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# **Appendix AA**

## NOP and Comment Letters



**State of California – The Resources Agency**  
**DEPARTMENT OF PARKS AND RECREATION**



**NOTICE OF PREPARATION**

**PROJECT TITLE: Nelson Sloan Quarry Restoration Project**

The California Department of Parks and Recreation (CDPR) is the Lead Agency under the California Environmental Quality Act (CEQA) for the Nelson Sloan Quarry Restoration Project (Project) and is preparing an environmental impact report (EIR) to evaluate the potential effects of implementing the project. CDPR would like to know the views of your agency or organization concerning the scope and content of the EIR that is germane to the statutory responsibilities of your agency or organization, in connection with the proposed project including potential project alternatives. If you do not belong to an agency or organization, this notice has been sent to provide you with an opportunity to comment on the scope of the review and to identify important issues you believe should be evaluated in the EIR. A written response to this Notice of Preparation will provide you with the opportunity to identify and discuss these issues. The EIR will evaluate the project-specific and cumulative impacts, identify feasible mitigation measures to reduce or avoid significant project impacts, and identify a reasonable range of potentially feasible alternatives to the proposed project and describe their comparative environmental effects.

**PROJECT LOCATION**

The Nelson Sloan Quarry property is located on County of San Diego (County) jurisdictional lands in the southwestern portion of the County and encompasses Assessor's Parcel Numbers (APNs) 664-011-05-00, 664-011-04-00, 664-011-03-00, and 664-020-04-00. While the quarry property consists of the four parcels listed above, proposed construction and restoration activities would occur entirely on the two easternmost parcels (i.e., 664-011-05-00, 664-011-04-00) that previously supported an active sand and gravel quarry. The project site is located within the southeastern corner of Tijuana River Valley Regional Park and the site is situated approximately 400 feet south of the intersection of Monument Road and Old Dairy Mart Road (see attached Regional Location Map). Further, the project site abuts Monument Road and the City of San

Diego's (City) South Bay Water Reclamation Plant on the east. The U.S. International Boundary and Water Commission's (USIBWC) South Bay International Wastewater Treatment Plant is located approximately 0.25-mile to the east. Federal lands managed by U.S. Customs and Border Protection are located to the south (the international border fence is located 450 feet south of the project boundary) and County jurisdictional lands are located to the west and north. Border Field State Park, Tijuana Slough National Wildlife Refuge, and the Tijuana River National Estuarine Research Reserve are located to the west and north. Interstate 5 and Interstate 805 provide regional access to the project area and are 1.15 mile and 1.9 mile, respectively, east of the project site.

## **PROJECT BACKGROUND**

In 1982, the City approved a Conditional Use Permit (CUP) and reclamation plan for a sand and gravel quarry on the project site. Known as the Nelson Sloan Quarry and/or the Border Highlands Pit, the quarry operated for twenty years (1982-2002) and following active operations, the property was sold to the County by the City using grant funding from the State of California Coastal Conservancy. Per the terms of the sale and recorded agreement, the property is to be used in perpetuity for habitat protection and open space. The County and the City have worked with State of California Division of Mine Reclamation to reclaim the quarry since 2002. The Nelson Sloan Quarry project site is currently vegetated with scrub and non-native invasive plants, has a series of informal dirt routes throughout, and a cut slope denoting the transition of past active mining operation into less-disturbed upland regions.

While in the past, the uplands of the Tijuana River Valley have been a location for sand and gravel mining, more recently the area is known for the efforts of government land managers to capture and remove sand and sediment entering the river and estuary from cross-border flows from Mexico. For approximately 15 years CDPR has operated and maintained the Goat Canyon Sediment Basins in the Tijuana River Valley. Located approximately 1.1 mile to the west of the project site, the sediment basins are intended to stop the flow of excess sediment from a highly disturbed canyon in Mexico from impacting the ecology and natural hydrologic process of the Tijuana River and Estuary, and Pacific Ocean. CDPR is also working with the Southwest Wetlands Interpretive Association to remove sediment from the Tijuana Estuary through the Tijuana Estuary Tidal Restoration Program, an on-going effort to restore critical natural functions to the Tijuana Estuary. Additionally, the City, County, and IBWC operate and maintain flood-control channels in the Tijuana River Valley - facilities that not only help to maintain the ecology of the Tijuana River Valley, but also serve to protect from flooding the built infrastructure within the Tijuana River Valley and the communities that live and work in these areas. The majority of sediment excavated by CDPR and other agencies is exported to the City's Miramar Landfill or reused at locations located significant distances from the excavation sites. Annual costs for each agency to maintain, process/sort, haul, and export are significant.

## **PROJECT DESCRIPTION**

The project consists of the beneficial re-use of excess sediment excavated from flood control facilities and disturbed habitats in the Tijuana River Valley towards the restoration of the Nelson Sloan Quarry. More specifically, excess sediment extracted from flood control facilities, and habitat restoration projects, managed by CDPR, City, County, and USIBWC (and potentially, other stakeholders) that are currently hauled offsite to area landfills, or construction projects, would instead be hauled to the project site for processing and placement to restore the quarry slopes to natural landform and high quality upland habitat. Use of the project site for sediment placement by area stakeholders would ultimately be determined by an Operations and Maintenance Plan and multi-jurisdictional agreement. At this time, members of the agreement are anticipated to include CDPR, the City of San Diego, the County, USIBWC, US Customs and Border Protection, the San Diego Regional Water Quality Control Board, the California Department of Resources Recycling and Recovery, and potentially, site operators.

Up to approximately 1,000,000 cubic yards of excess sediment would be hauled to the project site over an approximate 10 to 15 year period. Deposited sediment would be processed at an onsite processing pad/stockpile staging area. In a phased approach, acceptable sediment would then be deposited and re-graded to a stable condition on the slopes of the eastern portion of the project site (i.e., APNs 664-011-05-00 and 664-011-04-00). Erosion and drainage control measures, and revegetation of regraded areas, would also be implemented. Unacceptable sediment would be hauled offsite to a permitted landfill or be used for other allowable and permitted purposes.

In addition to beneficial re-use of excess sediment, habitat restoration, and reduced maintenance costs, implementation of the project would help local communities near the Tijuana River Valley realize multiple benefits. Proposed use of the project site for sediment management and restoration activities (and related long-term habitat protection and open space) would improve water quality within the watershed as well as improve recreational access and quality of life for downstream communities. In addition, the long-term goals of the project include the enhancement of upland habitat on site and riparian and estuarine habitats in the valley, and reduced flooding hazards throughout the valley.

## **POSSIBLE ENVIRONMENTAL EFFECTS AND SCOPE OF THE EIR**

The project has the potential to cause significant effects on Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Recreation, Transportation and Traffic, Tribal Cultural Resources, and Utilities and Service Systems.

CEQA requires that the discussion of any significant effect on the environment be limited to substantial, or potentially substantial, adverse changes in physical conditions that exist within the affected area, as defined in Public Resources Code section 21060.5.

## **ENVIRONMENTAL REVIEW PROCESS**

Comments as to the appropriate scope of analysis in the EIR are invited from all interested parties. Written comments or questions concerning the scope of analysis for the EIR should be directed to the contact listed below using full name and address not later than thirty (30) days after the receipt of this notice or by May 16, 2019.

Once completed, the Draft EIR will be made available for a 45-day public review and comment period in accordance with CEQA. Responses will be prepared for all significant environmental comments received and revisions made to the Draft EIR, if any, will be included in the Final EIR to be presented to the California State Parks and Recreation Commission Hearing for review and approval.

Notices associated with the project's CEQA review are available at:

[https://www.parks.ca.gov/?page\\_id=983](https://www.parks.ca.gov/?page_id=983)

<http://trnerr.org/about/public-notices/>

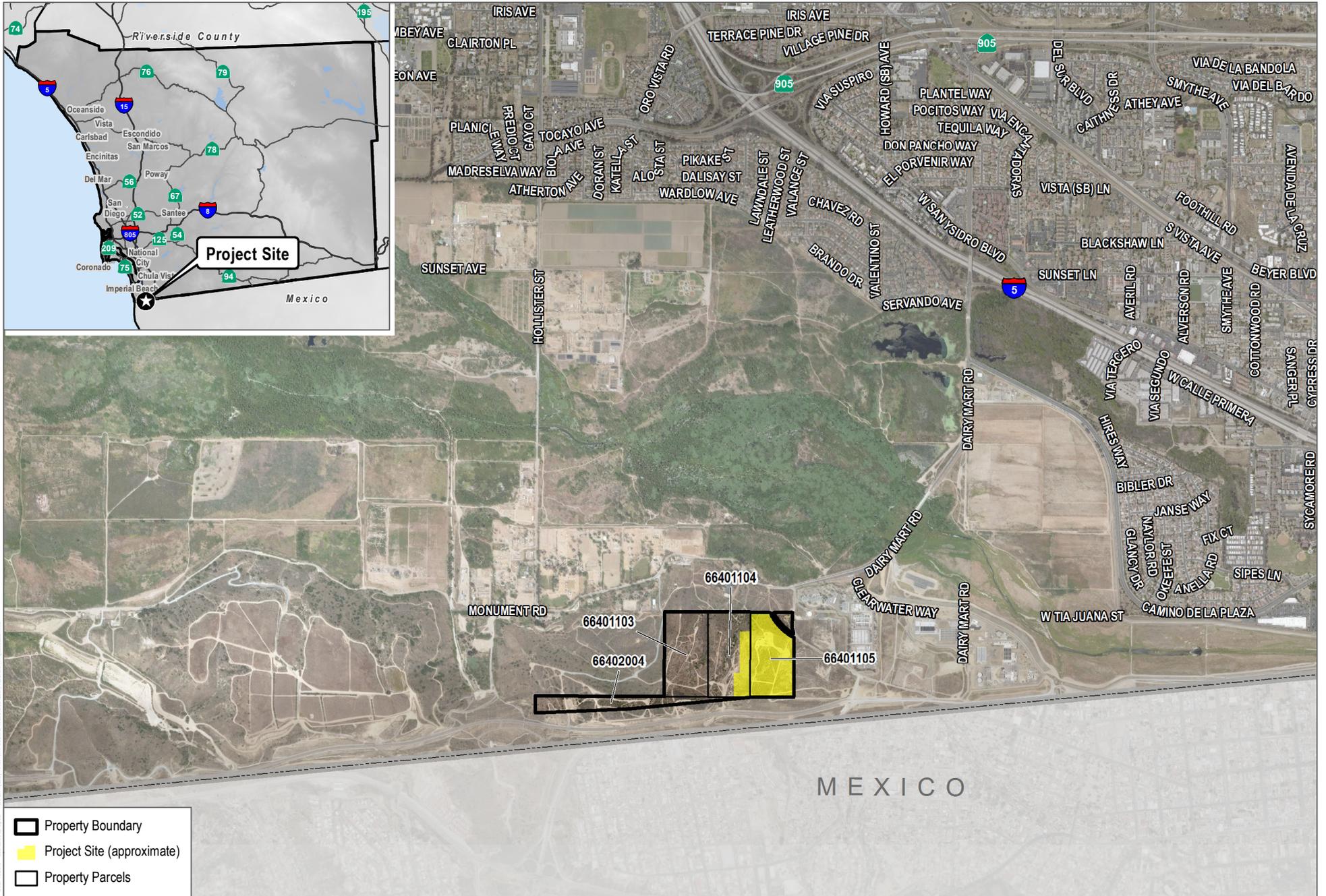
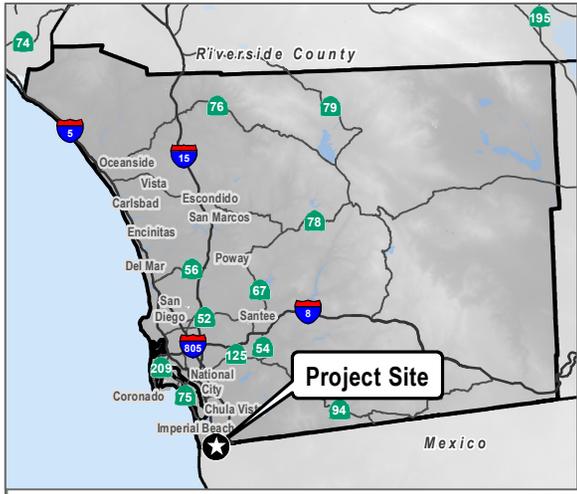
## **SCOPING MEETING**

Comments pertaining to the scope of the EIR may also be submitted at the EIR Scoping Meeting that will be held from **6:00 p.m. to 7:30 p.m. on Tuesday, April 30, 2019** at the following location:

Tijuana Estuary Visitor Center  
301 Caspian Way  
Imperial Beach, CA 91932

## **DEPARTMENT OF PARKS AND RECREATION CONTACT PERSON**

Lorena Warner-Lara  
California State Parks  
Tijuana River National Estuarine Research Reserve  
301 Caspian Way  
Imperial Beach, CA 91932-3149  
SDCD.CEQA@parks.ca.gov  
(619) 575-3613 x312



-  Property Boundary
-  Project Site (approximate)
-  Property Parcels

SOURCE: SANGIS 2017, 2019



May 16, 2019

Lorena Warner-Lara  
California State Parks  
Tijuana River National Estuarine Research Reserve  
301 Caspian Way  
Imperial Beach, CA 91932-3149

Subject: **CITY OF SAN DIEGO COMMENTS ON THE NOTICE OF PREPARATION FOR THE NELSON SLOAN QUARRY RESTORATION PROJECT (PROJECT)**

Dear Ms. Warner-Lara:

The City of San Diego (“City”) Planning Department has received the Notice of Preparation (NOP) prepared by California State Parks and distributed it to applicable City departments for review. The City, as a responsible agency under the California Environmental Quality Act (CEQA), has reviewed the NOP and appreciates this opportunity to provide comments to California State Parks. The City looks forward to continued coordination with California State Parks on this effort. For ease of reference, the City’s comments are organized by City Department issue areas.

**Planning Department**

**Rebecca Malone, AICP, Senior Planner, [RMalone@sanidiego.gov](mailto:RMalone@sanidiego.gov)**

1. Please include likely sediment haul routes and analyze impacts to City roads from heavy trucks as well as air quality, greenhouse gas emissions, and noise impacts from the delivery of sediment to the project site.

**Planning Department-Multiple Species Conservation Program (MSCP)**

**Kristy Forburger, Senior Planner, [kforburger@sanidiego.gov](mailto:kforburger@sanidiego.gov)**

1. The proposed project site is located within the City of San Diego’s Multi-Habitat Planning Area (MHPA) boundary. The City of San Diego MHPA was developed by the City in cooperation with the Wildlife Agencies, Property Owners, Developers, and Environmental Groups. The Preserve Design Criteria contained in the MSCP Plan and the City Council adopted criteria for the creation of the MHPA were used as guides in the development of the City’s MHPA. The Multi-Habitat Planning Area delineates core biological resource areas and corridors targeted for conservation.
2. The EIR should fully analyze all direct and indirect impacts to biological resources and MHPA boundaries. MHPA Guidelines, as described in the MSCP Subarea Plan,

that apply to the Tijuana River Valley (Sections 1.2.1 and 1.5.5) conserved as MHPA/open space should also be discussed in the EIR.

3. In the EIR, please assess the potential for narrow endemic species on the project site. Focused spring surveys should be required in any areas of the site showing a moderate to high potential for occurrence of these species/features. Avoidance of these species/features within the MHPA should be required.
4. Please ensure the EIR fully analyzes the project against Section 1.4.1, Compatible Land Uses of the MSCP Subarea Plan. The following land uses are considered conditionally compatible with the biological objectives of the MSCP and thus will be allowed within the City's MHPA:
  - Passive recreation
  - Utility lines and roads in compliance with policies in 1.4.2 below
  - Limited water facilities and other essential public facilities
  - Limited low density residential uses
  - Brush Management (Zone 2)
  - Limited agriculture
5. The EIR should include MSCP consistency analysis against Section 1.4.2 of the MSCP Subarea Plan, General Planning Policies and Design Guidelines; Section 1.5.2, General Management Directives; and Section 1.4.3, Land Use Adjacency Guidelines. In particular, lighting, drainage, landscaping, grading, access, and noise must not adversely affect the MHPA. Please address these issues in the EIR.

#### Lighting

Lighting should be directed away from the MHPA, and shielded if necessary. Please see Municipal Code §142.0740 for further information if needed.

#### Drainage

Drainage should be directed away from the MHPA, or if not possible, must not drain directly into the MHPA. Instead, runoff should flow into sedimentation basins, grassy swales or mechanical trapping devices prior to draining into the MHPA.

#### Landscaping

No invasive plant species shall be planted in or adjacent to the MHPA.

#### Grading

All manufactured slopes must be included within the development footprint and outside the MHPA.

#### Access

Access to the MHPA, if any, should be directed to minimize impacts and reduce impacts associated with domestic pet predation.

#### Noise

Due to the site's location adjacent and within the MHPA, construction noise will need to be avoided, if possible, during the breeding season of the California gnatcatcher (3/1-8/15), least Bell's vireo (3/15-9/15), southwestern willow flycatcher (5/1-8/30). If construction is proposed during the breeding season for the species, U.S. Fish and Wildlife Service protocol surveys will be required in order to determine species presence/absence. If the species *is/are* not identified within the MHPA, no additional measures will be required. If present, measures to minimize noise impacts will be required and should include temporary noise walls/berms. If a survey is not conducted and construction is proposed during the species' breeding season, presence would be assumed and a temporary wall/berm would be required. Noise levels from construction activities during the bird breeding season should not exceed 60 dBA hourly LEQ at the edge of the occupied MHPA, or the ambient noise level if noise levels already exceed 60 dBA hourly LEQ.

#### **Public Utilities Department**

**Keli Balo, Project Officer II, [kbalo@sandiego.gov](mailto:kbalo@sandiego.gov)**

1. The City of San Diego Public Utilities Department (PUD) owns and operates the South Bay Water Reclamation Plant (SBWRP) located at 2411 Dairy Mart Road, San Diego California.

<https://www.sandiego.gov/public-utilities/customer-service/water-wastewater-facilities>

2. PUD also maintains a number of underground utilities (water lines, sewer pipelines, recycled water and the South Bay Ocean Outfall) that are critical and essential for water conveyance and for treatment and handling of wastewater in the region.
3. The Nelson Sloan Quarry Restoration project site is located directly adjacent to the South Bay Water Reclamation Plant and has the potential to affect ongoing operations. Please evaluate and disclose potential noise, air quality, traffic, and hazardous material impacts. Please evaluate the potential traffic impacts including lane/road closures or other traffic related impacts that could affect operations and access to adjoining or adjacent properties in the area. Please also disclose and evaluate the potential air quality impacts expected during construction. Continued notification and communication with stakeholders in the area is necessary as the project details are refined. Please include the City of San Diego Public Utilities Department on the list of interested parties and include us in the distribution of the draft EIR.

#### **Transportation and Storm Water Department, Storm Water Division**

**Mark Stephens, Associate Planner – [MGStephens@sandiego.gov](mailto:MGStephens@sandiego.gov)**

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Ms. Lorena Warner-Lara

May 16, 2019

1. Under the Project Description heading on page 3, 2<sup>nd</sup> paragraph, the Notice of Preparation states "...Use of the project site for sediment placement by area stakeholders would ultimately be determined by an Operations and Maintenance Plan and multi-jurisdictional agreement. At this time, members of the agreement are anticipated to include CDPH, the City of San Diego, the County, USBIWC, US Customs and Border Protection, the San Diego Regional Water Quality Control Board, the California Department of Resources Recycling and Recovery, and potentially, site operators." We request clarification that these are potential members of such an agreement given their status as stakeholders in the Tijuana River Valley, but that we have not yet committed to being members of the agreement.

Thank you for the opportunity to provide comments on the NOP. Please feel free to contact Rebecca Malone, Senior Planner, directly via email at [RMalone@sandiego.gov](mailto:RMalone@sandiego.gov) or by phone at 619-446-5371 if there are any questions regarding the contents of this letter or if California State Parks would like to meet with City staff to further discuss the City's comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Heidi Vonblum".

Heidi Vonblum, Program Manager  
Planning Department

RM/rm

cc: Reviewing Departments (via email)  
Review and Comment online file



**CALIFORNIA DEPARTMENT OF PARKS AND RECREATION  
NELSON SLOAN QUARRY RESTORATION PROJECT  
SCOPING MEETING COMMENTS**

(Please hand in or mail back by May 16, 2019)

Name: Chris Helmer  
Organization (if any): City of Imperial Beach  
Address: 825 Imperial Beach Blvd  
City, State, Zip: Imperial Beach CA ~~91932~~ 91932  
Phone (optional): 619-628-1370  
E-mail (optional): chelmer@imperialbeach.ca.gov

Would you like to remain on our mailing list to receive future project updates? Yes  No

Comments The city of I.B. fully supports the Nelson Sloan Quarry Restoration Project, which is absolutely critical for sediment management in the Tijuana River valley. Local sediment control in the river valley is the most cost effective & sustainable solution to managing the waste material from sediment basins & flood control maintenance operations in the river valley.

Nelson Sloan Quarry provides a processing area to clean & sort sediment & a receiving site for lesser quality sediment that are not suitable for beneficial reuse or beach nourishment.

I would ask that to the extent feasible, sediment that is suitable for beach nourishment gets considered for placement on the beach.



May 15, 2019

Lorena Warner-Lara  
California State Parks  
Tijuana River National Estuarine Research Reserve  
301 Caspian Way  
Imperial Beach, CA 91932-3149

via email: [SDCD.CEQA@parks.ca.gov](mailto:SDCD.CEQA@parks.ca.gov)

**SUBJECT: Nelson Sloan Quarry Restoration Project, SDAS comments on the Notice of Preparation**

Dear Ms. Warner-Lara:

San Diego Audubon Society is very concerned with the habitat impacts of the deposition of sediments in the Tijuana River Valley. We greatly appreciate the efforts that State Parks has made to minimize the impacts of cross border sediment flows, especially at the Goat Canyon sediment recovery facility.

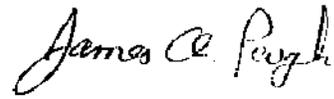
We appreciate that the proposed Quarry Restoration can make the sediment recovery operations less costly to operate and will reduce the environmental impacts of those operations. As such, we feel that the environmental impacts of the Nelson Sloan Quarry Restoration Project will be very positive. It will prevent erosion from the current quarry site; will replace weedy vegetation with native vegetation; will reduce the GHG and financial cost of disposal of sediments from Goat Canyon, other sediment recovery projects, and future wetland restoration projects. By making it easier and less costly to remove sediment from the Goat Canyon, the Nelson Sloan Project will help reduce the risk that a future storm will overpower the Goat Canyon Facility and deposit large amounts of additional sediment into the natural and restored wetlands of the Estuary. We feel that helping to reduce this risk of damage to wetlands is probably the most important environmental benefit of the Nelson Sloan Project. We hope that the EIR will fully identify and emphasize that environmental that benefit.

We strongly urge that the EIR fully identify the negative impacts of a No Project Alternative, not implementing the Nelson Sloan Restoration Project. That analysis should identify the increase in the risk that a major storm could result in an overflow of sediments into the Estuary. The quantities are likely to be much higher if the Nelson Sloan project is not implemented. That analysis should also include the quantity of GHGs that would be discharged because of having to transport the sediments off-site. The environmental analysis should also include the financial cost of the off-site transportation, because that additional cost would probably reduce the amount of sediment that can be removed, which would increase the likelihood of additional sediment flows into the Estuary.

If there is an alternative that would pose a significant delay before allowing the reuse of sediments, the increased risk that natural and restored wetlands due to the delay should be fully analyzed.

In case of questions or follow-up, the undersigned can be reached at 619-224-4591 or [peugh@cox.net](mailto:peugh@cox.net).

Respectfully,

A handwritten signature in black ink that reads "James A. Peugh". The signature is written in a cursive style with a large, prominent initial "J".

James A. Peugh  
Conservation Committee Chair



# County of San Diego

**BRIAN ALBRIGHT**  
DIRECTOR  
(658) 966-1301

**DEPARTMENT OF PARKS AND RECREATION**  
5500 OVERLAND AVENUE, SUITE 410, SAN DIEGO, CA 92123  
Administrative Office (858) 694-3030  
[www.sdparks.org](http://www.sdparks.org)

May 28, 2019

Lorena Warner-Lara  
California State Parks  
Tijuana River National Estuarine Research Reserve  
301 Caspian Way  
Imperial Beach, CA 91932-3149

Via email to: [Lorena.Warner-Lara@parks.ca.gov](mailto:Lorena.Warner-Lara@parks.ca.gov)

## **COMMENTS ON THE NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE NELSON SLOAN QUARRY RESTORATION PROJECT**

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Nelson Sloan Quarry Restoration Project Environmental Impact Report (EIR). The County of San Diego Department of Parks and Recreation (County DPR) has reviewed the NOP and has the following comments:

- County DPR requests that State Parks continue to consult with County DPR through the environmental studies, impacts analyses and development of mitigation measures. County DPR also requests that State Parks continue to invite County staff to scheduled meetings, including with stakeholders and the public.
- County DPR requests that State Parks continue to coordinate closely with County DPR to ensure the project does not adversely affect any planned community trails in the vicinity. Please see COSD Community Trails Master Plan for details of the exact locations of planned trails (<https://www.sandiegocounty.gov/content/sdc/pds/community-trails-master-plan.html>), or contact Meg Diss, County Trails Coordinator, at [Margaret.Diss@sdcunty.ca.gov](mailto:Margaret.Diss@sdcunty.ca.gov) for more information.



We look forward to receiving future documents related to this project and providing additional assistance at your request. If you have any questions regarding these comments, please contact Crystal Benham, Group Program Manager, at (858) 966-1370, or via email at [Crystal.Benham@sdcounty.ca.gov](mailto:Crystal.Benham@sdcounty.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Deborah Mosley". The signature is written in a cursive style with a large, stylized "D" and "M".

**Deborah Mosley**  
Chief of Resource Management  
County Department of Parks and Recreation



Gavin Newsom  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Kate Gordon  
Director

**Notice of Preparation**

April 17, 2019

To: Reviewing Agencies  
Re: Nelson Sloan Quarry Restoration Project  
SCH# 2019049100

Attached for your review and comment is the Notice of Preparation (NOP) for the Nelson Sloan Quarry Restoration Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

**Lorena Warner-Lara  
Parks and Recreation, Department of  
301 Caspian Way  
Imperial Beach, CA 91932**

with a copy to the State Clearinghouse in the Office of Planning and Research at [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov). Please refer to the SCH number noted above in all correspondence concerning this project on our website: <https://ceqanet.opr.ca.gov/2019049100/2>.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

cc: Lead Agency

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

2019049100

Project Title: Nelson Sloan Quarry Restoration Project

Lead Agency: California Department of Parks and Recreation Contact Person: Lorena Warner-Lara
Mailing Address: 301 Caspian Way Phone: 619-575-3613 x312
City: Imperial Beach Zip: 91932 County: San Diego

Project Location: County: San Diego City/Nearest Community: City of San Diego
Cross Streets: Dairy Mart Road and Monument Road Zip Code: 92154
Longitude/Latitude (degrees, minutes and seconds): 32 032 ' 32.84" N / 117 004 ' 18.06" W Total Acres: 23 (approximately)
Assessor's Parcel No.: 6640110500 and 6640110400 Section: 3 Twp.: 19S Range: 2W Base:
Within 2 Miles: State Hwy #: - Interstate 5 and 805 Waterways: Tijuana River
Airports: - Railways: - Schools: -

Document Type:

- CEQA: [X] NOP [ ] Draft EIR NEPA: [ ] NOI Other: [ ] Joint Document
[ ] Early Cons [ ] Supplement/Subsequent EIR [ ] EA [ ] Final Document
[ ] Neg Dec (Prior SCH No.) [ ] Draft EIS [ ] Other:
[ ] Mit Neg Dec Other:

Local Action Type:

- [ ] General Plan Update [ ] Specific Plan [ ] Rezoning [ ] Annexation
[ ] General Plan Amendment [ ] Master Plan [ ] Prezone [ ] Redevelopment
[ ] General Plan Element [ ] Planned Unit Development [ ] Use Permit [ ] Coastal Permit
[ ] Community Plan [ ] Site Plan [ ] Other: Grading Permit

Governor's Office of Planning & Research

After 12PM APR 16 2019

STATE CLEARINGHOUSE

Development Type:

- [ ] Residential: Units Acres
[ ] Office: Sq.ft. Acres Employees
[ ] Commercial: Sq.ft. Acres Employees
[ ] Industrial: Sq.ft. Acres Employees
[ ] Educational:
[ ] Recreational:
[ ] Water Facilities: Type MGD
[ ] Transportation: Type
[ ] Mining: Mineral
[ ] Power: Type MW
[ ] Waste Treatment: Type MGD
[ ] Hazardous Waste: Type
[X] Other: Restoration of inactive quarry site

Project Issues Discussed in Document:

- [X] Aesthetic/Visual [ ] Fiscal [X] Recreation/Parks [X] Vegetation
[X] Agricultural Land [X] Flood Plain/Flooding [X] Schools/Universities [X] Water Quality
[X] Air Quality [X] Forest Land/Fire Hazard [ ] Septic Systems [X] Water Supply/Groundwater
[X] Archeological/Historical [X] Geologic/Seismic [ ] Sewer Capacity [X] Wetland/Riparian
[X] Biological Resources [X] Minerals [X] Soil Erosion/Compaction/Grading [X] Growth Inducement
[X] Coastal Zone [X] Noise [X] Solid Waste [X] Land Use
[X] Drainage/Absorption [X] Population/Housing Balance [X] Toxic/Hazardous [X] Cumulative Effects
[ ] Economic/Jobs [X] Public Services/Facilities [X] Traffic/Circulation [ ] Other:

Present Land Use/Zoning/General Plan Designation:

Inactive sand and gravel quarry, vacant land, open space/AR-1-1 (Agricultural - Residential)/Parks, Open Space, & Recreation

Project Description: (please use a separate page if necessary)
see separate page "Nelson Sloan Quarry Restoration Project NOC Project Description"

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

**NOP Distribution List**

County: San Diego

SCH# 2019049100

Resources Agency

- Resources Agency  
Nadell Gayou
- Dept. of Boating & Waterways  
Denise Peterson
- California Coastal Commission  
Allyson Hitt
- Colorado River Board  
Elsa Contreras
- Dept. of Conservation  
Crina Chan
- Cal Fire  
Dan Foster
- Central Valley Flood Protection Board  
James Herota
- Office of Historic Preservation  
Ron Parsons
- Dept of Parks & Recreation  
Environmental Stewardship Section
- S.F. Bay Conservation & Dev't. Comm.  
Steve Goldbeck
- Dept. of Water Resources  
Resources Agency  
Nadell Gayou

- Fish & Wildlife Region 4  
Julie Vance
- Fish & Wildlife Region 5  
Leslie Newton-Reed  
Habitat Conservation Program
- Fish & Wildlife Region 6  
Tiffany Ellis  
Habitat Conservation Program
- Fish & Wildlife Region 6 i/m  
Heidi Calvert  
Inyo/Mono. Habitat Conservation Program
- Dept. of Fish & Wildlife M  
William Paznokas  
Marine Region

Other Departments

- California Department of Education  
Lesley Taylor
- OES (Office of Emergency Services)  
Monique Wilber
- Food & Agriculture  
Sandra Schubert  
Dept. of Food and Agriculture
- Dept. of General Services  
Cathy Buck  
Environmental Services Section
- Housing & Comm. Dev.  
CEQA Coordinator  
Housing Policy Division

Independent Commissions, Boards

- Delta Protection Commission  
Erik Vink
- Delta Stewardship Council  
Anthony Navasero
- California Energy Commission  
Eric Knight

- Native American Heritage Comm.  
Debbie Treadway
- Public Utilities Commission  
Supervisor
- Santa Monica Bay Restoration  
Guangyu Wang
- State Lands Commission  
Jennifer Deleong
- Tahoe Regional Planning Agency (TRPA)  
Cherry Jacques

Cal State Transportation Agency CalSTA

- Caltrans - Division of Aeronautics  
Philip Crimmins
- Caltrans - Planning  
HQ MD-IGR  
Christian Bushong
- California Highway Patrol  
Suzann Ikeuchi  
Office of Special Projects

Dept. of Transportation

- Caltrans, District 1  
Rex Jackman
- Caltrans, District 2  
Marcelino Gonzalez
- Caltrans, District 3  
Susan Zarich
- Caltrans, District 4  
Patricia Maunce
- Caltrans, District 5  
Larry Newland
- Caltrans, District 6  
Michael Navarro
- Caltrans, District 7  
Dianna Watson
- Caltrans, District 8  
Mark Roberts

- Caltrans, District 9  
Gayle Rosander
- Caltrans, District 10  
Tom Dumas
- Caltrans, District 11  
Jacob Armstrong
- Caltrans, District 12  
Maureen El Herake

Cal EPA

- Air Resources Board
- Airport & Freight  
Jack Wursten
- Transportation Projects  
Neemani Kalandiyur
- Industrial/Energy Projects  
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- California Department of Resources, Recycling & Recovery  
Kevin Taylor/Jeff Esquivel
- State Water Resources Control Board  
Regional Programs Unit  
Division of Financial Assistance
- State Water Resources Control Board  
Cindy Forbes - Asst Deputy  
Division of Drinking Water
- State Water Resources Control Board  
Div. Drinking Water # \_\_\_\_\_
- State Water Resources Control Board  
Student Intern, 401 Water Quality Certification Unit  
Division of Water Quality
- State Water Resources Control Board  
Phil Crader  
Division of Water Rights
- Dept. of Toxic Substances  
Control Reg. # \_\_\_\_\_  
CEQA Tracking Center
- Department of Pesticide Regulation  
CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

- RWQCB 1  
Cathleen Hudson  
North Coast Region (1)
- RWQCB 2  
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San Francisco Bay Region (2)
- RWQCB 3  
Central Coast Region (3)
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- RWQCB 5S  
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- RWQCB 5F  
Central Valley Region (5)  
Fresno Branch Office
- RWQCB 5R  
Central Valley Region (5)  
Redding Branch Office
- RWQCB 6  
Lahontan Region (6)
- RWQCB 6V  
Lahontan Region (6)  
Victorville Branch Office
- RWQCB 7  
Colorado River Basin Region (7)
- RWQCB 8  
Santa Ana Region (8)
- RWQCB 9  
San Diego Region (9)

Other \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
 Conservancy



U.S. FISH AND WILDLIFE SERVICE  
Carlsbad Fish and Wildlife Office  
2177 Salk Avenue, Suite 250  
Carlsbad, California 92008



CALIFORNIA DEPARTMENT OF  
FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, California 92123

In Reply Refer to:  
FWS/CDFW-SDG-19B0156-19TA0982

May 24, 2019  
*Sent via email*

Ms. Lorena Warner-Lara  
California Department of Parks and Recreation  
301 Caspian Way  
Imperial Beach, California 91932  
[lorena.warner-lara@parks.ca.gov](mailto:lorena.warner-lara@parks.ca.gov)

Subject: Comments on the Notice of Preparation of an Environmental Impact Report for the Nelson Sloan Quarry Restoration Project

Dear Ms. Warner-Lara:

The U.S Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), hereafter collectively referred to as the Wildlife Agencies, have reviewed the above-referenced Notice of Preparation (NOP) dated April 17, 2019. The Wildlife Agencies appreciate the extension of the comment period to May 24, 2019. The project details and comments provided herein are based on the information provided in the NOP, our knowledge of the sensitive biological resources on the Nelson Sloan Quarry (Quarry) and surrounding region, and our participation in the Multiple Species Conservation Program (MSCP) and the City of San Diego's (City) MSCP Subarea Plan (SAP).

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), including habitat conservation plans (HCPs) developed under section 10(a)(1) of the Act.

The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; §§15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the state's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA) and other sections of the Fish and Game Code. The Department also administers the Natural Community Conservation Planning (NCCP) Program.

The Quarry is located on County of San Diego (County)-owned land that lies within the City of San Diego's (City) Multi-Habitat Planning Area (MHPA or preserve). In 1982, the City approved a Conditional Use Permit and reclamation plan for a sand and gravel quarry on the project site.

The Quarry operated for twenty years (1982-2002) and following active operations, the County of San Diego (County) purchased the property from the City. Per the terms of the sale and recorded agreement, the property is to be used in perpetuity for habitat protection and open space. The County and the City have worked with State of California Division of Mine Reclamation to reclaim the quarry since 2002.

The proposed 72-acre project site consists of four parcels: Assessor's Parcel Numbers (APNs) 664-011-05-00, 664-011-04-00, 664-011-03-00, and 664-020-04-00 within the southeastern corner of Tijuana River Valley Regional Park, approximately 400 feet south of the intersection of Monument Road and old Dairy Mart Road. The project site abuts Monument Road and the City's South Bay Water Reclamation Plant on the east. The U.S. International Boundary and Water Commission's South Bay International Wastewater Treatment Plant is approximately 0.25-mile to the east. Federal lands managed by U.S. Customs and Border Protection are located to the south and County lands are located to the west and north.

California State Parks and Recreation (CSP) proposes to reclaim the Quarry by: 1) placing up to 1,000,000 cubic yards of sediment excavated from flood control facilities and other restoration projects in the Tijuana River Valley to stabilize the existing slope; and 2) restoring the sediment placement areas to coastal sage scrub and other native habitats. The project encompasses four parcels, however, proposed reclamation and restoration would occur entirely on the two eastern-most parcels (i.e., APNs 664-011-05-00 and 664-011-04-00). Reclamation of the quarry is expected to extend a period of 10 to 15 years.

The project site currently supports coastal sage scrub, maritime succulent scrub, and southern riparian scrub that has recruited naturally since the cessation of reclamation activities. The site is also crisscrossed by informal dirt roads and a north/south cut slope dissects the quarry on APN 664-011-04-00. One individual and four pairs of coastal California gnatcatchers (*Polioptila californica californica*; gnatcatcher, federally listed as threatened and a California Species of Concern) as well as five adult Quino checkerspot butterfly (*Euphydryas editha quino* (= *E. e. wrighti*); Quino, federally listed as endangered), were found onsite in 2019 (Dudek 2019, Mulligan 2019, pers. comm.).

Our main concern is the proposed impacts to the MHPA. The MSCP delineated the MHPA as core biological resource areas. Projects impacting MHPA should provide an overall benefit that is superior to the existing habitat values of the current MHPA. CSP advocates the proposed quarry reclamation as providing multiple benefits, including the re-use of the sediment, habitat restoration, reduced maintenance costs, and improvement of conditions for downstream communities. As the project moves forward, CSP should ensure impacts to the MHPA are reduced as much as possible and short- and long-term project benefits outweigh the temporary loss of the habitat onsite and the value of the existing habitat to the MHPA as a whole.

At this point, it is unclear how potential impacts to federally listed species will be addressed. If the City has direct control over the project, impacts to covered species (e.g., gnatcatcher) can be addressed under the City's SAP. However, Quino is not a covered species under the City's SAP

and potential impacts to this species may be addressed through either section 7 (if a there is a federal nexus) or section 10 of the Act.

We offer additional comments and recommendations in the Appendix to assist CSP in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and to ensure that the project is consistent all applicable requirements of the approved subarea plan.

We appreciate the opportunity to comment on this NOP. We are hopeful that further coordination between us will ensure the protection we find necessary for the biological resources that would be affected by this project. To that end, we request a meeting with the CSP, Wildlife Agencies, County and City. If you have questions or comments regarding this letter, please contact Patrick Gower of the Service (760) 431-9440 or Meredith Osborne of the Department at (858) 636-3163.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gail K. Sevens", is displayed on a light blue rectangular background.

for: Karen A. Goebel  
Assistant Field Supervisor  
U.S. Fish and Wildlife Service

Gail K. Sevens  
Environmental Program Manager  
California Department of Fish and Wildlife

cc: State Clearinghouse, Sacramento

## Appendix

### **Wildlife Agency Comments and Recommendations on the Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the Nelson Sloan Quarry Restoration Project**

#### **General Comments**

To enable us to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR:

1. A complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas.
2. A complete list and assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying State or federally listed rare, threatened, endangered, or proposed candidate species, California Species-of-Special Concern, State Protected or Fully Protected species, and any locally unique species and sensitive habitats. Specifically, the DEIR should include:
  - a. A thorough assessment of Rare Natural Communities on site and within the area of impact. We recommend following the California Department of Fish and Wildlife's Guidelines for Assessing Impacts to Rare Plants and Rare Natural Communities.
  - b. A thorough, recent floristic-based assessment of special status plants and natural communities, following the Department's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <https://www.wildlife.ca.gov/Conservation/Plants/Info>). The Department recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the project site and neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2008<sup>1</sup>). Alternately, for assessing vegetation communities located in western San Diego County, the Vegetation Classification Manual for Western San Diego County (Sproul et al. 2011<sup>2</sup>) may be used. Adjoining habitat

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1 Sawyer, J. O., T. Keeler-Wolf and J.M. Evens. 2009. A Manual of California Vegetation, Second Edition. California Native Plant Society Press, Sacramento.

2 Sproul, F., T. Keeler-Wolf, P. Gordon-Reedy, J. Dunn, A. Klein and K. Harper. 2011. Vegetation Classification Manual for Western San Diego County. First Edition. Prepared by AECOM, California Department of Fish and Game Vegetation Classification and Mapping Program and Conservation Biology Institute for San Diego Association of Governments.

- areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
- c. A current inventory of the biological resources associated with each habitat type on site and within the area of impact.
  - d. An inventory of rare, threatened, and endangered species on site and within the area of impact.
  - e. Discussions regarding seasonal variations in use by sensitive species of the project site as well as the area of impact on those species, using acceptable species-specific survey procedures as determined through consultation with the Wildlife Agencies. Focused species-specific surveys, conducted in conformance with established protocols at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required.
3. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources. All facets of the project should be included in this assessment. Specifically, the DEIR should provide:
- a. Specific acreage and descriptions of the types of wetlands, coastal sage scrub, and other sensitive habitats that will or may be affected by the proposed project or project alternatives. Maps and tables should be used to summarize such information.
  - b. Discussions regarding the regional setting, pursuant to the CEQA Guidelines, Section 15125(a), with special emphasis on resources that are rare or unique to the region that would be affected by the project. This discussion is critical to an assessment of environmental impacts.
  - c. Detailed discussions, including both qualitative and quantitative analyses, of the potentially affected listed and sensitive species (fish, wildlife, plants), and their habitats on the proposed project site, area of impact, and alternative sites, including information pertaining to their local status and distribution. The anticipated or real impacts of the project on these species and habitats should be fully addressed.
  - d. Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed NCCP reserve lands. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated and provided. A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion

- and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.
- e. Discussions regarding possible conflicts resulting from wildlife-human interactions at the interface between the development project and natural habitats. The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions.
  - f. An analysis of cumulative effects, as described under CEQA Guidelines, Section 15130. General and specific plans, and past, present, and anticipated future projects, should be analyzed concerning their impacts on similar plant communities and wildlife habitats.
  - g. An analysis of the effect that the project may have on implementation of regional and/or subregional conservation programs. We recommend that the Lead Agency ensure that the development of this and other proposed projects do not interfere with the goals and objectives of established long-term preserves (e.g., MHPA) and that projects conform with other requirements of the NCCP program.
4. The DEIR should include mitigation measures for unavoidable adverse project-related impacts on sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance, and where avoidance is infeasible, reduction of project impacts. For unavoidable impacts, off-site mitigation through acquisition and preservation in perpetuity of the affected habitats should be addressed. We generally do not support the use of relocation, salvage, and/or transplantation as mitigation for impacts on rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.

### Specific Comments

1. The Quarry is located on County-owned land that lies within the City's MHPA. The City is participating in the Department's NCCP and the Service's HCP programs through implementation of its SAP. The DEIR must ensure and verify that all requirements and conditions of the City's SAP and Implementing Agreement (IA) are met. Biological issues that are not addressed in the SAP and IA, such as specific impacts to and mitigation requirements for wetlands or sensitive species and habitats that are not covered by the SAP and IA also will need to be addressed. In addition, the DEIR should describe why the proposed project, irrespective of other alternatives to the project, is consistent with and appropriate in the context of the SAP. The City should be included in review of the CEQA document (if required) and would comment on SAP consistency through public review as a responsible agency.
2. Quino adults and the Quino host plant, dot-seed plantain (*Plantago erecta*), were incidentally observed during a rare plant survey on April 2, 2019, on the mesa adjacent to

the Quarry (Mulligan 2019, pers. comm.). Small patches of the host plant were also found in the excavated portion of the Quarry. We recommend that protocol surveys of the project site for Quino be completed. The DEIR should describe how direct and indirect effects on Quino will be avoided or minimized during staging, sediment transport, and filling activities. We recommend that protocol surveys for Quino be completed.

3. Protocol surveys in February 2019 identified one individual and four pairs of gnatcatcher on site (Dudek 2109). Two plant communities on site were identified as highly suitable gnatcatcher habitat: Diegan coastal sage scrub and maritime succulent scrub. These communities are located on the mesa above the excavated portion of the project site that is proposed to be filled. The vegetation communities occurring in the excavated portion were classified as “disturbed coastal sage scrub” and “disturbed land”. The gnatcatcher surveys were conducted only in vegetation that was defined by Dudek as suitable habitat. The DEIR should consider the potential for future gnatcatcher habitat value of the disturbed CSS on site should recruitment be allowed to continue naturally or should enhancement of the existing vegetation be performed as an alternative to filling and revegetating the Quarry. The DEIR should address the temporal loss of habitat over the course of filling the quarry and how the project will implement staging of habitat restoration corresponding to phases of the project, as well as integrate proposed habitat restoration with the existing habitat found on site.
4. The DEIR should include a complete analysis of the suitability of the recovered sediment as a substrate for restoration of native habitat with particular regard to *Plantago erecta*. The NOP states that sediment would be hauled to a staging area at the project site where it would be stored until determined to be acceptable or unacceptable for deposit in the Quarry. Unacceptable sediment would then be hauled offsite to be utilized for other purposes not related to the project. The DEIR should include a description of how the collected sediment would be deemed suitable or unsuitable for use in filling the quarry and how the accepted sediment would ultimately be made suitable for establishment of native vegetation.
5. The DEIR should include alternatives that avoid or minimize impacts to MHPA. Alternative sites should include agricultural and/or disturbed lands within the Tijuana River valley that are not identified in the City’s SAP for habitat restoration (section 1.2.1, MHPA Guidelines A18 and A19; and section 1.5.5, Specific Management Directives for the Tijuana River Valley, River Corridor, Priority 2, and Directive 3). We recommend meeting with the City, County and Wildlife Agencies to plan where habitat restoration will occur and sites that could benefit from being raised out of the flood plain with sediments from the project.
6. The DEIR should consider the feasibility of restoring habitat for Quino and gnatcatcher using the recovered sediment as substrate. The DEIR should include plans for restoration and revegetation, to be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) soils selection criteria; (b) the plant species to be used, container sizes, and

seeding rates; (c) a figure depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria (e.g., percent cover of native and non-native species; species richness); (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

Because of the uncertainty of restoring habitats on recovered sediments, and the likely significant temporal loss of habitat associated with project phasing, we recommend that Spooner's Mesa be considered for restoration as envisioned in the City's SAP (section 1.2.1, MHPA Guideline A17).

7. The DEIR should include information on both the restoration and long-term management of the Quarry including a description of management activities and mechanism to be used for funding in perpetuity.
8. All construction and post-construction best management practices (BMPs) should be located within the development footprint (i.e., included in the impact analysis as loss of habitat). The DEIR should include a figure depicting the location of BMPs in relation to the development footprint.
9. If avoidance of the avian breeding season is not feasible, the Wildlife Agencies recommend surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

### **LITERATURE CITED**

Dudek, 2019. 2019 Focused Coastal California Gnatcatcher Survey Report for the Proposed Nelson Sloan Quarry Project, County of San Diego.

#### **Personal communications:**

Mulligan, M. 2019. Quino checkerspot butterfly observation April 2, 2019-incident. Email dated April 3, 2019 to Stacy Love.



CALIFORNIA DEPARTMENT OF PARKS AND RECREATION  
NELSON SLOAN QUARRY RESTORATION PROJECT  
SCOPING MEETING COMMENTS

(Please hand in or mail back by May 16, 2019)

Name: Jim Peugh  
Organization (if any): San Diego Audubon Society  
Address: 2776 Nipona Street  
City, State, Zip: San Diego, CA, 92106  
Phone (optional): 619-224-4591  
E-mail (optional): peugh@cox.net

Would you like to remain on our mailing list to receive future project updates? Yes  No

Comments I think that this project has very positive impacts and is long overdue. Not doing the project, or delaying its implementation will have significant negative environmental impacts. I urge that the EIR fully assess the negative impacts of the no project alternative and separately of delaying the implementation of the project. A few of the negative impacts of "no project" are:  
Unnecessary GHGs from timber sail away  
Additional sediments flowing into the estuary  
Unnecessary erosion from the current condition of the Quarry  
etc.  
Please fully analyze the negative impacts of not doing this project or delaying it.



