a 10-year period. Extraction operations would be limited to a maximum production of 380,000 CY (570,000 tons) of construction grade aggregate per calendar year.

Sand mining activities would be conducted in three phases over a period of 10 years beginning with Phase 1 in the western portion of the site that is currently occupied by the closed 18-hole Lakes golf course. Phase 1 would include grading and construction of the processing plant on the west side of the Cottonwood Golf Club clubhouse; placement of a mobile conveyor line from the processing plant to the Phase 1 extraction area; and development of a new access point to the Phase 1 area at the intersection of Willow Glen Drive and Muirfield Drive, west of the Steele Canyon Road. This new access would be necessary as the clearance height of the bridge that crosses the Sweetwater River on Steele Canyon Road would not allow large trucks or heavy equipment used for mining operations to pass beneath the bridge. The new access point will be used to allow access to the area by employees, vendor's service vehicles and reclamation crews during Phase 1 operations. This access point would not be used for material transport.

The processing plant site would consist of aggregate screening 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 mobile conveyor line would transport excavated aggregate materials to the plant from the Phase 1 area by extending under the Steel Canyon Road bridge. The conveyor line would be mobile to provide material transport from each phase to the processing plant.

Mining would proceed from Phase 1 towards the east to Phases 2 and 3. The mobile conveyor line would be moved to transport aggregate from Phases 2 and 3 to the processing plant. The entire extraction process is expected to be complete after a 10-year period. Approximately 20 to 25 acres would be subject to active extraction at any one time. The maximum excavation depth is proposed to be 40 feet below the existing land surface outside the Sweetwater River channel. The average depth of excavation is expected to be approximately 20 feet. Excavation of the existing river channel would not occur; however, excavation would result in an increased channel width of 250 to 300 feet. The existing river channel would hold and transfer low flow through the project site.

Reclamation and revegetation of the mined area would comprise a fourth phase (Phase 4) and begin in the second year as mining proceeds to the east and would end two years after mining activities cease. 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. Revegetation with native plant species would begin immediately once grading and topsoil placement is completed in excavated areas. Phase 4 would include final reclamation grading, clean-up and removal of the processing plant, and completion of revegetation of remaining excavated areas with native plant species. Thus, total project duration would be 12 years. Revegetated and restored habitat would be maintained and monitored for a minimum of five years, or until the project's performance standards are met. Performance standards would include specifications for amount of native cover, non-native cover, invasive species cover, and native species richness criteria.

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 area. No material sales or trucking will occur on weekends. A total of 88 one-way (176 round trip) truck trips per day would be generated. In addition, a total of 14 one-way (28 round trip) light vehicle trips and 4 one-way (8 round trip) vendor trips (fuel, supplies, service companies, etc.) would be generated per day. 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.

The Project site is currently zoned as Open Space (S80 (4 acres)), Specific Planning Area (S88 (32 acres)) and Holding Area (S90 (244 acres)). 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. 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.

PROBABLE ENVIRONMENTAL EFFECTS:

The probable environmental effects associated with the project are detailed in the attached Environmental Initial Study. All questions answered "Potentially Significant Impact" or "Less than Significant with Mitigation Incorporated" will be analyzed further in the Environmental Impact Report. All questions answered "Less than Significant Impact" or "Not Applicable" will not be analyzed further in the Environmental Impact Report.

The following is a list of the subject areas to be analyzed in the EIR and the particular issues of concern:

Aesthetic Resources
Air Quality and Greenhouse Gas Emissions
Biological Resources
Cultural Resources
Hydrology & Water Quality
Land Use Planning
Noise
Transportation/Traffic
Tribal Cultural Resources
Wildfire Hazards

Attachments:
Project Regional Location Map
Project Detailed Location Map

Plot Plan Exhibit
Environmental Initial Study

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 Regulation:	Portion F (Floodplain)

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 much 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 oen 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 Hin t en 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?

☒ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ 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?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ 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?

☒ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ 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?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ 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?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ 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?

☐ Potentially Significant Impact ☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☒ 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))?

☐ Potentially Significant Impact ☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☒ 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?

☐ Potentially Significant Impact ☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☒ 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?

☐ Potentially Significant Impact ☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☒ 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 With Mitigation Incorporated
☐ Less than Significant Impact
☐ 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 With Mitigation Incorporated
☐ Less than Significant Impact
☐ 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, NOx, PM10, and PM2.5 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?

☒ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ 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?

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☐ 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?

☒ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ 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?

☒ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ 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?

☒ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ 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?

☒ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ 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?

☒ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ 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?

☒ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ 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?

☒ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ 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?

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ 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?

☒ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ 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?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ 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?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ 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.

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ 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?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ 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?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ 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?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ 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?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ 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?

☐ Potentially Significant Impact
☒ 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 (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). 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?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ 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?

☐ 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 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?

☐ 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 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?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ 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?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ 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?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ 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?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ 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?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ 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?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ 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)?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ 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