



November 21, 2019

Governor's Office of Planning & Research

Mr. Robert Hingtgen
County of San Diego Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

NOV 21 2019

STATE CLEARINGHOUSE

Copy sent via email: Robert.Hingtgen@sdcounty.ca.gov

SUBJECT: Cottonwood Sand Mining Project (SCH# 2019100513); Notice of Preparation (NOP) and Initial Study

Dear Mr. Hingtgen,

Thank you for including the Department of Conservation's Division of Mine Reclamation (Division) in the environmental review process for the Cottonwood Sand Mining Project Notice of Preparation (NOP) and Initial Study. The project as described in these documents proposes to convert two golf courses to a sand mining operation that proposes to extract 4.8 million cubic yards of material and process the material on site. This includes the construction of a processing plant consisting of aggregate screening and washing facilities, three settling ponds, loadout area, support structures and buildings, mobile conveyor line, and the development of an access road.

Approximately 214 acres of the 280-acre property would be subject to a reclamation plan and financial assurances, where mined lands would be excavated and reclaimed by grading and revegetation. Extraction of aggregate would occur in three continuous phases and is expected to be completed after approximately 10 years. As proposed, reclamation would begin in the second year as mining proceeds to the east, would be continuous throughout the term of the operation, and would end two years after mining activities cease.

The Division has review responsibilities associated with lead agency implementation of the Surface Mining and Reclamation Act of 1975 (SMARA). SMARA provides a comprehensive surface mining and reclamation policy to assure that adverse environmental impacts are minimized, and mined lands are reclaimed. The Division's primary focus is on surface mining operations and the return of those mined lands to a usable and safe condition; however, the Division also addresses issues related to abandoned (pre-1976) legacy mines.

The Division has reviewed the subject NOP and Initial Study pursuant to the California Environmental Quality Act (CEQA) and State CEQA Guidelines and offers no comments on these documents at this time.

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The following comments apply to the plot maps and draft reclamation plan included with the NOP. Pursuant to Public Resources Code (PRC) Section 2772.1(a), the Division looks forward to receiving submittal of the proposed reclamation plan, certified as a complete submission and in compliance with applicable statutes, regulations, and local ordinances from the County of San Diego, the lead agency under SMARA. Please note that PRC Section 2772.1(a)(1) requires the SMARA lead agency to submit the reclamation plan to the Division Supervisor "as early as practicable in order to facilitate the lead agency's review of the reclamation plan pursuant to the California Environmental Quality Act.... All documentation for the submission shall be submitted to the supervisor at one time." This will help ensure the County's environmental review coincides with the Division's review of the reclamation plan pursuant to SMARA.

Please include the Division on the distribution list for this project and send the Division any subsequent project documents (e.g., hearing notices or supplemental environmental documents), as well as a copy of the draft and final Environmental Impact Report to the address below.

If you have any questions, please contact either of us at (916) 323-9198.

Sincerely,



Carol E. Atkins, Manager
Environmental Services Unit



Paul Fry, Manager
Engineering and Geology Unit

cc (provided electronically):

Department of Conservation, Office of Legislative and Regulatory Affairs

State Office of Planning and Research (state.clearinghouse@opr.ca.gov)