



# San Diego County Air Pollution Control District

August 21, 2023

County of San Diego Planning & Development Services  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123  
Attn: Christopher Jacobs  
[christopher.jacobs@sdcounty.ca.gov](mailto:christopher.jacobs@sdcounty.ca.gov)

Re: Cottonwood Sand Mine PDS2018-MUP-18-023; PDS2018-RP-18-001; Log No. PDS2018-ER-18-19-007; SCH# 2019100513 Recirculated Draft EIR

Dear Mr. Jacobs,

The San Diego County Air Pollution Control District (District) appreciates the opportunity to provide comments on the proposed Cottonwood Sand Mine project. The District requests a response when specific comments are made that reference a section of the CEQA document. General comments contained in this letter are for information/education of District rules and requirements and do not require a response. The District decision to comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which the District does not submit comments.

#### Project Description as Described by the District

The Cottonwood Sand Mine Project (project) is located in the unincorporated portion of the County, in the Valle De Oro Community Planning Area. The Project proposes to convert the two golf courses within the Cottonwood Golf Club to a sand mining operation that would be conducted in three phases over 10 years. Approximately 214.4 acres of the approximately 280-acre site are proposed for extractive use.

#### General Information About the District

The District is mandated under federal and state law to regulate air pollutant emissions and improve air quality to protect public health and the environment. Accordingly, the District operates countywide air quality permitting, monitoring, and enforcement programs to ensure compliance with applicable air pollution regulations for healthful air quality. The District's jurisdiction covers all of San Diego County, including both the incorporated and unincorporated areas.

#### Specific Comment on Air Quality Summary on Page S-14 – S-17

The re-circulated draft environmental impact report (RDEIR) indicates operational emissions were re-modeled to account for more truck trips and sand extraction activities and fugitive dust emissions were changed based on guidance from SDAPCD. Therefore, Table S-2 (Operational Emissions) and Table S-3 (Health Risks from TAC Emissions) were revised. However, the modified air quality analysis was not re-circulated, so the District is unable to verify all the suggested changes were made.

The RDEIR also indicated an additional 58 truck trips per day would be required for operational needs. Although the re-modeled operational emissions show values under the screening level thresholds, the District recommends whenever possible to use zero emission technology or the cleanest tier 4 engines to minimize the impacts on the surrounding community.

#### General Information About Equipment Potentially Requiring Permits

The District's permitting program has been established to minimize air pollution by specifying operating and compliance requirements for stationary and portable sources that emit air contaminants. District [Rule 10<sup>1</sup>](#) requires that any person building, erecting, altering or replacing any article, machine, equipment or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants, shall first obtain written authorization for such construction from the District. Examples of air contaminants include carbon monoxide, lead, nitrogen dioxide, ozone, particulate matter, sulfur dioxide or toxic air contaminants, which can negatively impact public health. District [Rule 11<sup>2</sup>](#) lists exemptions for equipment or processes that do not emit a significant amounts of air pollutants.

#### Specific Comment on Permitting

This project will likely require a permit with the District and will be evaluated per District [Rule 1200<sup>3</sup>](#). Rule 1200 applies to any new, relocated, or modified emission unit which may increase emissions of one or more toxic air contaminant(s) and for which an Authority to Construct or Permit to Operate is required. The evaluation of a project for compliance with Rule 1200 will require a health risk assessment.

#### General Information About Dust

Projects or operations that can generate fugitive dust emissions may be subject to the following District rules:

- District [Rule 50<sup>4</sup>](#) *Visible Emissions*, which states air contaminants shall not be discharged into the atmosphere for a period or periods aggregating more than three minutes in any period of 60 consecutive minutes which is darker in shade than a number 1 on the Ringlemann Chart (20% opacity).
- District [Rule 51<sup>5</sup>](#), *Nuisance*, which states “*a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property. The provisions of this rule do not apply to odors emanating from agricultural operations in the growing of crops or raising of fowls or animals.*”

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<sup>1</sup> SDAPCD Rule 10 - <https://www.sdapcd.org/content/dam/sdapcd/documents/rules/current-rules/Rule-10.pdf>

<sup>2</sup> SDAPCD Rule 11 - <https://www.sdapcd.org/content/dam/sdapcd/documents/rules/current-rules/Rule-11.pdf>

<sup>3</sup> SDAPCD Rule 1200 - <https://www.sdapcd.org/content/dam/sdapcd/documents/rules/current-rules/Rule-1200.pdf>

<sup>4</sup> SDAPCD Rule 50 - <https://www.sdapcd.org/content/dam/sdapcd/documents/rules/current-rules/Rule-50.pdf>

<sup>5</sup> SDAPCD Rule 51 - <https://www.sdapcd.org/content/dam/sdapcd/documents/rules/current-rules/Rule-51.pdf>

Please note the District has received complaints in the past in regard to sand, rock and aggregate operations when in close proximity to residences. Common factors which contribute to these complaints are proximity and elevation of a project in relation to residences, wind patterns, air pollution controls or mitigations implemented and moisture content of haul roads and aggregate processing lines and piles. The District would like to reiterate the importance of the Fugitive Dust Control Plan from the original DEIR to mitigate potential issues. Measures included in the Fugitive Dust Control Plan include but are not limited to: designating a Fugitive Dust Control Site Coordinator to respond to dust-related concerns of neighboring property owners and monitor the effectiveness of the dust control measures; implementing control measures related to vehicle travel on unpaved roads, such as limiting vehicle speeds, watering roadways, and applying soil stabilizers; implementing control measures related to vehicle travel on paved roads, such as limiting vehicle speeds, sweeping roadways, and/or utilizing rumble grates and wheel washers; and conducting employee and contractor awareness training.

In addition to the rules listed above, any commercial construction or demolition activity capable of generating fugitive dust emissions may be subject to District [Rule 55<sup>6</sup>](#), *Fugitive Dust Control*. This rule has restrictions for airborne dust beyond the property line and visible roadway dust as a result of active operations, spillage from transport trucks, erosion, or track-out/carry-out.

#### General Information About Off-Road Construction Equipment

Any project using off-road vehicles that are diesel-powered, self-propelled, and 25 horsepower or greater must be registered under the current owner with the California Air Resources Board (CARB) Diesel Off-Road Online Reporting System (DOORS). Each vehicle is assigned an Equipment Identification Number (EIN) which must be labeled on both sides of the vehicle. Fleets must meet emission targets.

Fleets must limit their unnecessary idling to 5 minutes; there are exceptions for vehicles that need to idle to perform work (such as a crane providing hydraulic power to the boom), vehicles being serviced, or in a queue waiting for work.

Written Idling Policy – Medium fleets (total max hp 2,501 – 5,000) and large fleets (total max hp greater than 5,000 hp) must also have a written idling policy that is made available to operators of the vehicles and informs them that idling is limited to 5 consecutive minutes or less.

We appreciate the opportunity to comment on this project. Should you have any questions about these comments or District requirements please contact Supervising Air Resources Specialist, Eric Luther (858) 586-2893 or [eric.luther@sdapcd.org](mailto:eric.luther@sdapcd.org).

Sincerely,



Eric Luther  
Supervising Air Resources Specialist

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<sup>6</sup> SDAPCD Rule 55 - <https://www.sdapcd.org/content/dam/sdapcd/documents/rules/current-rules/Rule-55.pdf>