

Ehsan, Beth

From: Loy, Maggie A
Sent: Wednesday, October 08, 2014 10:02 AM
To: Ehsan, Beth
Cc: Sibbet, David
Subject: FW: [Website Feedback]: No. County Environmental Recycling Facility (NCER)

For the record.

From: Kohatsu, Sachiko
Sent: Wednesday, October 08, 2014 9:54 AM
To: Loy, Maggie A
Subject: FW: [Website Feedback]: No. County Environmental Recycling Facility (NCER)

Good morning, Maggie~

Please note Diana Towne's comment below

Thank you,
Sachiko

Sachiko Kohatsu

Policy Aide
Supervisor Dave Roberts
1600 Pacific Highway, Room 335
San Diego, CA 92101
(619) 531-5533 Phone
(619) 531-5859 Direct
(619) 234-1559 Fax
sachiko.kohatsu@sdcounty.ca.gov
www.supervisordaveroberts.com



Find Supervisor Dave Roberts on Facebook



Follow Supervisor Dave Roberts on Twitter

On Oct 7, 2014, at 8:36 PM, Roberts, Dave <Dave.Roberts@sdcounty.ca.gov> wrote:

Mike - Let me have county staff check and we will get back to you. Dave

Dave Roberts
Supervisor
San Diego County Board of Supervisors, District 3
1600 Pacific Highway, Room 335
San Diego, CA 92101
619-531-5533
www.SupervisorDaveRoberts.com

From: Michael Morasco [Mmorasco@ci.escondido.ca.us]
Sent: Tuesday, October 07, 2014 8:30 PM
To: Roberts, Dave
Subject: Fwd: [Website Feedback]: No. County Environmental Recycling Facility (NCER)

Tried to send this to you and Bill but guess first email was not valid. Here is what was meant for both of you. Comment..Thanks

Michael Morasco
Escondido City Council
District 4 Representative
<http://www.happybirthday.escondido.org/>
Sent from my iPhone

Begin forwarded message:

From: Michael Morasco <Mmorasco@ci.escondido.ca.us>
Date: October 7, 2014 at 8:27:09 PM PDT
To: Bill Horn <supervisorhorn@facebook.com>
Subject: Fwd: [Website Feedback]: No. County Environmental Recycling Facility (NCER)

FYI. I thought this proposed project was dead. Has not heard anything about it in well over a year. Thoughts?

Michael Morasco
Escondido City Council
District 4 Representative
<http://www.happybirthday.escondido.org/>
Sent from my iPhone

Begin forwarded message:

From: <noreply@www.escondido.org>
Date: October 7, 2014 at 4:47:54 PM PDT
To: <sabed@escondido.org>, <odiaz@escondido.org>, <egallo@escondido.org>, <mmorasco@escondido.org>, <jmasson@escondido.org>
Subject: [Website Feedback]: No. County Environmental Recycling Facility (NCER)
Reply-To: <dltowne@gmail.com>

Diana Towne
dltowne@gmail.com

Dear Council Members:

As you know, there is a proposed concrete crushing plant slated for Mesa Rock Road just north of town. This use of land is inappropriate and nonconforming and I implore you ALL to write a letter to the County stating your displeasure with this proposal. I know this is a County issue, but Escondido and many of its residents will be detrimentally affected physically and economically if this plant is allowed to be built at its current location.

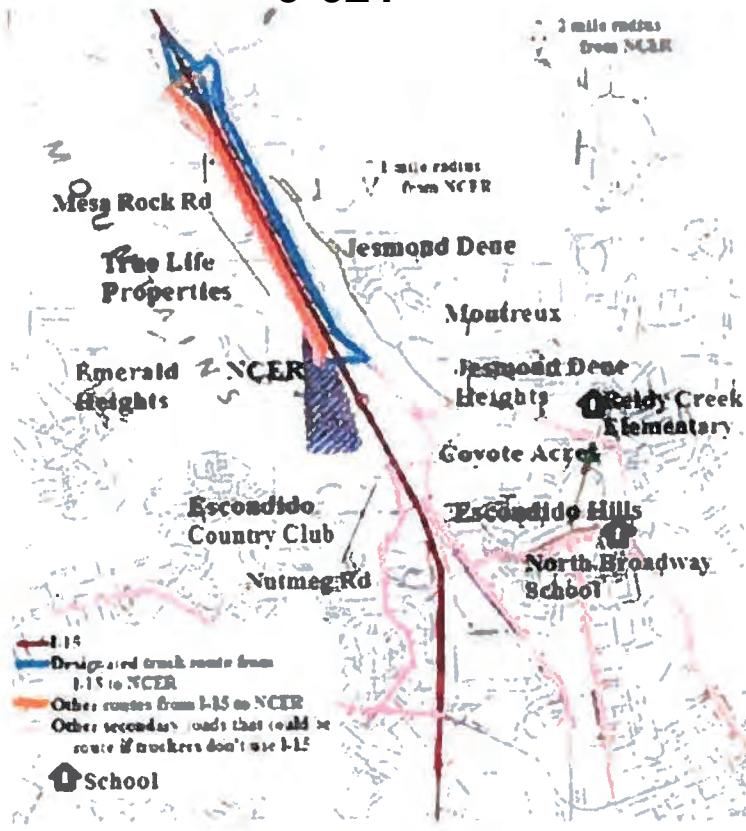
*There are homes on both sides of the freeway that will be affected by the plant.

*Belle Marie Winery and Tasting Room will be hard pressed to have outside functions on their lawn with assured dust this plant will generate.

*Reidy Creek Elementary, Jesmond Dene Park and Reidy Creek Golf Course are due east of the proposed plant. Not to mention all the homes. The prevailing winds are West to East. The plant is anticipated to produce approx. 48 tons per day of product and would be allowed to receive 174 tons per day of incoming debris. Huge truckloads of dust and rock. Makes one want to buy a home in the NW or NE corner of Escondido, doesn't it?

The Notice of Proposal (PDS 2008-3500-08-015) has been issued, the EIR process is underway. PLEASE tell the County Escondido's citizen's don't need to have this plant. Please think of the schools and the kids breathing the dust filled air.

Deadline for letters to the County is October 13 NLT 4PM. All this is within a 2 mile radius of the proposed plant. Please help, please send a letter of opposition to Beth Ehsan, Project Manager, County of San Diego at: beth.ehsan@sdcounty.ca.gov



Thank you for your time, your interest and your concern.

Sincerely,

Diana Towne



County of San Diego

MARK WARDLAW
DIRECTOR
PHONE (858) 694-2982
FAX (858) 694-2555

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
www.sdcounty.ca.gov/pds

DARREN GRETLER
ASSISTANT DIRECTOR
PHONE (858) 694-2982
FAX (858) 694-2555

**NORTH COUNTY ENVIRONMENTAL RESOURCES; PDS2008-3500-08-015
SEPTEMBER 24, 2014, COUNTY OPERATIONS CENTER
PUBLIC SCOPING MEETING COMMENT SHEET**

1. The project description provides no information on control Technologies used to abate dust, noise & other emissions. Reduction of environmental impact requires the use of "Best Available Control Technologies (BACT)"
2. The proposed 20 storage bins are assumed to be made of steel (because of lack of adequate description) and they are open at the top; then the operation of the facility will be very noisy which must be taken into account in the EIR.
3. In the County Recorder's Office Declaration of Restrictions Doc # 2005-0588207, an area in Parcel Map TPM 99-07 was designated as open space to protect & preserve the natural resources which must also be taken into EIR consideration.

Mail to:

Beth Ehsan, Project Manager
5510 ~~Rubin Road~~, ste 310
San Diego, CA 92123 Overland Ave

Email: beth.ehsan@sdcounty.ca.gov

FAX: (858) 694-3373

Phone: (858) 694-3103

Tseng Nien San 10/04/2014
Signature, Date

NIEN-SAN TSENG

Print Name

1251 Nutmeg Terrace

Address

Escondido, CA 92026

City, State, Zip Code

Ehsan, Beth

From: Joan Van Ingen <joanthe6th@gmail.com>
Sent: Monday, October 13, 2014 9:48 AM
To: Ehsan, Beth
Subject: Mesa Rock Project

Good Morning! I enjoyed talking with you all at the meeting, and felt that giving such an open forum to all the concerned citizens in our area was a step in the right direction.

My follow-up in this e-mail refers to two items. One of the speakers mentioned Arie de Jong's statement that he felt he had no responsibility re asbestos coming in for recycling. I also spoke to Arie when we went on a tour of the project. He said to me: "I don't have to worry about asbestos, it's up to the people sending the debris for recycling." Since when does a project not have any responsibility for their acceptance of whatever is being trucked in with no way to verify what's in the trucks? The County could face lawsuits if anyone becomes ill (or dies) from contamination from this project.

Arie also agreed not to allow trucks to enter Mesa Rock Road from the Deer Springs intersection. They will be required to go east from the Deer Springs/Mountain Meadow exit from I-15, then south on Old 395 to the Mesa Rock Road intersection. Then they turn west on Mesa Rock Road, pass under I-15 freeway to the entrance to the recycling project. Having lived in this area since 1981 and seen the truckers take whatever route they want - over and over - I KNOW that this assurance from Arie will not be enforceable.

One more thing. Please check the angles a truck will have to make to go under the freeway and make a turn onto the project's entry road. If more than 2 or 3 large trucks are attempting this maneuver, there could well be a backup on Old 395.

Thank You.

Joan M. Van Ingen
8975-315 Lawrence Welk Drive
Escondido, CA, , 92026

760-749-0932

Subject: North County Environmental Resources Recycling Facility

October 1, 2014,

Beth,

I have driven by the sight again and took some pictures of the curve, 15 mile per hour warning and the memorials to the three people killed there. It is such a dangerous curve and so sad to see these crosses. It is hard to get the right pictures however just driving the road tells it all.

If you would take a drive and go down N. Nutmeg Street, turn left onto N Centre City Parkway and the 1st left onto Mesa Rock Rd you will see the underpass and there are the crosses on the south side of the road. There is a 15 mile an hour sign across from the memorial.

I had mentioned what a dangerous curve this is for a regular automobile how would trucks be able to use this. There is no restriction as far as truck weight. How would a truck even get under that underpass.

The sight where they are planning on building the Recycling Facility is not far from the 3 crosses and it appears they have already started grading even though there has not been an approval from the county.

Thank you for reading this and please pass it on to the traffic section or anyone you feel should see it. Thank you for your help and patience.

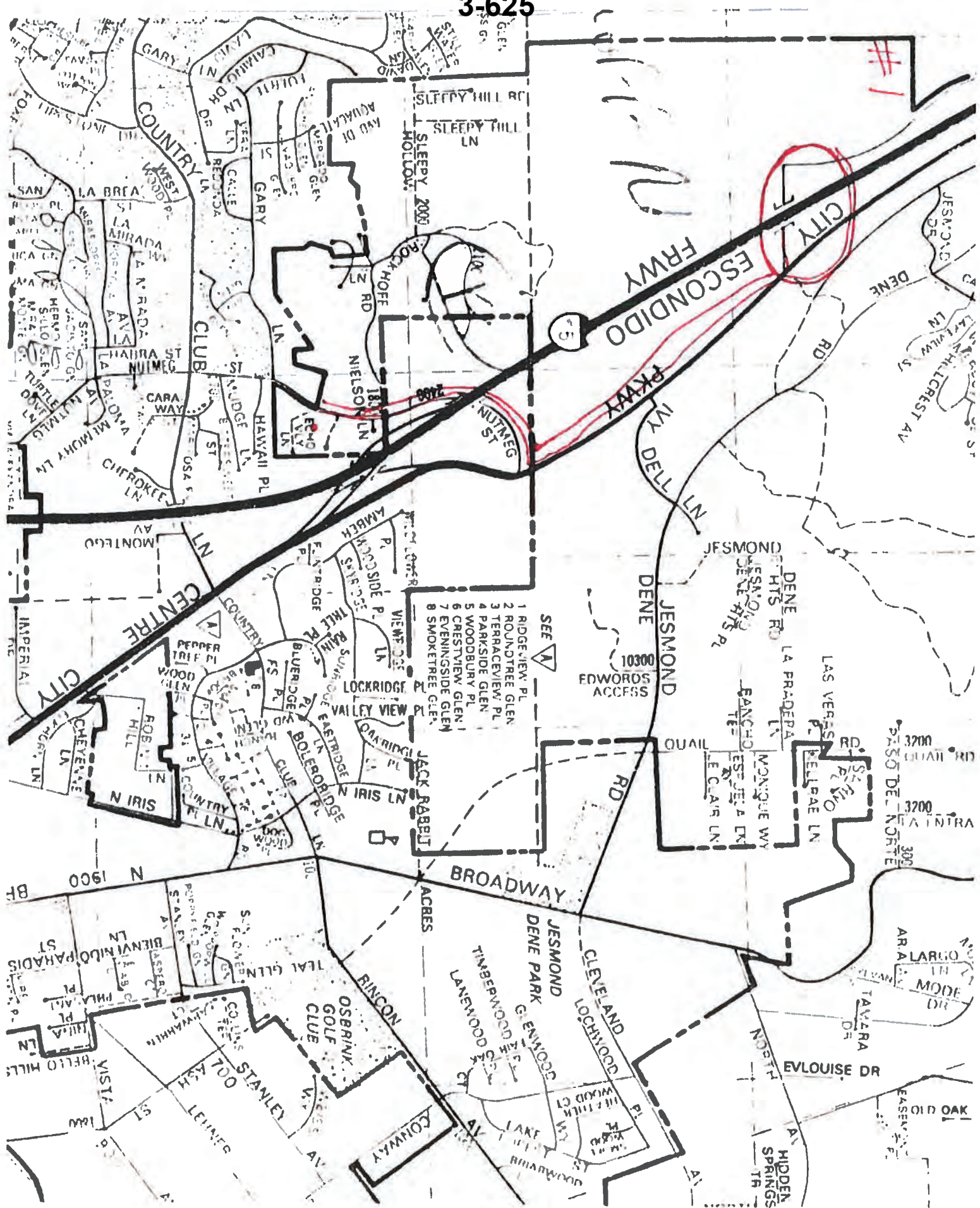
Thank you.

**Sylvia Wacknitz
2148 Rockhoff Rd.
Escondido, Ca. 92026**

The following attachments:

- 1. Map from Thomas Bros. showing location of underpass and the curve**
- 2. Pictures of the crosses where three people died on this road**
- 3. Underpass where the crosses are located on Mesa Rock Road.**
- 4. Snapshots of going west around the curve**
- 6. Aerial photos of the area**

Thursday, October 02, 2014 AOL: Kkawac



90#



#2



#3



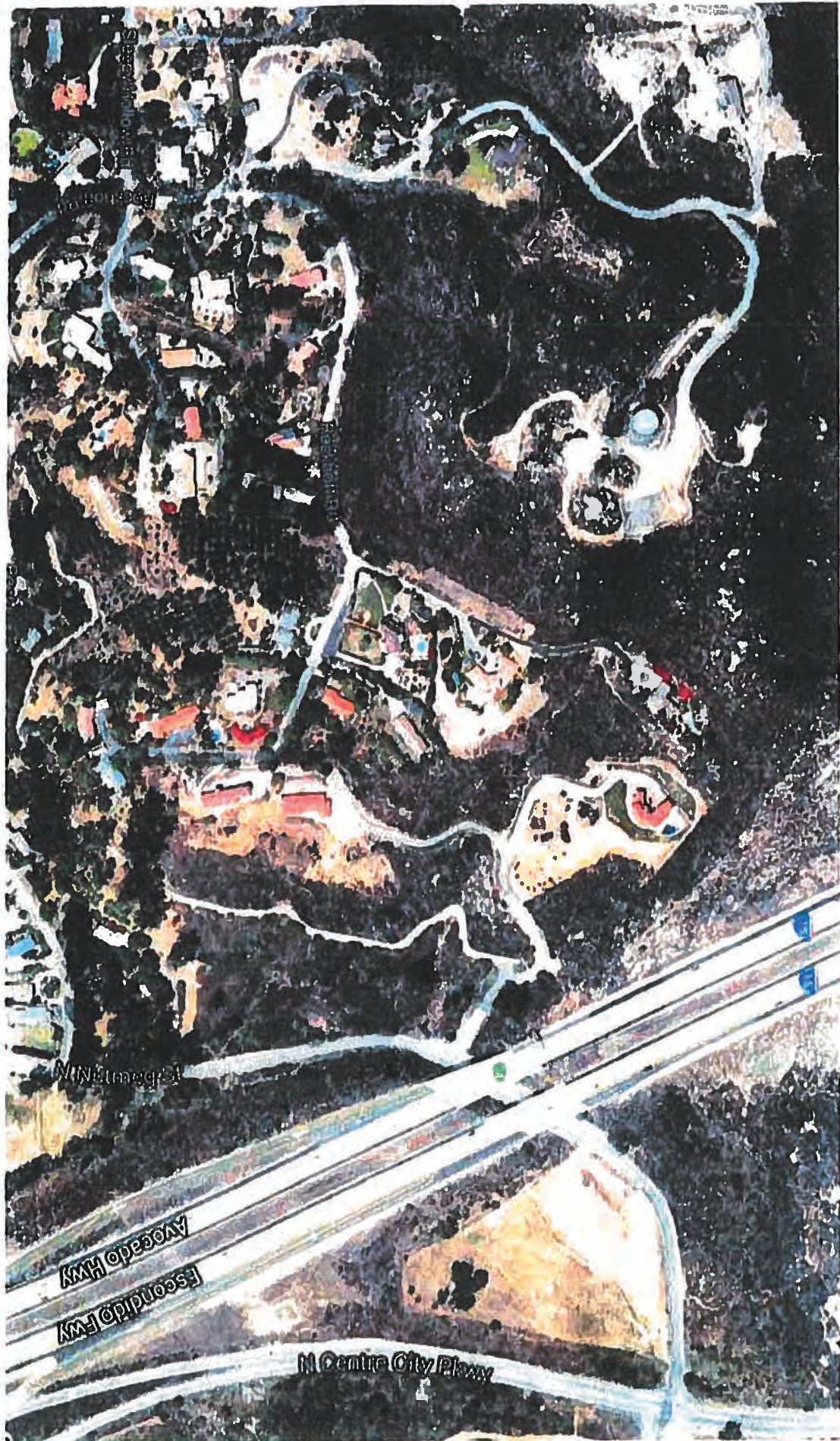
#4





#5









Ehsan, Beth

From: Bob Walker <bwalker@connxns.com>
Sent: Sunday, October 05, 2014 4:14 PM
To: Ehsan, Beth
Subject: Construction and Demolition Recycling Plant

I am writing in regards to the proposed Recycling Plant being proposed in the Jesmond Dene community. We live at 25445 Jesmond Dene Rd and we moved here 18 months ago from the La Costa area to have a nice home in a quiet country setting. We can hear the birds and roosters every morning, there are owls that fly around us and at night we can hear the quail chirping. Hearing of this plant being proposed has me very concerned about the quality of the area, noise, pollution from the trucks, increased traffic, loss of the animals as they will scatter as more big vehicles come into the area, the loss in value of our \$1m+ home, the increased dust and particles in the air from this operation, and not to mention the view of this facility will take the country setting and turn into into a cesspool.

We are strongly opposed to this plant and will fight its process in trying to get approval to built here. Stop the process please....

Thank you

Bob Walker
President
Connexions Sports & Entertainment
5927 Balfour Court #102
Carlsbad, CA 92008

760.804.1517 wk
602.432.6474 mb
760.683.3340 fx

www.connxns.com – Twitter: @bobwalker38 Instagram: @bobwalker_connxns

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Ehsan, Beth

From: Janice Welsh <jenjaxma@yahoo.com>
Sent: Monday, October 13, 2014 11:36 AM
To: Ehsan, Beth
Subject: NCER Waste Project

Good morning Beth, We would like to express our concern over the NCER Waste Project being considered. We believe the proximity to homes in the area will result in dirt and dust exposure as well as an increase in noise, which will cause home values to decline and discourage home ownership in the area. This in turn hurts our local schools and will result in good families leaving the area. Please consider an alternative site for this plan further up the I-15 corridor where there are fewer impacted residential areas. Thank you.

Janice Welsh
jenjaxma@yahoo.com
619-997-4967

Ehsan, Beth

From: Dave Wodehouse <rikoziell@cox.net>
Sent: Sunday, October 12, 2014 4:16 PM
To: Ehsan, Beth
Subject: North County Environmental Resources Recycling Facility

Dear Ms. Ehsan,

I am a resident in the neighborhood of the proposed recycling facility. I would like to join all of my neighbors in urging you to reject this proposal. Here are a few of the reasons why. It is not in accordance with our natural environment as well as endangering our fragile infrastructure. It is incompatible with our neighborhoods standard of living. It will greatly increase traffic danger, as well as the danger of a serious fire in case of a serious accident.

In short, this terrible plan will significantly decrease our quality of living and our property values. Please feel free to contact me. Thank you.

Dave Wodehouse
2138 Rockhoff Rd.
Escondido, CA 92026.

Ehsan, Beth

From: Chickeyrose@aol.com
Sent: Thursday, October 09, 2014 1:16 AM
To: Ehsan, Beth
Subject: NCER Waste Project

Dear Ms. Ehsan.

Since you are seeking input from the public, I am writing this letter to express my serious concerns regarding the negative impact that this project will have on my community in terms of noise, pollution, dust, property values, scenic views and the overall negative effect on our environment. Surely there must be a location more suitable for a business of this nature where it wouldn't negatively effect so many residents that live so close to this site. I trust that you will take my concerns into consideration when making such a far-reaching decision on this proposed project.

Sincerely,
Rosemarie Woldin

Ehsan, Beth

From: Shirley Wolff <sawolff@cox.net>
Sent: Thursday, October 09, 2014 3:26 PM
To: Ehsan, Beth
Cc: 'Vicki Broughton'
Subject: NCER Waste Project Plan

Dear Ms Ehsan:

I was unable to attend the public meeting regarding this planned project, but, wish to register my complaint against such a project so close to my home, as well, as to those of my neighbors! It will be noisy, I'm sure, but, more importantly, will be ecologically harmful to all in such close proximity to this project. I am a soon to be eighty-six year old woman, and both issues mentioned will affect my health and quality of life. I feel certain of that!!

Please add my name to the list of those opposing this plan. Thank you very much for your careful consideration.

Mrs. Shirley A. Wolff
2200 Rockhoff Road
Escondido, CA 92026-1128
(760) 746-0279

Loy, Maggie A

Subject: FW: NCER Waste Project Plan

From: Shirley Wolff [<mailto:sawolff@cox.net>]

Sent: Friday, October 10, 2014 5:18 PM

To: Ehsan, Beth

Subject: RE: NCER Waste Project Plan

Dear Ms. Ehsan:

Thank you for your acknowledgement of my note regarding the NCER Waste Project Plan. I hope that there have been enough "complainants" to make a difference in negating progress on this plan. There must be a lot of vacant land parcels that could accommodate a waste plan that would not impose hardships, both ecological and physical, upon established communities.

Mrs. Shirley Wolff

Ehsan, Beth

From: Rochelle Wood <rtwood@cox.net>
Sent: Saturday, October 04, 2014 3:54 PM
To: Ehsan, Beth
Subject: NCER Waste Project

Beth,

Our community is across from this proposed plant and we are concerned with the impact of noise, dust and debris this will blow into our neighborhood.

Also, it could be a factor in lowering our property values, but mainly a health issue for us.

We find this to be an unacceptable business in our neighborhood.

Thomas & Rochelle Wood
2976 Jesmond Dene Hgt. Road
Escondido, CA 92026

Beth Ehsan
Project Manager
County of San Diego
Planning and Development Services
5510 Overland Ave, Suite 310
San Diego CA 92123

Re. NORTH COUNTY ENVIRONMENTAL RESOURCES RECYCLING FACILITY
PDS2008-3500-08-015

October 10, 2014

Dear Ms. Ehsan and responsible PDS authorities,

As the owner of the property at 25311 Jesmond Dene Road, Escondido, I write to voice my objection to the North County Environmental Resources Recycling Center and provide comments on the Notice of Preparation for an Environmental Impact Report.

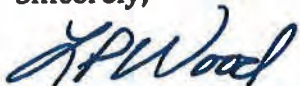
My house on the property directly overlooks the proposed site, across I-15 from the East. There are no hills or other natural obstructions to provide any substantial visual or noise protection. Note that I also own an adjoining property at 25315 Jesmond Dene Road, the subject of separate correspondence.

My family have owned and lived at this property for 50 years. It is my belief that if the project goes ahead we will be adversely affected by it in many ways. Aside from substantial impact on the value of my property, it will we believe generate very significant noise, dust, and other environmental pollution. In addition to that and the visual impact, we are greatly concerned by the proposed hours of operation 5am -7pm six days a week.

We can find no specific information in the initial documentation and project description concerning processing methods and associated protective measures for noise and dust. In addition, the discrepancy between incoming and outgoing capacities raises many questions concerning the correct scoping of the facility and the validity of any EIR based upon the project description as currently documented.

In summary, I object to the project and believe that if it were to proceed it would have very substantial negative impact on our residential amenity, health, and general wellbeing.

Sincerely,



Laurie Wood
25311 Jesmond Dene Rd
Escondido CA 92026

3-643
Document Details Report
State Clearinghouse Data Base

SCH# 2014091033
Project Title North County Environmental Resources (NCER) Recycling Facility
Lead Agency San Diego County

Type NOP Notice of Preparation
Description The project is a recycling facility for tree branches and logs; wood and construction debris; and concrete, asphalt, and inert material (CDI) from demolition projects. Only pre-sorted, non-contaminated tree waste, wood and construction debris would be accepted for processing and there would be no composting or acceptance of solid waste. NCER is anticipated to produce two truckloads per day (approximately 48 tons per day, 15,000 net tons annually) of finished product.

Lead Agency Contact

Name Beth Ehsan
Agency San Diego County
Phone 858 694 3103 **Fax**
email
Address 5510 Overland Avenue, Suite 110
City San Diego **State** CA **Zip** 92123

Project Location

County San Diego
City Escondido
Region
Cross Streets Mesa Rock Road and Deer Springs Road
Lat / Long 33° 10' 9" N / 117° 6' 44" W
Parcel No. 187-100-23, 187-100-37, 187-100-38
Township 11S **Range** 2W **Section** 32 **Base** SBB&M

Proximity to:

Highways I-15
Airports No
Railways No
Waterways No
Schools 11
Land Use High Impact Industrial (I-3), M54

Project Issues Aesthetic/Visual; Air Quality; Biological Resources; Noise; Toxic/Hazardous; Water Quality; Other Issues

Reviewing Agencies Resources Agency; Department of Parks and Recreation; Resources, Recycling and Recovery; Department of Fish and Wildlife, Region 5; Native American Heritage Commission; California Highway Patrol; Caltrans, District 11; Air Resources Board, Major Industrial Projects; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 9

Date Received 09/12/2014 **Start of Review** 09/12/2014 **End of Review** 10/13/2014



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

Notice of Preparation

September 12, 2014

To: Reviewing Agencies

Re: North County Environmental Resources (NCER) Recycling Facility
SCH# 2014091033

Attached for your review and comment is the Notice of Preparation (NOP) for the North County Environmental Resources (NCER) Recycling Facility 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:

Beth Ehsan
San Diego County
5510 Overland Avenue, Suite 110
San Diego, CA 92123

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

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

Attachments
cc: Lead Agency

Beth Ehsan
Project Manager
County of San Diego
Planning and Development Services
5510 Overland Ave, Suite 310
San Diego CA 92123

Re. NORTH COUNTY ENVIRONMENTAL RESOURCES RECYCLING FACILITY
PDS2008-3500-08-015

October 10, 2014

Dear Ms. Ehsan and responsible PDS authorities,

As the owner of the property at 25315 Jesmond Dene Road, Escondido, I write to voice my objection to the North County Environmental Resources Recycling Center and provide comments on the Notice of Preparation for an Environmental Impact Report.

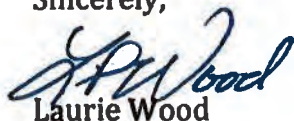
We have just completed construction of a newly remodeled home on the property. The house is located in a saddle directly overlooking the proposed site, East across I-15. From the house we have direct visual sighting of the proposed project site, with no natural obstructions to provide any substantial visual or noise protection. Further, prevailing winds are from the West up the valley, and any dust produced at the proposed facility will blow naturally toward our property. Note that I also own an adjoining property at 25311 Jesmond Dene Road, the subject of separate correspondence.

My family have lived in this location for 50 years. It is my belief that if the project goes ahead we will be adversely affected by it in many ways. Aside from substantial impact on the value of my new home, it will we believe generate very significant noise and other environmental pollution including dust as noted above. In addition to that and the visual impact, we are greatly concerned by the proposed hours of operation 5am -7pm six days a week.

As noted in the correspondence concerning my other property, we can find no specific information in the initial documentation and project description concerning processing methods and associated protective measures for noise and dust. In addition, the discrepancy between incoming and outgoing capacities raises many questions concerning the correct scoping of the facility and the validity of any EIR based upon the project description as currently documented.

In summary, I object to the project and believe that if it were to proceed it would have very substantial negative impact on our residential amenity, health, and general wellbeing.

Sincerely,



Laurie Wood
25315 Jesmond Dene Rd
Escondido CA 92026

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

SCH #

Project Title: North County Environmental Resources (NCER) Recycling Facility

Lead Agency: County of San Diego

Contact Person: Beth Ehsan

Mailing Address: 5510 Overland Avenue Suite 110

Phone: 858-694-3103

City: San Diego

Zip: 92123

County: San Diego

Project Location: County: San Diego

City/Nearest Community: Escondido

Cross Streets: Mesa Rock Road and Deer Springs Road

Zip Code: 92026

Lat. / Long.: 33° 10' 9" N/ 117° 6' 44" W

Total Acres: 139.5

Assessor's Parcel No.: 187-100-23, 187-100-31, 187-100-33,

Section: 32

Twp.: 11S

Range: 2W

Base: SBB&M

187-100-35, 187-100-37, and 187-100-38

Within 2 Miles: State Hwy #: I-15

Waterways: none

Airports: none

Railways: none

Schools: eleven

Document Type:

CEQA: ☒ NOP
☐ Early Cons
☐ Neg Dec
☐ Mit Neg Dec

☐ Draft EIR
☐ Supplement/Subsequent EIR
 (Prior SCH No.)
☐ Other

NEPA: ☐ NOI
☐ EA
☐ Draft EIS
☐ FONSI

Other: ☐ Joint Document
☐ Final Document
☐ Other

Local Action Type:

☐ General Plan Update
☐ General Plan Amendment
☐ General Plan Element
☐ Community Plan

☐ Specific Plan
☐ Master Plan
☐ Planned Unit Development
☒ Site Plan

☐ Rezone
☐ Prezone
☐ Use Permit
☐ Land Division (Subdivision, etc.)

☐ Annexation
☐ Redevelopment
☐ Coastal Permit
☒ Other BA/CC

Development Type:

☐ Residential: Units _____ Acres _____
☐ Office: Sq.ft. _____ Acres _____ Employees _____
☐ Commercial: Sq.ft. _____ Acres _____ Employees _____
☒ Industrial: Sq.ft. 12,000 Acres 35.5 Employees 18
☐ Educational
☐ Recreational

☐ Water Facilities: Type _____ MGD _____
☐ Transportation: Type _____
☐ Mining: Mineral _____
☐ Power: Type _____ MW _____
☐ Waste Treatment: Type _____ MGD _____
☐ Hazardous Waste: Type _____
☐ Other: _____

Project Issues Discussed in Document:

☒ Aesthetic/Visual
☐ Agricultural Land
☒ Air Quality
☐ Archeological/Historical
☒ Biological Resources
☐ Coastal Zone
☐ Drainage/Absorption
☐ Economic/Jobs
☒ Other Greenhouse Gas Emissions

☐ Fiscal
☐ Flood Plain/Flooding
☐ Forest Land/Fire Hazard
☐ Geologic/Seismic
☐ Minerals
☒ Noise
☐ Population/Housing Balance
☐ Public Services/Facilities

☐ Recreation/Parks
☐ Schools/Universities
☐ Septic Systems
☐ Sewer Capacity
☐ Soil Erosion/Compaction/Grading
☐ Solid Waste
☒ Toxic/Hazardous
☐ Traffic/Circulation

☐ Vegetation
☒ Water Quality
☐ Water Supply/Groundwater
☐ Wetland/Riparian
☐ Wildlife
☐ Growth Inducing
☐ Land Use
☐ Cumulative Effects

Present Land Use/Zoning/General Plan Designation:

High Impact Industrial (I-3), M54

Project Description: (please use a separate page if necessary)

The project is a recycling facility for tree branches and logs; wood and construction debris; and concrete, asphalt, and inert material (CDI) from demolition projects. Only pre-sorted, non-contaminated tree waste, wood and construction debris would be accepted for processing and there would be no composting or acceptance of solid waste. NCER is anticipated to produce two truckloads per day (approximately 48 tons per day, 15,000 net tons annually) of finished product.

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.

January 2008

NOP Distribution List

<input type="checkbox"/> <u>Resources Agency</u> <input type="checkbox"/> Resources Agency Nadell Gayou <input type="checkbox"/> Dept. of Boating & Waterways Nicole Wong <input type="checkbox"/> California Coastal Commission Elizabeth A. Fuchs <input type="checkbox"/> Colorado River Board Lisa Johansen <input type="checkbox"/> Dept. of Conservation Elizabeth Carpenter <input type="checkbox"/> California Energy Commission Eric Knight <input type="checkbox"/> Cal Fire Dan Foster <input type="checkbox"/> Central Valley Flood Protection Board James Herola <input type="checkbox"/> Office of Historic Preservation Ron Parsons <input type="checkbox"/> Dept of Parks & Recreation Environmental Stewardship Section <input type="checkbox"/> California Department of Resources, Recycling & Recovery Sue O'Leary <input type="checkbox"/> S.F. Bay Conservation & Dev't. Comm. Steve McAdam <input type="checkbox"/> Dept. of Water Resources Agency Nadell Gayou	<input type="checkbox"/> Fish & Wildlife Region 1E Laurie Harnsberger <input type="checkbox"/> Fish & Wildlife Region 2 Jeff Drongesen <input type="checkbox"/> Fish & Wildlife Region 3 Charles Armor <input type="checkbox"/> Fish & Wildlife Region 4 Julie Vance <input checked="" type="checkbox"/> Fish & Wildlife Region 5 Leslie Newton-Reed Habitat Conservation Program <input type="checkbox"/> Fish & Wildlife Region 6 Tiffany Ellis Habitat Conservation Program <input type="checkbox"/> Fish & Wildlife Region 6 I/M Heidi Sickler Inyo/Mono, Habitat Conservation Program <input type="checkbox"/> Dept. of Fish & Wildlife M George Isaac Marine Region	<input type="checkbox"/> Native American Heritage Comm. Debbie Treadway <input type="checkbox"/> Public Utilities Commission Leo Wong <input type="checkbox"/> Santa Monica Bay Restoration Guangyu Wang <input type="checkbox"/> State Lands Commission Jennifer Deleong <input type="checkbox"/> Tahoe Regional Planning Agency (TRPA) Cherry Jacques	<input type="checkbox"/> Caltrans, District 8 Dan Kopulsky <input type="checkbox"/> Caltrans, District 9 Gayle Rosander <input type="checkbox"/> Caltrans, District 10 Tom Dumas <input checked="" type="checkbox"/> Caltrans, District 11 Jacob Armstrong <input type="checkbox"/> Caltrans, District 12 Maureen El Harake	<input type="checkbox"/> Regional Water Quality Control Board (RWQCB) <input type="checkbox"/> RWQCB 1 Cathleen Hudson North Coast Region (1) <input type="checkbox"/> RWQCB 2 Environmental Document Coordinator San Francisco Bay Region (2) <input type="checkbox"/> RWQCB 3 Central Coast Region (3) <input type="checkbox"/> RWQCB 4 Teresa Rodgers Los Angeles Region (4) <input type="checkbox"/> RWQCB 5S Central Valley Region (5) <input type="checkbox"/> RWQCB 5F Central Valley Region (5) Fresno Branch Office <input type="checkbox"/> RWQCB 5R Central Valley Region (5) Redding Branch Office <input type="checkbox"/> RWQCB 6 Lahontan Region (6) <input type="checkbox"/> RWQCB 6V Lahontan Region (6) Victorville Branch Office <input type="checkbox"/> RWQCB 7 Colorado River Basin Region (7) <input type="checkbox"/> RWQCB 8 Santa Ana Region (8) <input checked="" type="checkbox"/> RWQCB 9 San Diego Region (9)
<input type="checkbox"/> <u>Business, Trans & Housing</u> <input type="checkbox"/> Caltrans - Division of Aeronautics Philip Crimmins <input type="checkbox"/> Caltrans - Planning Terri Pencovic <input checked="" type="checkbox"/> California Highway Patrol Suzann Ikeuchi Office of Special Projects <input type="checkbox"/> Housing & Community Development CEQA Coordinator Housing Policy Division	<input type="checkbox"/> Air Resources Board All Other Projects Cathi Slaminski <input type="checkbox"/> Transportation Projects Nesamani Kalandiyur <input checked="" type="checkbox"/> Industrial Projects Mike Tollstrup <input type="checkbox"/> State Water Resources Control Board Regional Programs Unit Division of Financial Assistance <input type="checkbox"/> State Water Resources Control Board Jeffery Werth Division of Drinking Water <input type="checkbox"/> State Water Resources Control Board Student Intern, 401 Water Quality Certification Unit Division of Water Quality <input type="checkbox"/> State Water Resources Control Board Phil Crader Division of Water Rights <input checked="" type="checkbox"/> Dept. of Toxic Substances Control CEQA Tracking Center <input type="checkbox"/> Department of Pesticide Regulation CEQA Coordinator	<input type="checkbox"/> Caltrans, District 1 Rex Jackman <input type="checkbox"/> Caltrans, District 2 Marcelino Gonzalez <input type="checkbox"/> Caltrans, District 3 Eric Federicks - South Susan Zanchi - North <input type="checkbox"/> Caltrans, District 4 Erik Alm <input type="checkbox"/> Caltrans, District 5 David Murray <input type="checkbox"/> Caltrans, District 6 Michael Navarro <input type="checkbox"/> Caltrans, District 7 Dianne Madson	<input type="checkbox"/> Caltrans, District 8 Dan Kopulsky <input type="checkbox"/> Caltrans, District 9 Gayle Rosander <input type="checkbox"/> Caltrans, District 10 Tom Dumas <input checked="" type="checkbox"/> Caltrans, District 11 Jacob Armstrong <input type="checkbox"/> Caltrans, District 12 Maureen El Harake	<input type="checkbox"/> Regional Water Quality Control Board (RWQCB) <input type="checkbox"/> RWQCB 1 Cathleen Hudson North Coast Region (1) <input type="checkbox"/> RWQCB 2 Environmental Document Coordinator San Francisco Bay Region (2) <input type="checkbox"/> RWQCB 3 Central Coast Region (3) <input type="checkbox"/> RWQCB 4 Teresa Rodgers Los Angeles Region (4) <input type="checkbox"/> RWQCB 5S Central Valley Region (5) <input type="checkbox"/> RWQCB 5F Central Valley Region (5) Fresno Branch Office <input type="checkbox"/> RWQCB 5R Central Valley Region (5) Redding Branch Office <input type="checkbox"/> RWQCB 6 Lahontan Region (6) <input type="checkbox"/> RWQCB 6V Lahontan Region (6) Victorville Branch Office <input type="checkbox"/> RWQCB 7 Colorado River Basin Region (7) <input type="checkbox"/> RWQCB 8 Santa Ana Region (8) <input checked="" type="checkbox"/> RWQCB 9 San Diego Region (9)
<input type="checkbox"/> <u>Other Departments</u> <input type="checkbox"/> Food & Agriculture Sandra Schubert Dept. of Food and Agriculture <input type="checkbox"/> Dept. of General Services Public School Construction <input type="checkbox"/> Dept. of General Services Anna Garbeff Environmental Services Section <input type="checkbox"/> Delta Stewardship Council Kevan Samsam	<input type="checkbox"/> Dept. of Fish & Wildlife Commissioners, Boards <input type="checkbox"/> Delta Protection Commission Michael Machado <input type="checkbox"/> OES (Office of Emergency Services)	<input type="checkbox"/> Dept. of Fish & Wildlife Scott Flint Environmental Services Division <input type="checkbox"/> Fish & Wildlife Region 1 Donald Koch	<input type="checkbox"/> Caltrans, District 8 Dan Kopulsky <input type="checkbox"/> Caltrans, District 9 Gayle Rosander <input type="checkbox"/> Caltrans, District 10 Tom Dumas <input checked="" type="checkbox"/> Caltrans, District 11 Jacob Armstrong <input type="checkbox"/> Caltrans, District 12 Maureen El Harake	<input type="checkbox"/> Regional Water Quality Control Board (RWQCB) <input type="checkbox"/> RWQCB 1 Cathleen Hudson North Coast Region (1) <input type="checkbox"/> RWQCB 2 Environmental Document Coordinator San Francisco Bay Region (2) <input type="checkbox"/> RWQCB 3 Central Coast Region (3) <input type="checkbox"/> RWQCB 4 Teresa Rodgers Los Angeles Region (4) <input type="checkbox"/> RWQCB 5S Central Valley Region (5) <input type="checkbox"/> RWQCB 5F Central Valley Region (5) Fresno Branch Office <input type="checkbox"/> RWQCB 5R Central Valley Region (5) Redding Branch Office <input type="checkbox"/> RWQCB 6 Lahontan Region (6) <input type="checkbox"/> RWQCB 6V Lahontan Region (6) Victorville Branch Office <input type="checkbox"/> RWQCB 7 Colorado River Basin Region (7) <input type="checkbox"/> RWQCB 8 Santa Ana Region (8) <input checked="" type="checkbox"/> RWQCB 9 San Diego Region (9)

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Blvd., Suite 100
West SACRAMENTO, CA 95691
(916) 373-3710
Fax (916) 373-5471



September 25, 2014

Beth Ehsan
San Diego County
5510 Overland Avenue, Suite 110
San Diego, CA 92123

RE: SCH# 2014091033 North County Environmental Resources (NCER) Recycling Facility, San Diego County. .

Dear Ms. Ehsan,

The Native American Heritage Commission (NAHC) has reviewed the Notice of Preparation (NOP) referenced above. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines 15064.5(b)). To comply with this provision the lead agency is required to assess whether the project will have an adverse impact on historical resources within the area of project effect (APE), and if so to mitigate that effect. To adequately assess and mitigate project-related impacts to archaeological resources, the NAHC recommends the following actions:

- ✓ Contact the appropriate regional archaeological Information Center for a record search. The record search will determine:
 - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- ✓ Contact the Native American Heritage Commission for:
 - A Sacred Lands File Check. **SFL Check Completed with Negative Results**
 - A list of appropriate Native American contacts for consultation concerning the project site and to assist in the mitigation measures. **Native American Contacts List attached**
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
 - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) Guidelines §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
 - Lead agencies should include in their mitigation plan provisions for the disposition of recovered cultural items that are not burial associated, which are addressed in Public Resources Code (PRC) §5097.98, in consultation with culturally affiliated Native Americans.
 - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, PRC §5097.98, and CEQA Guidelines §15064.5(e), address the process to be followed in the event of an accidental discovery of any human remains and associated grave goods in a location other than a dedicated cemetery.

Sincerely,

Katy Sanchez

Katy Sanchez
Associate Government Program Analyst

CC: State Clearinghouse

3-649
Native American Contacts
San Diego County
September 25, 2014

Ewiiapaayp Tribal Office
Robert Pinto Sr., Chairperson
4054 Willows Road Diegueno/Kumeyaay
Alpine, CA 91901
wmicklin@leaningrock.net
(619) 445-6315
(619) 445-9126 Fax

Viejas Band of Kumeyaay Indians
Anthony R. Pico, Chairperson
P.O. Box 908 Diegueno/Kumeyaay
Alpine, CA 91903
jhagen@viejas-nsn.gov
(619) 445-3810
(619) 445-5337 Fax

La Posta Band of Mission Indians
Gwendolyn Parada, Chairperson
8 Crestwood Road Diegueno/Kumeyaay
Boulevard, CA 91905
gparada@lapostacasino.
(619) 478-2113
(619) 478-2125

Kumeyaay Cultural Historic Committee
Ron Christman
56 Viejas Grade Road Diegueno/Kumeyaay
Alpine, CA 92001
(619) 445-0385

Manzanita Band of Kumeyaay Nation
Leroy J. Elliott, Chairperson
P.O. Box 1302 Diegueno/Kumeyaay
Boulevard, CA 91905
ljbirdsinger@aol.com
(619) 766-4930
(619) 766-4957 Fax

Campo Band of Mission Indians
Ralph Goff, Chairperson
36190 Church Road, Suite 1 Diegueno/Kumeyaay
Campo, CA 91906
chairgoff@aol.com
(619) 478-9046
(619) 478-5818 Fax

Sycuan Band of the Kumeyaay Nation
Daniel Tucker, Chairperson
5459 Sycuan Road Diegueno/Kumeyaay
El Cajon, CA 92019
ssilva@sycuan-nsn.gov
(619) 445-2613
(619) 445-1927 Fax

Jamul Indian Village
Raymond Hunter, Chairperson
P.O. Box 612 Diegueno/Kumeyaay
Jamul, CA 91935
jamulrez@sctdv.net
(619) 669-4785

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH # 2014091033 North County Environmental Resources (NCER) Recycling Facility, San Diego County.

3-650
Native American Contacts
San Diego County
September 25, 2014

Kumeyaay Cultural Repatriation Committee
Steve Banegas, Spokesperson
1095 Barona Road Diegueno/Kumeyaay
Lakeside, CA 92040
sbenegas50@gmail.com
(619) 742-5587
(619) 443-0681 Fax

lipay Nation of Santa Ysabel
Clint Linton, Director of Cultural Resources
P.O. Box 507 Diegueno/Kumeyaay
Santa Ysabel, CA 92070
cjlinton73@aol.com
(760) 803-5694

Viejas Band of Kumeyaay Indians
ATTN: Julie Hagen, Cultural Resources
P.O. Box 908 Diegueno/Kumeyaay
Alpine, CA 91903
jhagen@viejas-nsn.gov
(619) 445-3810
(619) 445-5337

Sycuan Band of the Kumeyaay Nation
Sydney Morris, Environmental Coordinator
5459 Sycuan Road Diegueno/Kumeyaay
El Cajon, CA 92019
smorris@sycuan-nsn.gov
(619) 445-2613
(619) 445-1927 Fax

Ewiiapaay Tribal Office
Will Micklin, Executive Director
4054 Willows Road Diegueno/Kumeyaay
Alpine, CA 91901
wmicklin@leaningrock.net
(619) 445-6315
(619) 445-9126 Fax

Manzanita Band of the Kumeyaay Nation
Nick Elliott, Cultural Resources Coordinator
P.O. Box 1302 Kumeyaay
Boulevard, CA 91905
nickmepa@yahoo.com
(619) 766-4930
(619) 925-0952 Cell
(919) 766-4957 Fax

Manzanita Band of Mission Indians
ATTN: Keith Adkins, EPA Director
P.O. Box 1302 Kumeyaay
Boulevard, CA 91905
(619) 766-4930
(619) 766-4957 Fax

Kumeyaay Diegueno Land Conservancy
Mr. Kim Bactad, Executive Director
2 Kwaaypaay Court Diegueno/Kumeyaay
El Cajon, CA 91919
kimbactad@gmail.com
(619) 659-1008 Office
(619) 445-0238 Fax

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3-651
Native American Contacts
San Diego County
September 25, 2014

Inter-Tribal Cultural Resource Protection Council
Frank Brown, Coordinator
240 Brown Road Diegueno/Kumeyaay
Alpine, CA 91901
frbrown@viejas-nsn.gov
(619) 884-6437

Kumeyaay Cultural Repatriation Committee
Bernice Paipa, Vice Spokesperson
P.O. 937 Diegueno/Kumeyaay
Boulevard, CA 91905
bernicepaipa@gmail.com

lipay Nation of Santa Ysabel
Virgil Perez, Chairperson
P.O. Box 130 Diegueno/Kumeyaay
Santa Ysabel, CA 92070
(760) 765-0845
(760) 765-0320 Fax

This list is current only as of the date of this document.

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DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • WWW.CALRECYCLE.CA.GOV • (916) 322-4027

P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812

October 13, 2014

E-mail: Beth.Ehsan@sdcounty.ca.gov

Beth Ehsan, Project Manager
County of San Diego, Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123-1239

Subject: SCH No. 2014091033 - Notice of Preparation of a Draft Environmental Impact Report and Notice of Completion of an Initial Study for North County Environmental Resources (NCER) Recycling Facility, San Diego County

Dear Ms. Ehsan:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments for this proposed project; and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

The San Diego County Planning and Development Services Department, acting as Lead Agency, has prepared and circulated a Notice of Preparation for a Draft Environmental Impact Report (EIR) in order to comply with CEQA, and to provide information to, and solicit consultation with Responsible Agencies in the approval of the proposed project.

Project Description

The project is a recycling facility for tree waste chipping and grinding; the recycling of wood and construction debris ("C&D wood"); and the recycling of concrete, asphalt, and inert material from demolition projects ("CDI debris"). Only pre-sorted, non-contaminated tree trimmings, wood and construction debris would be accepted for processing and there would be no composting or acceptance of solid waste.

The proposed NCER facility would likely require permits for both a Medium Volume CDI facility, regulated by CCR Title 14, Division 7, Chapter 3.0, Article 5.9 Section 17383.5, and a Compostable Material Chipping and Grinding permit.

NCER is anticipated to produce two truckloads per day (approximately 48 tons per day, 15,000 net tons annually) of finished product. The daily maximum combined process tonnage of C&D wood debris and/or CDI debris allowed by the Local Enforcement Agency (LEA) is 174 tons.

The proposed project consists of a 12,000-square foot steel building, 100,000 gallon water tank, a security trailer, truck scales, and up to twenty (60 feet by 60 feet by 18 feet high) adjustable storage containers.

The facility would operate six days a week, Monday through Saturday, from 5:00 AM to 7:00 PM. The project is located at 25568 Mesa Rock Road in the North County Metropolitan Subregional Plan Area (Twin Oaks Sponsor Group Area) within the unincorporated area of San Diego County. The project site



encompasses six commonly owned separate parcels of real property identified as San Diego County Assessor Parcel Numbers (APNs) 187-100-23, 187-100-31, 187-100-33, 187-100-35, 187-100-37, and 187-100-38.

Solid waste permits are required by the County Local Enforcement Agency (LEA) in conformance with state and county regulations. A Site Plan is required in conformance with the County Zoning Ordinance and a Habitat Loss Permit is required in conformance with the Natural Communities Conservation Planning Act.

The project also includes a Boundary Adjustment between APNs 187-100-35 and 187-100-37 to provide a buffer to residential property. Combined, the project site totals 139.5 gross acres (135.6 net acres). The proposed NCER Recycling Facility would be constructed on a 35.5 acre parcel in the southeast corner of the site.

Regional access is provided by I-15 to the Deer Springs Road exit and local access to the site is provided by a private easement road via Mesa Rock Road. Fire protection services would be provided by the Deer Springs Fire Protection District, potable water would be provided by the Vallecitos Water District, and an onsite septic system is proposed.

Comments

Project Description

The project description states that there would be no composting or acceptance of solid waste. Please note that the definition of solid waste means all putrescible and nonputrescible solid, semisolid, and liquid wastes, including garbage, trash, refuse, paper, rubbish, ashes, industrial waste, demolition and construction wastes, etc, pursuant to Public Resources Code Section 40191.

The project description includes a tree waste chipping and grinding activity, but no details on this part of the project are provided. Additional information on the tree waste chipping and grinding activity should be provided in the project description and potential impacts analyzed in the EIR (e.g., types of waste (only tree waste or other green materials as defined in Title 14, California Code of Regulations (CCR), Section 17852(a)(21)), days and hours of operation, equipment, peak daily tonnage, total capacity, storage, etc.).

Days and Hours of Operation

In the EIR, be clear as to what the hours of operation are for specific activities such as the receipt of material, transferring of material, processing of material, removal of material, and site maintenance. Be specific regarding what tasks may be performed during those hours, especially the difference between office hours open to the public and operational hours closed to the public. When considering a proposed permit, CalRecycle looks for specific limitations to hours/days of operations associated with the various functions.

Boundaries between CDI Recycling and Chip and Grind Operations

For purposes of inspection and enforcement, how will the sites (tree waste chipping and grinding and C&D wood/CDI debris) be clearly separated into discrete operational units? No physical boundary is shown. Will the site be permitted separately and have mutually exclusive permit requirements or all solid waste handling activities under one permit? There are issues associated with multiple solid waste permits being issued to the same site and address, and the topics should be explored in the EIR to determine if any of the issues have environmental impacts, cumulative impacts, or are of concern for enforcing mitigation measures. See Permits comment below.

Storage Timelines and Tonnages

The EIR should identify the storage timelines for different material types and in the different stages of processing (incoming feedstock, processing material, and finished products) that will be stored on site. The EIR should discuss the environmental impacts associated with the materials if they are allowed to sit longer than the regulations and permit conditions allow, such as fire danger, vector and odor nuisances. According to site drawings, piles may be located outdoors in non-specific configurations within the boundaries of the yard, and that processed material may be put in a variety of container types or directly on the slab/ground. The assumptions, methods, and calculations in determining the total design capacity of the facility should be described in the EIR. Specifications in the design and operation of all of the solid waste handling activities should be described and the facility(ies) can address the potential environmental impacts, or mitigation measures can be developed if necessary.

Waste Streams

The EIR should indicate the types of waste to be accepted as well as those types of waste to be prohibited/excluded. Also, note that for the facility(ies) to be considered a recycler rather than a transfer/processing facility, it must meet the three part test as provided in 14 CCR, section 17402.5:

1. Incoming material has less than 10% residual solid waste;
2. Incoming material has less than 1% putrescible waste; and
3. Incoming material has been source separated before entering the facility.

Communications On-Site

Due to the site location in proximity to canyon geological features, there may be concerns about verbal communication. Take care to develop a system that is the most effective mode of communication and that meets state minimum standards.

Permits

The San Diego County Department of Environmental Health (as the Local Enforcement Agency or LEA) and CalRecycle are responsible for providing regulatory oversight of solid waste handling activities, including permitting and inspections. The permitting and regulatory requirements for compostable material chipping and grinding, and construction demolition and inert debris handling are contained in Titles 14 and Title 27 CCR. The LEA contact for this proposed project is KariLyn Merlos, and can be reached at 858-495-5799 or by e-mail at KariLyn.Merlos@sdcounty.ca.gov. The project proponent should work closely with the LEA during the permitting process for the proposed project, and both the LEA and CalRecycle may have further comments after analyzing the EIR.

Guidance to assist the lead agency in preparation of CEQA documentation for a composting facility and transfer station (similar for a CDI debris facility) are available on CalRecycle's web page at:

<http://www.calrecycle.ca.gov/SWFacilities/Permitting/CEQA/Documents/Guidance/Compost.htm>

<http://www.calrecycle.ca.gov/SWFacilities/Permitting/CEQA/Documents/Guidance/Transfer.htm>

Conclusion

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on this environmental document and hopes that this comment letter will be useful to the Lead Agency in carrying out their responsibilities in the CEQA process.

October 13, 2014

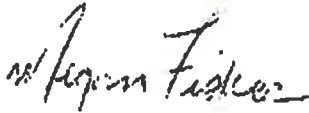
CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices, and any Notices of Determination for this project. Refer to 14 CCR, Section 15094(d) that states in part:

If the project requires discretionary approval from any state agency, the local lead agency shall also, within five working days of this approval, file a copy of the notice of determination with the Office of Planning and Research [State Clearinghouse].

If the environmental document is adopted during a public hearing, CalRecycle staff requests ten days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests ten days advance notification of the date of the adoption and project approval by the decision-making body.

If you have any questions regarding these comments, please contact me at 951.782.4176 or by e-mail at megan.fisher@calrecycle.ca.gov.

Sincerely,



Megan Fisher, Environmental Scientist
Integrated Waste Management Specialist
Permitting and Assistance Branch
Waste Permitting, Compliance and Mitigation Division
California Department of Resources Recycling and Recovery

cc: Office of Planning and Research,
State Clearinghouse

Virginia Rosales, CalRecycle
Virginia.rosales@calrecycle.ca.gov

KariLyn Merlos, San Diego County
Department of Environmental Health
KariLyn.Merlos@sdcounty.ca.gov



201 Vallecitos de Oro • San Marcos, California • 92069-1453 Telephone (760) 744-0460

October 9, 2014

County of San Diego – Attn: Planning & Development Services
5510 Overland Avenue, Suite # 310, San Diego, CA 92123

RE: Case #: PDS2008-3500-08-015, PDS2013-BC-13-0019
Log #: PDS2008-3910-08-08-012
APN's 187-100-23, 31, 33, 35, 37 and 38
North County Environmental Resources Recycling Facility (NCER)

General

The above referenced project is within the boundaries of the Vallecitos Water District and is eligible for service. Service will be provided under the rules and regulations of the District, under normal operating conditions after all required fees have been paid and all conditions of the District have been satisfied.

The project, as submitted, proposes a recycling facility for tree waste chipping and grinding; the recycling of wood and construction debris; and the recycling of concrete, asphalt, and inert material from demolition projects. The current land use is considered Rural Residential (.125-1.0 du/ac) for parcels 187-100-37 & 38 and Hillside Residential (.05-.25 du/ac) for parcels 187-100-23, 33 & 35 in the District's 2008 Master Plan. Parcel 187-100-31 is considered Open Space/Vacant. The proposed land use is Light Industrial which is considered a change in density for this area. A water and sewer study will be required to assess the impacts of the development and provide any necessary mitigation measures which will be required prior to District approval of the project.

Any existing District pipelines located within the boundaries of the project that are in conflict with the proposed development will require relocation within the public right-of-way or District easements. District policy requires that all newly created parcels have frontage on the District main and extensions of facilities to serve each newly created parcel will be required. The exact location of the main line extensions and relocation will be determined during the design phase of the project.

Water or Sewer facilities not within the public right-of-way will require a minimum 20-foot easement granted to the District. The District may require additional easements through the project or private properties for future extensions. The owner of the project is responsible for obtaining any easements including expenses incurred. Joint use of these easements is not allowed by the District and easements for storm drain and other facilities

Case #: PDS2008-3500-08-015, PDS2013-BC-13-0019

October 9, 2014

Page 2

should be analyzed early so that adequate sizing of easements for all facilities and various agencies is provided.

No structures will be allowed over District facilities. This includes but is not limited to, walls, entrance medians, landscaping, gates, guard house structures, curbs and gutters, or driveways that will be constructed over District facilities.

Water Service

The property is located within a pressure zone (source of water for fire protection and domestic use) which maintains a hydraulic gradeline (HGL) of 1,235 feet above sea level (msl). For protection of District facilities, any areas with water pressures near or higher than 150 psi will require water pressure regulators before the meter.

The proposed project includes six parcels. Four of the six parcels have frontage on a District main. There is an existing 1½ -inch water meter that currently serves parcel 187-100-23. The service line is connected to an 8-inch ACP (asbestos cement pipe) located on Mesa Rock Rd. District policy requires that a parcel of land shall have frontage on a District main prior to service being available. District water facilities are currently not fronting parcels 187-100-35 and 187-100-37. The distance to parcel 187-100-37 from the existing main is approximately 1280 LF. The distance to parcel 187-100-35 from the existing main is approximately 610 LF. The main line would need to be extended in order to service either of these parcels. Additionally, it should be noted that customers within the 1235 zone are currently being charged pumping fees and is anticipated that these fees will increase due to rising utility costs.

The project will not require a Water Supply Assessment (WSA).

Fire Flow Requirements

The Fire Department should be contacted to verify fire flow requirements and location of fire flow facilities required for the proposed project. A hydraulic analysis prepared by the District will be required to determine the available fire flow for the project. The owner/developer is responsible for all costs incurred in obtaining the hydraulic analysis. Looping or upgrades to the existing facilities both onsite and offsite may be required based on results of the Fire Flow Analysis. It is recommended that the hydraulic analysis be completed early in the process so not to cause any delay in the design and plan check process.

Sewer Service

The property is not within the District sewer service area. Sewer service will only be provided under the rules and regulations of the District, under normal operating conditions

Case #: PDS2008-3500-08-015, PDS2013-BC-13-0019

October 9, 2014

Page 3

and after all required fees have been paid and all conditions of the District have been satisfied. The annexation of the proposed project into the District's sewer service area would be required.

There are no existing District sewer facilities currently available on the frontage of the six parcels in the proposed project. The closest existing facilities are located in Rock View Glen at a distance of approximately 4,500 LF. Contact the San Diego County Department of Environmental Health Services for information regarding private septic systems.

Conclusion

All pipe clearances and crossings must adhere to the standard utility rules per the State of California, County of San Diego - Department of Environmental Health.

The District adopted Ordinance No. 162 on May 6, 2009. Ordinance No. 162 identifies various water conservation measures as they relate to current and future drought conditions including the curtailment of availability letters and limiting new service connections at level 3. The Vallecitos Water District has currently declared drought level 2.

This letter is issued for planning purposes only, and is not a representation, expressed or implied that the District will provide service at a future date. The Vallecitos Water District relies one hundred percent on imported water supplies. Water may not be available at the time the project is built. Commitments to provide service are made by the District Board of Directors and are subject to compliance with District fees, charges, rules and regulations.

Sincerely,



VALLECITOS WATER DISTRICT

Ingrid Stichter

Engineering Technician II

cc: Ken Gerdes, Director of Engineering and Operations
James Gumpel, District Engineer
Rob Scholl, Sr. Engineer Development Services



TWIN OAKS VALLEY COMMUNITY SPONSOR GROUP

P.O. Box 455

San Marcos, Ca. 92079

October 9, 2014

Maggie Loy
County of San Diego
Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

**RE: North County Environmental Resources PDS2008-3500-080-015; PDS2013-BC-13-0019; PDS2008-3910-08-08-012
NOP Comments**

Dear Maggie Loy,

The Twin Oaks Valley Community Sponsor Group would like to thank you for the opportunity to comment on this Notice of Preparation. As the County is aware, there has been a lot of Community involvement with this project and our Group has been following this project from its beginnings. We ask that the EIR for the North County Environmental Resources (NCER) consider the following:

1. During the General Plan update the Twin Oaks Valley Community Sponsor Group was opposed to the rezone of this site to High Intensity Industrial because the site is close to residential uses and is in an aesthetically important area along the I-15 corridor. We felt the change to High Impact Industrial was a Spot Zoning as defined by *"The granting to a particular parcel of land a classification concerning its use that differs from the classification of other land in the immediate area."* We were concerned because it appeared to be an *arbitrary, capricious, and unreasonable treatment of a limited area for the benefit of a single property owner.*
2. We ask that the EIR address the impacts of the zoning change and to provide clear legal justification for the zoning change so the public can be assured the zoning, which allows for this project, is appropriate, and the change to High Impact Industrial was done legally.
3. The EIR should evaluate at least three project alternatives that consider placing the project in existing industrial parks where these activities are allowed. Escondido, Vista and San Marcos have industrial parks zoned for the use that is being proposed

on this site. These industrial parks have been designed to accommodate the traffic, odors, noise, waste water treatment and other issues that will occur from this type of activity. In addition, due to the economic problems of the last six years, some of these parks have many large vacant buildings.

Air Quality:

- a. The EIR needs to study impacts from activities being planned for the site as well as cumulative impacts, both off site and on site of vehicular traffic that will be used to run the industrial operations. Activities such as rock crushing and unloading of material may have significant negative impact on residents. In addition, the large trucks being used to transport material to and from the site will add pollutants both from diesel exhaust and from the material being transported.
- b. Also, wind currents in the area may spread pollutants far beyond the site, negatively impacting nearby residents. The EIR should include a wind and microclimate study to look at how air borne particles from the site and from trucks being used for the operation, could impact adjacent residential properties.
- c. Many of the people who live near the site, such as those living in the Deer Springs Mobile Home Park, are elderly and likely have respiratory health issues that will be exacerbated by the airborne pollutants created by this project. The EIR should provide data identifying the different pollutants from the project, list how it may impact nearby residents and other businesses, and provide adequate mitigation to eliminate project impacts.
- d. Finally, the EIR should define what methods will be use to ensure mitigation measures are being followed. The community is experiencing problems with uncovered loads, dust, noise and speeding from trucks traveling to and from the quarry located on North Twin Oaks Valley Road. No enforcement measures are being used by the County. The public needs to be assured that there is sufficient mitigation and enforcement measures in place for the NCER project to prevent problems the community now experiences from the quarry, which is another form of high-impact industrial activity. The EIR needs to identify who will enforce these measures and prove they can do so. The EIR should study the use of a bond or other financial mechanism to pay for independent enforcement.

Will the trucks be covered when they are arriving and leaving the site? (legally they are supposed to but we need the EIR to tell us how it will be enforced).

Noise:

- a. The Twin Oaks Valley Community Sponsor Group is very concerned with the hours of operation, and why they are so long? They are from 5 am to 7 pm Monday thru Saturday. Since most business start at 7 am and close around 4:00 or 5:00 pm and the truck scales do not even open until 7 am, we are concerned independent truckers bringing material into the site will use the early hours to bypass weigh scales, and other legal requirements designed to protect the public. The EIR needs to explain this issue in detail and answer the following: What type of business will they be conducting at such an early hour? What type of noise will this generate? We are concerned this will be a real hardship for the neighbors near this project, or residential neighborhoods that will get truck traffic from this project. Will residents near the site

be listening to large trucks idling as they are staging before 5 am to enter the site? There is a noise ordinance that needs to be adhered to. It starts at 7 am.

- b. The EIR needs to address how the project will be able to adhere to the Noise Ordinance with the type of demolition such as rock crushing, blasting, etc., that they will be conducting. If the project cannot follow the noise ordinance the EIR needs to identify why it can't.
- c. The EIR should identify what the containers used for transportation of material will be made of. Will they be metal containers? The neighbors will be exposed to the constant "clanging" every time something is dumped into the containers.
- d. The EIR should consider mitigation measures such as building a sound wall and/or using rubberized road surface to help reduce noise created by the project.

Environmental Hazards:

Another concern is how hazardous waste will be handled. We have been told at past meetings that workers at the project site will be visually inspecting each load as it enters. However, this is no guarantee that hazardous materials will be missed. Who is to say that the hazardous materials are not going to be placed in the center of the load where they will not be detected. What happens if they are then detected after the load has been dumped and the dumping party has left the site? The EIR needs to identify how this will be addressed and what checks and balances will be used to ensure compliance.

Fire Plan:

The NOP states that C&D mulch can stay on site for 90 days. Our fear is for a mulch fire on site. Last year there were several mulch fires around the county and they burned for days. The EIR needs to include a discussion of how will the Fire Plan address and provide detailed mitigation measures. If one of the mitigation measures involves the use of water to keep the mulch pile cool so that it won't ignite, then the EIR should identify the amount of water needed and how that will be acquired given the ongoing drought status.

Water:

The project stands to use a tremendous amount of water. We are in a severe drought with no relief in sight. The EIR needs to study if there will be water available and how its use for this project may reduce the amount of water for other agricultural and residential uses.

Traffic:

According to the NOP, the project is only allowed two outbound trucks per day. The EIR needs to identify if this will be a single truck load or a truck with multiple beds, each carrying a load.

Other Issues:

We are concerned that this project won't be economically feasible. The EIR needs to provide a long-range business plan for the project so the public is assured taxpayers won't be on the hook should the project fail, leaving behind a site that requires millions to clean up.

The EIR should also address how the proposed project could damage property values and adjacent properties that are zoned residential. The devaluation of property value will cause a decline in the comparison value or “comps” for people who are trying to sell their property who may not even live next to the site. The EIR needs to study industrial activities of this type that have impacted neighborhoods in the past so the public can be assured the neighborhood will not become blighted. The EIR should also study how this project will impact the Community Character.

The project applicant is notorious for not getting the appropriate licenses. The Community is aware of this and is quite skeptical that he will adhere to the rules and conditions he needs to follow. The Community is also concerned with “piece-mealing” where the applicant understates his project to get approval and then after approval increases his capacity.

Thank you for listening to our concerns regarding this Notice of Preparation.

Sincerely,

Sandra Farrell
Chair, Twin Oaks Valley Community Sponsor Group
Karen Binns
Vice Chair, Twin Oaks Valley Community Sponsor Group

Cc: Beth Ehsan

California Home

Thursday, October 16, 2014



OPR Home > CEQAnet Home > CEQAnet Query > Search Results > Document Description

North County Environmental Resources (NCER) Recycling Facility**SCH Number:** 2014091033**Document Type:** NOP - Notice of Preparation**Project Lead Agency:** San Diego County**Project Description**

The project is a recycling facility for tree branches and logs; wood and construction debris; and concrete, asphalt, and inert material (CDI) from demolition projects. Only pre-sorted, non-contaminated tree waste, wood and construction debris would be accepted for processing and there would be no composting or acceptance of solid waste. NCER is anticipated to produce two truckloads per day (approximately 48 tons per day, 15,000 net tons annually) of finished product.

Contact Information**Primary Contact:**

Beth Ehsan
San Diego County
858 684 3103
5510 Overland Avenue, Suite 110
San Diego, CA 92123

Project Location

County: San Diego
City: Escondido
Region:
Cross Streets: Mesa Rock Road and Deer Springs Road
Latitude/Longitude: 33° 10' 9" / 117° 6' 44" [Map](#)
Parcel No: 187-100-23, 187-100-37, 187-100-38
Township: 11S
Range: 2W
Section: 32
Base: SBB&M
Other Location Info:

Proximity To

Highways: I-15
Airports: No
Railways: No
Waterways: No
Schools: 11
Land Use: High Impact Industrial (I-3), M54

Development Type

Industrial

Local Action

Site Plan, Other Action (BA/CC)

Project Issues

Aesthetic/Visual, Air Quality, Biological Resources, Noise, Toxic/Hazardous, Water Quality, Other Issues (GHGE)

Reviewing Agencies (Agencies in **Bold Type** submitted comment letters to the State Clearinghouse)

Resources Agency; Department of Parks and Recreation; **Resources, Recycling and Recovery**; Department of Fish and Wildlife, Region 5; **Native American Heritage Commission**; California Highway Patrol; Caltrans, District 11; Air Resources Board, Major Industrial Projects; Department of Toxic

Substances Control; Regional Water Quality Control Board, Region 9

Date Received: 9/12/2014 **Start of Review:** 9/12/2014 **End of Review:** 10/13/2014

[CEQAnet HOME](#) | [NEW SEARCH](#)

Attachment “D”

North County Environmental Resources (NCER) R

Summary

SCH Number	2014091033
Lead Agency	San Diego County
Document Title	North County Environmental Resources (NCER) Recycling Facility
Document Type	NOP - Notice of Preperation
Received	9/12/2014
Present Land Use	High Impact Industrial (I-3), M54

Document Description	The project is a recycling facility for tree branches and logs; wood concrete, asphalt, and inert material (CDI) from demolition proje contaminated tree waste, wood and construction debris would b there would be no composting or acceptance of solid waste. NCE truckloads per day (approximately 48 tons per day, 15,000 net to
-----------------------------	--

Contact Information	Beth Ehsan San Diego County 5510 Overland Avenue, Suite 110 San Diego, CA 92123 Phone : (858) 694-3103
----------------------------	--

Location

Coordinates 33°10'9"N 117°6'44"W

Cities Escondido

Counties San Diego

Review Period Start 9/12/2014**Review Period End** 10/13/2014**Development Type** Industrial (12000 Sq. Ft., 35.5 Acres, 18 Employees)**Local Action** Site Plan Other Action Other Action: BA/CC**Project Issues** Aesthetic/Visual Air Quality Biological Resources Noise Toxic/Hazardous
Other Issues: GHGE**Reviewing Agencies** Air Resources Board, Major Industrial Projects California Department of Fish and Wildlife
California Department of Parks and Recreation California Department of Transportation
California Highway Patrol Department of Toxic Substances Control Regional Center for the Environment
Resources Agency Native American Heritage Commission Resources, Recycling and Waste Management

Disclaimer: The document was originally posted before CEQAnet had the capability to host attachments for this document, please contact the lead agency at the contact information provided or contact the OPR via email at state.clearinghouse@opr.ca.gov or via phone at (916) 445-0613.

Attachment “E”



County of San Diego, Planning & Development Services
FAQs - CEQA 15183 Exemption Process
ZONING DIVISION

What is the CEQA §15183 exemption process?

California Environmental Quality Act (CEQA) Guidelines Section 15183 allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified.

The County of San Diego certified an EIR for the General Plan Update (GPU) on August 3, 2011. Projects that are consistent with the densities and use characteristics considered by the GPU EIR may qualify for the 15183 exemption process.

How do I know if my project qualifies for a 15183 exemption?

Projects submitted with an Application for an Environmental Initial Study ([PDS-367](#)) will be automatically evaluated for eligibility by the assigned Planning & Development Services (PDS) project manager. In order to qualify for a CEQA 15183 exemption, the following findings must be made:

1. The project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.
2. There are no project specific effects which are peculiar to the project or its site.
3. There are no project specific impacts which the GPU EIR failed to analyze as significant effects.
4. There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.
5. There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.

What types of projects qualify for the 15183 process?

Most subdivisions (Tentative Maps, Tentative Parcel Maps) that do not include other discretionary permit types will qualify for the 15183 process. Minor permit types, such as Boundary Adjustments, Site Plans, and Administrative Permits may also qualify if not otherwise exempt from CEQA. Major and Minor Use Permits may qualify only if the use type and operating characteristics are consistent with the analysis performed for the GPU EIR. General Plan Amendments, Specific Plan Amendments, and Rezones will generally not be eligible unless the proposed change is minor in nature and remains consistent with the GPU EIR analysis.

How is the 15183 exemption process different from other CEQA exemptions?

The 15183 exemption process typically requires a more detailed environmental analysis than other CEQA statutory and categorical exemptions. Unlike other exemptions, mitigation may also be required under the 15183 process. Projects which qualify for a categorical or statutory exemption will generally not benefit from the 15183 process.



**County of San Diego, PDS, Zoning Division
FAQs CEQA 15183 Exemption Process**

Continued

How is the 15183 process different than the ND or EIR process?

CEQA section 15183 requires an evaluation of direct project impacts in the same manner as the Negative Declaration (ND) and EIR process. However, unlike a ND or an EIR, projects which rely on the 15183 process may benefit from the cumulative analysis contained within GPU EIR and the application of predefined mitigation and avoidance measures. Under this process, public review is not required therefore projects qualifying for the 15183 exemption can generally be completed in less time and at a reduced cost compared with the Negative Declaration and EIR processes.

Are environmental technical studies required under the 15183 process?

A project-specific environmental analysis must be completed as part of the 15183 process. Technical studies, such as a biological technical report or a traffic impact analysis, may be required if a project would result in a potential environmental impact.

Do cumulative impacts need to be studied under the 15183 process?

Additional analysis of cumulative impacts will generally not be required unless it is determined that the project may result in an impact which was not adequately evaluated in the GPU EIR.

Is mitigation required under the 15183 process?

In order to rely on the 15183 process, project proponents must agree to implement any applicable design and/or mitigation measures as prescribed by the GPU EIR.

How will the 15183 determination be documented?

Your PDS project manager will complete a Certificate of Determination and a CEQA Guidelines §15183 checklist to document a project's eligibility.

Is a public hearing required?

CEQA requires a noticed public hearing if mitigation or design standards specified in the GPU EIR are proposed to reduce a project impact. Projects which require a public hearing as part of the permit approval process will satisfy this requirement through regular hearings before the Zoning Administrator, Planning Commission, or Board of Supervisors. Special publicly noticed hearings will be held for projects which would not otherwise require a hearing.

Are there any recording Fish and Game or recording fees associated with the 15183 process?

No Fish and Game fees are required; however, a \$50 fee is required to record a Notice of Exemption.

***For additional information, contact
PLANNING & DEVELOPMENT SERVICES
(858) 565-5981***

Attachment “F”



Planning & Development Services

North County Environmental Resources

PDS2008-3500-08-015; PDS2013-BC-13-0019; PDSXXX-HLP-XXX, LOG NO. PDS2008-3910-0808012

Legal Ad/Public Disclosure Notice

CEQA 15183 Checklist

Ordinance Compliance Checklist

Climate Action Plan Checklist

Visual Impact Report

Negative Cultural Resources Survey Report (Dudek)

Negative Cultural Resources Survey Report (Brian Smith)

Acoustical Analysis

Air Quality and Greenhouse Gas Memorandum

Biological Assessment Report

Analysis of California Gnatcatcher Movement

Vegetation Map and Impacts Updated Memorandum

Fire Protection Plan

Geotechnical Investigation Analysis

Geotechnical Report Addendum

Priority Development Project (PDP) Stormwater Quality Management Plan

Preliminary Hydrology/Drainage Study

Hazardous Materials Load Check/Materials Program

Vector Management Plan

Traffic Assessment

ADDITIONAL ITEMS

Vicinity Map

Plot Plan

Preliminary Grading Plan

Boundary Adjustment Plat

Habitat Loss Permit (HLP) Findings *Comments associated with the Draft Habitat Loss Permit Findings must be received no later than Monday, October 28th at 4:00 PM (a 45-day Public Review Period)

Landscape Plans

Sibbet, David

From: Aaron J. Ehrlich <aehrich@berdingweil.com>
Sent: Monday, October 28, 2019 1:51 PM
To: Sibbet, David
Subject: FW: Public Comment Letter re 15183 Exemption for NCER Project
Attachments: 15183 Exemption re NCER Project Public Comment Letter.pdf

Dear Mr. Sibbet,

I am following up on my below email. Would you kindly confirm receipt of the attached public comment letter?

Thank you,

Aaron J. Ehrlich | Partner
aehrich@berdingweil.com | [Profile](#) | [vCard](#)



WALNUT CREEK	COSTA MESA	SAN DIEGO
2175 N California Blvd.	575 Anton Blvd.	1660 Hotel Circle North
Suite 500	Suite 1080	Suite 701
Walnut Creek	Costa Mesa	San Diego
CA 94596	CA 92626	CA 92108
P 925.838.2090	P 714.429.0600	P 858.625.3900
F 925.820.5592	F 714.429.0699	F 858.625.3901

www.berdingweil.com | [LinkedIn](#) | [Facebook](#)

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From: Aaron J. Ehrlich
Sent: Monday, October 14, 2019 5:48 PM
To: 'david.sibbet@sdcounty.ca.gov' <david.sibbet@sdcounty.ca.gov>
Subject: Public Comment Letter re 15183 Exemption for NCER Project

Dear Mr. Sibbet,

Please find attached a copy of our office's public comment letter on behalf of the Montreux Homeowners Association concerning the County of San Diego's Notice of Intent to Adopt Findings Pursuant to Section 15183 of the California Environmental Quality Act for the Proposed North County Environmental Resources Project. We would appreciate your acknowledgement of receipt of this letter; we can also hand-deliver a hard copy if requested. Thank you kindly for your consideration.

Best,

Aaron J. Ehrlich | Partner
aehrllich@berdingweil.com | Profile | vCard



WALNUT CREEK	COSTA MESA	SAN DIEGO
2175 N California Blvd.	575 Anton Blvd.	1660 Hotel Circle North
Suite 500	Suite 1080	Suite 701
Walnut Creek	Costa Mesa	San Diego
CA 94596	CA 92626	CA 92108
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F 925.820.5592	F 714.429.0699	F 858.625.3901

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Sibbet, David

From: SFarrell <slfarrell@cox.net>
Sent: Wednesday, September 25, 2019 9:12 PM
To: Sibbet, David
Subject: North County Environmental

Hi David,

Thank you very much for listening to resident's concerns Tuesday night. As you can see this project brings up some important issues. I-15 may create a significant amount of noise but not at 5am. In addition if the truck queue up to beat the I-15 traffic and Deer Springs becomes a parking lot then they will be doing so before 5am. This will create noise and I need to go through the noise study to see if this has been calculated. Has the applicant said why he wants to start earlier than other similar facilities?

Sandra



State of California – Natural Resources Agency
 DEPARTMENT OF FISH AND WILDLIFE
 South Coast Region
 3883 Ruffin Road
 San Diego, CA 92123
 (858) 467-4201
 www.wildlife.ca.gov

GAVIN NEWSOM, Governor
 CHARLTON H. BONHAM, Director



October 28, 2019

Mr. David Sibbet
 County of San Diego Planning and Development Services
 5510 Overland Avenue, Ste. 310
 San Diego, CA 92123

Subject: Draft Habitat Loss Permit for the North County Environmental Resources Project, San Diego County, California

Dear Mr. Sibbet:

The California Department of Fish and Wildlife (Department) has reviewed the proposed North County Environmental Resources project (Project) draft Habitat Loss Permit (HLP). The Project was previously referred to as the ADJ project in records and meetings. The comments provided in this letter are based on information provided in the draft HLP and associated documents, including the Biological Resources Technical Report (BTR) prepared by BLUE Consulting Group, dated December 14, 2012 and revised March 10, 2013; meetings and discussions with County staff; our knowledge of sensitive and declining vegetation communities in the County; and our participation in regional conservation planning efforts including the County's draft North County Multiple Species Conservation Plan (MSCP).

The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA), Sections 15386 and 15381, respectively. The Department is responsible for the conservation, protection, and management of the State's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA), and administers the Natural Community Conservation Planning (NCCP) program. The County has signed a Planning Agreement with the Department and the U.S. Fish and Wildlife Service (USFWS) for the development of the North County MSCP, an NCCP/HCP that is currently in preparation for unincorporated lands in north San Diego County.

The Project site consists of six parcels totaling 138.12 acres, located at 25568 Mesa Rock Road and adjacent to the west side of the I-15, within unincorporated San Diego County. The Project proposes recycling facilities and operations that would result in a total impact of 20.52 acres, of which 13.75 acres support sensitive plant communities, including 11.82 acres of Mafic southern mixed chaparral (SMC), 1.91 acres of coastal sage scrub (CSS), and 0.02 acre of willow scrub. The remaining 6.77 acres of impacts consists of previously developed/disturbed areas associated with borrow pit activities and public access. In addition, of the 20.52 total acres, 12.88 were previously impacted by unauthorized grading, including 6.48 acres of SMC and 0.92 acre of CSS.

While the proposed Project site supports CSS, protocol surveys for the federally threatened coastal California gnatcatcher (*Polioptila californica californica*, gnatcatcher) indicated that the site was unoccupied; however, there are documented gnatcatcher locations within approximately 2/3 of a mile from the Project site. Portions of the Project site occur within Pre-Approved Mitigation Area (PAMA) identified in the draft North County MSCP. All of the biological open space provided on site will be located within PAMA.

Mr. David Sibbet
County of San Diego Planning and Development Services
October 28, 2019
Page 2 of 2

The Department offers the following comments on the proposed Project and associated draft HLP in order to assist the Project in avoiding, minimizing, and adequately mitigating Project-related impacts to biological resources, and to ensure that the project is consistent with ongoing regional habitat conservation planning efforts:

- 1) Biological surveying, particularly for nesting birds, should occur with 3 days (72 hours) prior to potentially impactful activities. Where activities will occur adjacent to potential gnatcatcher or raptor nesting habitat, surveys should occur within 300 ft. and 500 ft. of such habitat, respectively. We recommend the draft HLP Conditions of Approval regarding biological monitoring be updated to reflect these criteria.
- 2) If nesting birds are found within the vicinity of the construction activities, it is the responsibility of the Lead Agency and project applicant to identify and implement appropriate buffers and other avoidance and minimization measures to ensure the project does not result in the destruction of bird nests and eggs. State law does not provide an avenue for the Department to approve or concur on the adequacy of nest avoidance measures to avoid take. Therefore, the Department cannot concur that brushing, clearing, and/or grading may occur during the breeding season. This determination lies with the Lead Agency. As such, the Department requests that all language referring to such concurrence be removed from the draft HLP Conditions of Approval.
- 3) The Department would also like to make the Project applicant aware of potential permitting issues for the take of federally listed species. As stated above, the Project site supports CSS and gnatcatcher has been recorded within 2/3 of a mile of the project site. The Planning Agreement for the draft North County MSCP expires January 31, 2020. Due to limited forward progress made on draft North County MSCP planning efforts, the HLP process may not be available after that date. The Planning Agreement may not be updated until the County Board of Supervisors commits continued staff time to, and approves funding and additional resources for, the development of the draft North County MSCP. In the interim, without an active Planning Agreement, new HLPs, as provided for via the USFWS 4(d) rule for take of gnatcatcher, would not be available and previously issued ones may not be valid. Additional protocol-level gnatcatcher surveys to confirm the site is not occupied may also be then required. If the site were then determined to be occupied, it the Project would need to pursue an incidental take permit through the USFWS.

Thank you for the opportunity to comment on the subject draft HLP. If you have any questions, please contact Carol Williams of the Department at Carol.Williams@wildlife.ca.gov or (858) 637-5511.

Sincerely,



Gail K. Sevens
Environmental Program Manager
South Coast Region

ec: Jonathan D. Snyder, USFWS

Sibbet, David

From: GLORIA FOOTE <GLORIA.FOOTE@financialfocusllc.com>
Sent: Tuesday, October 22, 2019 1:47 PM
To: Sibbet, David
Cc: Wardlaw, Mark
Subject: NCER Plan

Dear David – I realize I’m not the only person who is outraged by the above referenced Plan and I know you’ve heard it all before. That said, I want to reiterate my concerns and my disgust with the way this has and continues to be handled by those who are both hired and elected to have the citizens’ best interest at heart. That the county would be able to force this abomination on the residents of the immediate area without the benefit of an environmental impact report is beyond the pale. Likely and EIR would be of no help to the residents in that those who want the recycling plant would make that happen anyway but they should have to have one. Though my home is not right by the plant, the county will have destroyed the values of the residents who live on Mesa Rock Rd. Further, you will have none nothing to enhance the homes of those within sight and hearing of the plant. Shame on you folks.

The other issues are destroying our beautiful rural atmosphere by cutting into the mountain side and the emissions the demolition will carry on the winds from the west to all of our properties. The noise pollution will be tremendous and you all know it.

The hours of operation will be from 5:00 a.m. to 7:00 p.m. six days a week which is in violation of GP Policy N-5.2. The noise and dust from this nightmare will be horrible. The traffic at I-15 and Deer Springs is already almost unbearable. Going north on City Center Parkway to Mountain Meadow, no more than three cars at best can turn left/West from 7:00 a.m. to 9:30 a.m. because of the amount of traffic coming south. There are now four stoplights in less than 100 yards as you attempt to cross the Deer Springs overpass so please enlighten me on how you expect people to navigate an already disastrous intersection by adding these trucks. No green arrows, no “no right on red” signs, and, largely, no common sense. Many traveling Champagne Blvd/No Center City Pkwy are elderly – very – and this is not going to be safe for them. (Champagne Blvd becomes No Center City Parkway as it crosses Mountain Meadow.)

Our community will be polluted with the emissions, the noise, the dust and all the trucks that will be in and out of our rural area. Never mind the fact that over 6,100 of the residents will now have to look at this industrial site rather than the hills we have enjoyed in the past.

How is this happening? How can the county come into a residential community, change the zoning, destroy property values, disrupt the serenity of an area from dawn until dusk, pollute the air and our surroundings and think it’s okay, or worse, not care? So now the county proposes to fast-track the environmental review through an unsupported and inapplicable exemption to limit public participation. What’s really happening underneath all of this, David? Who made it possible for the EIR to be waived? This is an inappropriate project in an inappropriate location and the county knows it. It’s very clear that “they” have no respect for the residents nor do they give a rip about their homes or their families. As I mentioned to you at the first meeting, the county would not allow my husband and me to build 40x60 shed on our property for storage without an EIR. We didn’t want water or electricity – just storage. The closest neighbor isn’t within 60 yards of our shed. The cost became prohibitive so no shed. Help me out here. How can you folks get this done with no EIR when the private citizen is burdened with your rules and regulations? I must say, something smells really bad here.

Gloria D. Foote, CFP®

It's not what you gather, but what you scatter that tells what kind of life you have lived.
--Helen Walton, Noted Philanthropist

Financial Focus LLC
1917 Palomar Oaks Way #130
Carlsbad, CA 92008
Phone: 760-431-3040
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Sibbet, David

From: [D1] Douglas N Formby Sr <formby11@gmail.com>
Sent: Saturday, October 26, 2019 9:49 AM
To: Sibbet, David
Subject: NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008-3500-08-015, LOG NO. PDS2008-3910-0808012
Attachments: D-1 OPPOSITION LETTER 2019-10-26_094436.pdf

PLEASE SEE ATTACHED.

"Blessed To Be A Blessing!

[D-1] Douglas N. Formby, Sr.
949 205 6834 [Cell]

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Douglas N. Formby
1349 Vista Ave
Escondido CA 92026

10/26/2019

David Sibbet, Planning Manager *[via email to David.Sibbet@sdcounty.ca.gov]*
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Subject: NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008-3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

I am a resident in the Canyon View Homeowners Association, a community approximately two miles east of the proposed North County Environmental Resources project ("Project"). I submit this public comment letter concerning the proposed section 15183 exemption ("Proposed Exemption") as the County of San Diego ("County") should require the applicant, Hilltop Group Inc. ("Applicant"), to prepare an Environmental Impact Report ("EIR") for the Project due to its foreseeable significant environmental impacts which will impact my family's and my community's health and well-being. I am dismayed that the County, having determined in 2015 that the Project requires an EIR, now proposes to fast-track environmental review of the Project through an unsupported and inapplicable exemption to limit public participation contrary to CEQA's requirements.

It is inappropriate for the County to base proposed findings supporting the Proposed Exemption on technical reports, many of which are five to ten years old and do not reflect existing baseline conditions, and others which are explicitly drafts or preliminary in nature. The alleged findings of these unreliable reports do not support the necessary findings for the Proposed Exemption. Moreover, many of the technical reports speciously limit their analysis to how the Applicant says it will operate the Project instead of analyzing the Project's maximum permitted use, thereby minimizing the Project's impacts by violating CEQA's mandate that a project's foreseeable environmental impacts be **analyzed on its maximum use**. An EIR is needed to ensure that these concerns are addressed and so there is public transparency for this highly controversial project.

The peculiar presence of an industrial processing facility largely surrounded by residential areas will be disruptive and have myriad significant environmental consequences on nearby residents, including:

- Particulate emissions from demolition and leveling on mountain side as well as from operation of crushing and grinding and material handling equipment outdoors.
- Noise from explosive blasting during construction phase and then the operation phase of crushing and associated equipment on site.
- Operating hours of 5:00 AM - 7:00 PM, 6 days a week contrary to General Plan Policy N-5.2.

Douglas N. Formby
1349 Vista Ave
Escondido CA 92026

- Noise and dust from fully loaded trucks entering and leaving site through Mesa Rock Road, Center City Parkway and the Deer Spring overpass.
- Community is burdened with monitoring and reporting violations including gas emissions, noise, dust, or truck loads in and out. Monitoring equipment not included in project.
- Excessive grading of an iconic hill and rock known by residents with affection as Bear Rock.
- A facility to be perched on high level grade in view of over 6100 residents.

I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Formby', with a stylized flourish at the end.

Douglas N. Formby

Sibbet, David

From: Suzan Fornof <sdfornof@cox.net>
Sent: Wednesday, October 16, 2019 7:14 PM
To: Sibbet, David
Subject: Proposed NCER facility

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Dear Mr. Sibbet,

I am writing to you in great concern about the rock crushing facility proposed near my home. This noisy business is not appropriate for our rural peaceful and idyllic life in this neighborhood. We have an older home with a concrete pool. Do you think there will not be damage from their blasting mountains for days straight? The dust, noise and disturbance will be immediately noticeable. You would not want this near your home. I expect you to respect our life and home here. You need to refuse this business to be allowed in this location. It is not conducive to this area.

Suzan and Tom Fornof
2182 Rockhoff Road
Escondido, CA 92026

Sent from my iPad

Sibbet, David

From: Judith Francello <jat1317@cox.net>
Sent: Wednesday, October 16, 2019 9:09 AM
To: Sibbet, David
Subject: Opposition

Good morning, Mr. Sibbet.

My husband and I are residents in The Summit, a division of Hidden Meadows. We have lived here 15 years and chose this area because of its quiet, natural environment.

We strongly oppose the installation of a concrete crushing facility being proposed at Mesa Rock Road just west of I-15. The air pollution from the dust and gas emissions and the noise from the facility and from the trucks accessing it is totally objectionable. Storage of flammable wood waste in that area would be beyond dangerous. The negative impact that facility would have on the surrounding residential areas is unconscionable.

Please do all you can to keep this from happening.

With sincere thanks, Judith Francello

Gene and Judith Francello
10565 Pinion Trail
Escondido CA 92026
858-205-2220 – Gene
858-361-9615 - Judy

Sibbet, David

From: Todd Frank <tfranksh@gmail.com>
Sent: Tuesday, October 22, 2019 8:57 AM
To: Sibbet, David
Subject: North County Recycling Center

Dave,

A couple quick questions - in County Ordinance 6975 it states:

"A light processing facility shall be no larger than 45,000 square feet and shall have no more than an average of 2 outbound truck shipments of material per day;"

1. How large is a "truckload?"

2. I have read repeatedly that the applicant will be able to legally export 174 tons of finished product per day from the recycling center. Where is that noted in the ordinances, or where is that written in any County resource? How does that square with 2 truckloads unless we are talking about tractor trailers?

I appreciate your time.

Ordinance - <https://www.sandiegocounty.gov/content/dam/sdc/pds/zoning/z6000.pdf> page 281
Todd

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David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123
David.sibbet@sdcounty.ca.gov

OPPOSITION TO THE NORTH COUNTY ENVIRONMENTAL RESOURCES PROJECT

As a resident of the Montreux Homeowner's Association, I am writing to express my opposition to the North County Environmental Resources project. The presence of an industrial recycling center in this residential area would be disruptive and have a number of negative consequences for local residents. It also contradicts the County's Strategic Goal of "Safe and Livable Communities;" a phrase often attached to County initiatives and a laudable goal, but inconsistent with this project. With the available information we cannot be sure that our community will be safe or livable should the North County Environmental Resources project go forward.

The site is inappropriate for the rural residential character of the neighborhood, as evidenced by the fact that the three parcels owned by Hilltop are the only ones in the area zoned for high-impact industrial M54 use – and this zoning was done arbitrarily against the recommendation of the City of Escondido and the Twin Oaks Valley Community Sponsor Group. Only Supervisor Horn and the applicant believed this was a proper location for a construction debris recycling plant – and tellingly, neither of them lives in the area.

I believe the following issues need to be addressed before this project can proceed:

The Need for This Recycling Center: The County's Integrated Waste Management Plan (2008) lists a number of alternative construction and demolition recycling facilities. In looking at the addresses for each, none appear to be in areas with residential zoning and housing in such close proximity as this planned site.

https://www.sandiegocounty.gov/content/dam/sdc/common_components/images/dpw/recyclingpdfs/2008NDFE1.pdf

The California Public Resources Code 41732 mandates that all reporting jurisdictions, *"shall include a description of any new solid waste facilities and the expansion of existing solid waste facilities that will be needed to implement the jurisdiction's source reduction and recycling element and to thereby meet the diversion requirements of Section 41780 . The nondisposal facility element may include the identification of specific locations or general areas for new solid waste facilities that will be needed to implement the jurisdiction's source reduction and recycling element."*

The County's Plan states, *"As the County continues to develop its diversion programs, C&D and organic operations are expected to help exceed the AB 939 mandates. The facilities in this NDFE include those with CIWMB SWIS numbers, proposed facilities, and facilities that do not need a CIWMB permit. These non-disposal facilities will serve as the County's core facilities to achieve its waste diversion goals of PRC Section 41780 and implement its SRRE."* (emphasis mine)

In other words, there doesn't appear to be a need for more C&D facilities. Filling that supposed need was the stated goal for the re-zoning of the property in 2005 and 2011 (Attachment H). There is no "need" for a project of this type that is so incompatible with the surrounding area. Spot zoning of the type exhibited here should only be done when an overriding need is present for the community as a whole. Even then, sufficient justification should be made in any planning or approval documents to inform and reassure the local community of the need. Sufficient mitigation should also be demanded to minimize the impacts on nearby neighborhoods.

CEQA 15813 Process: Those in opposition to this project have two questions yet to be answered:

1. Who decided that a full Environmental Impact Report, which was required by the County Planning and Development Services (PDS) Department in 2015, was no longer needed? (Attachments A and B)
2. What was the reason(s) for that change?

Receiving answers to these questions is critical for maintaining trust between County government and the residents of this area. Although we were given some information on the process during our September 24th public meeting in San Marcos, we were specifically told that County PDS staff were not there to answer questions. Although you were more responsive at the Twin Oaks Valley Community Sponsor Group's meeting on October 16th, and the Hidden Meadows Community Sponsor Group's meeting on October 24th, we still haven't received direct answers to those questions. Also, was there communication between the staff of any elected officials to PDS that influenced the decision to provide a 15183 exemption for this project?

Replying to these basic queries will help residents believe the process is fair and our health and safety is being taken into consideration. By not answering them, the reasons for the change are open to interpretation and conjecture, neither of which are conducive to a trusting relationship between PDS and the public.

Air Quality: Possible negative health consequences due to decreased air quality and a lack of emissions monitoring from this site is a real concern among residents. Emission of silica dust from concrete crushing and handling operations on the facility is a particular concern. Those downwind from the facility may be significantly impacted by particulates and other contaminants in the air as the prevailing winds in our area blow directly from the project site to our neighborhoods. The impacts will extend to areas along Mesa Rock Road and Centre City Parkway because of the truck traffic carrying the waste material to and from the site.

I recently visited the area of Slaughterhouse Canyon Road in Lakeside and evidence of airborne and vehicle-borne contaminants from the industrial activity there was widespread and obvious on the surrounding vegetation and roadways. Similar activity of an unknown quantity is planned for our neighborhood with residential areas in much closer proximity than is found in Lakeside.

Air Quality Monitoring: The project scope is severely lacking in terms of appropriate monitoring and alert systems for emissions, in fact there are none proposed or planned. There is a vagueness regarding the rate and duration the processing equipment will operate. Emissions are directly related to the operating rates and these estimates must be made specific enough to properly calculate emissions. Only then will we know what the real impacts are.

The applicant states that they will ship 2 truckloads – 48 tons/day of product, half of which will be crushed aggregate from construction debris. The site is allowed 174 tons/day of product- the facility could accumulate a week's worth of incoming material and process it in less than a day, thus grossly exceeding particulate threshold limits. Emissions should be calculated on the basis of operating capacity of the processing equipment used on site and the hours of operation allowed per day. What kind and how many types of machinery will be operating at the site? This simple question has not been answered in the applicant's paperwork.

Instead of increasing transparency, it appears the 15183 process is the antitheses; and perhaps it was chosen for that reason. We were specifically told the 15813 process does not require public review. This is an outrageous change in process after the vociferous and varied opposition to this project from its outset.

In terms of the 15183 process, I don't believe adequate mitigation has been established to an extent that satisfies the General Plan Update EIR Mitigation Procedures sections:

7.1.3.5 Issue 5: Objectionable Odors: The proposed project would not result in a significant direct or cumulative impact associated with objectionable odors.

This element has not been addressed. There is a well-known odor element present when traveling near green waste facilities. Although it was mentioned in the original justification letter to the Board of Supervisors (Attachment H), odor was not mentioned in any of the technical reports that I examined.

On a related note: *COS-17.5: Methane Recapture. Promote efficient methods for methane recapture in landfills and the use of composting facilities and anaerobic*

digesters and other sustainable strategies to reduce the release of GHG emissions from waste disposal or management sites and to generate additional energy such as electricity.

COS-18.2: Energy Generation from Waste. Encourage use of methane sequestration and other sustainable strategies to produce energy and/or reduce GHG emissions from waste disposal or management sites

COS-14.8: Minimize Air Pollution. Minimize land use conflicts that expose people to significant amounts of air pollutants.

The mitigation of these issues cannot be discussed until the “worst-case scenario” for air pollution is examined. All the reports attached to this project refer to 48 tons of outgoing material, 27% of the legal operating capacity.

COS-14.9: Significant Producers of Air Pollutants. Require projects that generate potentially significant levels of air pollutants and/or GHGs such as quarries, landfill operations, or large land development projects to incorporate renewable energy, and the best available control technologies and practices into the project design.

As above, the maximum output has not been examined. This mitigation step specifically mentions quarries and landfills; operations that utilize similar equipment and procedures to this site – especially during the initial blasting and grading operations. The applicant claims that 48 tons of material will be produced daily, and the environmental impact reports submitted are based on that level of output. The applicant is legally allowed to produce 174 tons daily which would vastly increase impacts to the surrounding area and render their submitted environmental reports invalid. If the applicant’s production levels are not capped at the current estimate of 48 tons per day, the environmental studies submitted the County are no longer accurate or valid in terms of representing real-life levels.

Production: It appears the production levels may have been purposely lowered to a point where the established General Plan EIR mandates are complied with.

Even if the production levels are limited by the County to 48 tons/daily, enforcement to ensure compliance with that standard would be left to County Code Enforcement. Residents have had some experience with code enforcement and understand they are overworked and understaffed. We have little confidence any meaningful enforcement will be forthcoming. If caught violating the production limits, the profits derived from the illegal activity would undoubtedly exceed the costs in terms of fines.

Noise: The application paperwork indicates that machinery capable of delivering and processing concrete and other building materials will operate between the hours of 5am to 7pm, Monday through Saturday. This shows a complete lack of concern the applicant has regarding those who live around this site. These operating hours are far outside the mainstream of other similar businesses. The residential area around the facility would be severely impacted – residents may not be able to enjoy their property, particularly outside, while this plant is in operation. Those living nearby may be awakened at 5am from the noise. Any masking effect assumed from the existing traffic on I-15 is vastly reduced at 5am – no ambient noise measurements of freeway traffic appear to have been made at that time.

According to the applicant's own report, the Supplementary Noise Technical Analysis (page 3), the anticipated nighttime noise may exceed established County limit of 57.5 decibels. When operated together, the wheel loader and C&D crusher will emit 58 decibels of sound according to the report. Since the plans submitted for the site do not contain a description of the types of machinery being employed, we believe the noise levels cannot be accurately estimated by the applicant's consultant. What machinery, given a worst-case scenario, will be operated simultaneously? What would the noise level be given those conditions?

The estimates provided in the report do not appear to have been tailored to this specific site. Instead, the reporting company used generic formulae and information.

The area around the proposed center is shaped like an amphitheater – the sound will be reflected toward the neighborhoods to the east, and unless that feature has been considered, the noise estimates in the acoustic study will be lower than reality. After the applicant uses explosives on the bottom of the hillside, exposed rock will have a more reflective quality than the existing vegetation and soil. The only mentions of topography was the mitigating effects of hills between the site and the neighborhood to the east – the mitigating factors. The shape of the hillsides is an aggravating factor that wasn't discussed.

Given the information provided to us, I don't believe the General Plan Update Policies and Mitigation Measures below were satisfied in the existing documentation, thus the CEQA 15183 exemption should not be valid for this project.

7.1.11.1 Issue 1: Excessive Noise Levels

Policy LU-2.8: Mitigation of Development Impacts. Require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, vibrations, dust, odor, aesthetic impairment and/or are detrimental to human health and safety.

Policy N-1.4: Adjacent Jurisdiction Noise Standards. Incorporate the noise standards of an adjacent jurisdiction into the evaluation of a proposed project when it has the potential to impact the noise environment of that jurisdiction. The City of Escondido is very close to this project – so close in fact, they opposed the project when it was first proposed. I didn't see any mention of Escondido in the acoustic report.

Policy N-1.5: Regional Noise Impacts. Work with local and regional transit agencies and/or other jurisdictions, as appropriate, to provide services or facilities to minimize regional traffic noise and other sources of noise in the County.

Policy N-2.1: Development Impacts to Noise Sensitive Land Uses. Require an acoustical study to identify inappropriate noise level where development may directly result in any existing or future noise sensitive land uses being subject to noise levels

equal to or greater than 60 CNEL and require mitigation for sensitive uses in compliance with the noise standards listed in Table N-2 of the Noise Element.

7.1.11.3 Issue 3: Permanent Increase in Ambient Noise Levels

Policy LU-2.8: Mitigation of Development Impacts. Require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, vibrations, dust, odor, aesthetic impairment and/or are detrimental to human health and safety.

Policy N-5.1: Truck Access. Design development so that automobile and truck access to industrial and commercial properties abutting residential properties is located at the maximum practical distance from residential zones.

Policy N-6.4: Hours of Construction. Require development to limit the hours of operation as appropriate for non-emergency construction and maintenance, trash collection, and parking lot sweeper activity near noise sensitive land uses.

Traffic:

Heavily loaded incoming and outgoing trucks will travel the roads parallel to Interstate Highway 15 on the west and east sides, with corresponding engine emissions and dust released from the cargo. The communities along these roads will be impacted by this traffic and the service life of the roads will be significantly affected. Tractor trailers and other heavy vehicles cause road wear far greater than passenger vehicles.

The submitted "Preliminary Traffic Assessment" documents submitted by the applicant for this project does not appear to be a final report – hence the name "preliminary" in the title. Additionally, it is dated May 6, 2013, more than six years ago.

On page four of the report it states, "*Daily traffic counts collected on Mesa Rock Road in 2011 showed that the traffic increased by approximately 5% since 2008. Therefore a 5% growth factor was applied to the 2008 counts to account for growth in the region.*" In other words, this 2013 report relies on traffic counts from 2011, so the data used in the traffic assessment is actually eight years old and has not been

adjusted in any way to accommodate growth and increases in traffic volume in the intervening years.

The Minnesota Department of Transportation published a study that indicates heavily-laden trash trucks and semi-tractor-trailers are responsible for wear on roadways that is hundreds of times greater than ordinary passenger vehicles. (<https://www.lrrb.org/pdf/201432.pdf> page 9). North Centre City Parkway and Mesa Rock Road have little heavy truck traffic currently, but this site will cause a substantial increase in that type of vehicle use and wear on the roadway will accelerate. Repair costs of the roadways will not be borne by the applicant, but will be paid for by the taxpayers of the County. This wear factor is not mentioned in the traffic report, or any other report regarding the impact of this proposed site.

The traffic report also states on page 7, *"Trucks negotiating the westbound to northbound turn of the existing curve on the Mesa Road (sp.) would need to travel slightly over the asphalt berm on the side of the road to avoid travelling into the opposing lane of traffic. The project applicant will widen the road through the curve to allow large trucks to negotiate the westbound to northbound turn while staying within their lane."* When trucks travelling to and from this site are not able to use the existing roadway without construction activity to widen it, it's obvious this is not an appropriate location for a facility of this type. I would also be interested in knowing the specifics of any road construction being provided by the applicant. Will they be required to conform to any standards, or will the applicant be able to deposit some asphalt on the ground to "widen" the road and go about their business? Who will be responsible for the upkeep of this "improvement." Should it be a factor in a traffic collision, who will be held liable for any defects in the roadway surface as a result of the developer's "improvement?"

Production Levels: In the opinion of experienced business owners, this project is not economically viable with outgoing shipments of 2 truckloads/day considering the scope of land improvement and capital expenditure being undertaken, the facilities

needed for that level of productivity, and operating costs to include employee pay, benefits and taxes. Like the original justification for the project (Attachment H) I believe the applicant is purposely minimizing the impacts of this project. Only after approval and the start of operation will the true scope and impact be known – if anyone from County government is paying attention.

Fire:

There is a significant risk of fire in the area of this project. Several residents have had their fire insurance cancelled, some more than once as has happened to me. At the same time, recycling centers in Southern California appear to have a propensity for fire due to the nature of the product and the process of decomposition:

San Marcos Nov. 7, 2014 – Fire at San Marcos trash and recycling facility:
<https://www.nbcsandiego.com/news/local/Flames-Leap-from-Trash-Pile-at-San-Marcos-Waste-Facility-281994841.html>

Spring Valley, August 2, 2016 - Fire at recycling center
injures firefighter, damages home
<https://patch.com/california/lamesa/firefighter-injured-fire-spring-valley-recycling-center>

Lakeside, September 23, 2016 Fire at recycling center
<https://www.cbs8.com/article/news/explosion-sparks-fire-at-recycling-plant-in-lakeside/509-57239699-966c-426e-90a8-62d5abd105b5>

Ontario, October 21, 2016 Fire at recycling center
<https://www.cbsnews.com/news/recycling-plant-fire-in-ontario-southern-california-burns-out-of-control/>

El Cajon May 16, 2018, Recycling plant bursts into flames

<https://www.10news.com/news/recycling-plant-bursts-into-flames-in-el-cajon>

To the east of the site there is a 25% uphill grade, covered with heavy brush that is quite flammable. Fire at the project site during a Santa Ana wind condition could easily lead to a conflagration racing up the hills to the east and impacting the Emerald Heights housing development.

The applicant's own fire plan states:

*"Flammable Vegetation: most of the undeveloped portions of the site are covered with mixed chaparral which is typically dense and varies in height up to 10 feet. **This area is a Very High Fire Severity Zone per CAL FIRE mapping. Large quantities of native brush exist adjacent to the project site. This creates an extreme fire hazard (DSFPD Ord. 202-2003)**" (emphasis mine) this document also states that CAL FIRE provides wildfire protection to this site as a "State Responsibility Area"*

The Deer Springs Fire Protection District ordinances are no longer applicable. Deer Springs is now using the San Diego Consolidated Fire Code. The applicable section is 96.1.2808 which refers to the California Fire Code (Attachment C).

While I cannot speak to the applicability of each of the listed state law sections, at a minimum the requirements under Fire Code sections 2808 et seq. should be mentioned in the applicant's fire plan. These codes specifically cover the processing of green waste and the Fire District is responsible for their enforcement.

I believe a new fire service approval should be sought to address whether, and to what degree, each of these sections applies to this site, and to ensure plans and/or funds have been submitted as required, and there is adequate mention of the mandatory safety features in the documentation submitted to PDS.

- 2808.4 Security bond, irrevocable letter of credit or other approved form of financial assurance shall be required to be posted (minimum \$25,000 (up to \$100,000, amount set by "fire official") posted with the local fire department for reimbursement in case of fire

- 2808.5 requires operational and emergency plans be submitted to the fire department prior to operation. There is no indication in the materials available to us that this requirement was met

- 2808.7 Plan for rapid equipment operator emergency callback
- 2808.8 Incoming waste diversion plan
- 2808.12 Vegetation clearing procedures
- 2808.17 Fire extinguishers
- 2808.19 Fencing
- 2808.20 No smoking at facility

Minimally, a new letter from the Deer Springs Fire Protection District should be submitted that does not list the Deer Springs Fire Ordinance as a reference – primarily since that resource is no longer valid.

Also, there should be some mention of the slope immediately to the east of the project, and the impact of that geography on the risk of fire and the danger it poses to the surrounding neighborhoods/residential areas. As I write this, we have “red flag” conditions with strong Santa Ana winds. Given the “Very High Fire Severity Zone” designation, it would be wise to have some operational restrictions placed on the recycling center during red flag and other dangerous weather events.

The document provided by Deer Springs Fire appears to be a boilerplate product that did not apply any restrictions beyond those listed in the applicant’s “Short-Form Fire Protection Plan.” There was no mention of the inherent dangers of a plant of this type or the surrounding area.

Given the information provided to us, I don’t believe the General Plan Update Policies Mitigation Measures below were satisfied in the existing documentation, thus the CEQA 15183 exemption should not be valid for this project.

7.1.7.8 Issue 8: Wildland Fires Policy

LU-6.11: Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high hazard fire areas or other unmitigable hazardous areas.

Policy LU-11.2: Compatibility with Community Character. Require that commercial, office, and industrial development be located, scaled, and designed to be compatible with the unique character of the community.

Policy S-3.1:Defensible Development. Require development to be located, designed, and constructed to provide adequate defensibility and minimize the risk of structural loss and life safety resulting from wildland fires.

Policy S-3.2:Development in Hillsides and Canyons. Require development located near ridgelines, top of slopes, saddles, or other areas where the terrain or topography affect its susceptibility to wildfires to be located and designed to account for topography and reduce the increased risk from fires.

Policy S-3.3:Minimize Flammable Vegetation. Site and design development to minimize the likelihood of a wildfire spreading to structures by minimizing pockets, peninsulas, or islands of flammable vegetation within a development.

Policy S-3.6: Fire Protection Measures. Ensure that development located within fire threat areas implement measures that reduce the risk of structural and human loss due to wildfire.

Policy S-4.1: Fuel Management Programs. Support programs consistent with state law that require fuel management/modification within established defensible space boundaries and when strategic fuel modification is necessary outside of defensible space, balance fuel management needs to protect structures with the preservation of native vegetation and sensitive habitats.

Extension of Review Period: The 1,000 pages of information submitted by the applicant cannot be adequately reviewed by residents in the 45-day time period allowed by the Planning and Development department – the comment period is closing on October 28, 2019. We should have at least 90 days to examine the documentation and

fully understand the impacts on our neighborhoods. With few exceptions, the affected residents are not familiar with the construction process, terminologies, ordinances and laws affecting construction and development. These issues are complicated and once built, attempts to change or modify operations of this type are nearly impossible. Code enforcement of existing regulations is spotty at best and non-existent at worst. Residents must be able, to the best of their ability, understand the scope and impacts of the project and insist on the strongest mitigation measures allowed, or cancelling of this project.

Zoning: The rezoning of this property was initially acted upon by the Board of Supervisors on May 11, 2006, then finalized in 2011. A planning report (General Plan 2020: Non-Residential Land Usage and Study Area Update) provided guidance regarding zoning and other factors. It is clear from this document that the Board did not follow its own guidance.

From the Planning Report to the Board, page 4, *“Industrial uses, in contrast, should not be located at the center of a community but rather at the edge – close enough for convenient access but where impacts to residential neighborhoods are minimized.”*

Page 11 of the report (Attachment E) states under Industrial-Specific Planning Criteria, “2. Co-locate with like uses. To minimize impacts from industrial uses, new industrial uses should be located in proximity to existing industrial uses. New industrial districts should be created only after careful examination of the potential impacts to surrounding uses. High impact industrial uses, in particular, should be buffered with commercial or lighter industrial uses when located near residential areas.”

A brief examination of the local area map (Attachment F) shows there are no industrial uses of land within several miles of the proposed site, nor is there any buffer between the site and nearby residential areas. It is an “island” of industrial zoning in the unincorporated north inland region a few hundred feet from an incorporated city.

"3. Proximity or direct access to major roads. Industrial uses, particularly medium- to high-impact uses, need to be located where heavy trucks can access the site without impacts to surrounding neighborhoods and without requiring use of minor roads...

The proposed traffic pattern provided by the developer relies on heavy truck traffic on Mesa Rock Road. In fact, the report indicates that the roadway will have to be widened to accommodate the heavy trucks required for this project because the existing pavement is not wide enough to allow trucks to negotiate the 90-degree corner near the site without crossing over the center of the roadway, thus endangering oncoming vehicles. Please see Preliminary Traffic Assessment on page 6 of this document.

On page 12 of the report (Attachment G) it is noted that the County contracted with Economics Research Associates to prepare a needs analysis of the various types of land. In Table 2 it shows a "projected demand in acres" of 1,018 for industrial use. The existing General Plan indicated 5,676 acres for a surplus of 4,800 acres – there was no overriding need for industrial zoned properties in 2005.

The Clerk of the Board of Supervisors provided me with the Board package for the rezoning of several parcels of the County in 2005 – the parcels for this proposed site are among them.

IT SHOULD BE NOTED THE JUSTIFICATIONS LISTED BELOW WERE RELIED UPON BY THE BOARD TO APPROVE THE CHANGE OF ZONING TO HIGH-IMPACT INDUSTRIAL. AS THE READER WILL SEE, THEY ARE VASTLY DIFFERENT THAN WHAT IS BEING REPORTED IN THE DEVELOPER'S STUDIES.

Attachment H includes the justifications put forth by Arie de Jong's representative for the site, Dave Shipley. It notes on page 2 that both the Twin Oaks Valley Community Sponsor Group and the County's Planning Commission recommended this change in zoning not be approved.

The letter also refers to newspaper articles that purport to show San Diego will not meet its state mandated recycling goals without additional recycling centers like the

one proposed here. It referred to AB 939 which was laid the groundwork for CalRecycle and the reporting requirements placed on counties and municipalities. The latest County Integrated Waste Management Plan (2008) is discussed on pages 1 and 2 of this document and show there is no dire need as described in 2005 to justify the zoning of these parcels to high-impact industrial classification.

The letter also refers to the Economics Research Associates study from above. In a part of the study that was not made available to me, Mr. de Jong's representative states there is a 49-acre deficit of industrial zoned property in the Twin Oaks Valley Community Sponsor Group's area. Please recall this is offset by the 4,800 surplus acres in other portions of the County.

Mr. Shibley notes "specific merits" of the project. Number two mentions traffic mitigation - the interchange at Deer Springs/Mountain Meadow, "...will be vastly improved as projects in the pipeline in Mountain Meadow and the Twin Oaks Valley areas are approved." This has not happened.

Number six, "No noise concerns..." This has been proven false by Mr. de Jong's own acoustical study which indicated noise above maximum level without considering the worst-case scenario of all equipment and vehicles operating at the same time.

Number seven, "...just high enough and north of the Escondido air basin to lessen odor effects." It appears the odor of green waste recycling was not discussed in the technical studies submitted by Mr. de Jong.

Number nine, "Minimal grading to prepare the site...The only other grading of significance will be improving the existing access road." In fact, Hilltop Group now estimates it will take 132 days of blasting to remove 244,464 cubic yards of material – about 1800 tons per day during construction.

It should also be noted that the plans described above were abandoned when the requested rezoning was delayed until 2011. A proposal to build a nursery on this site was submitted to PDS in 2008-2009. Only after the rezoning was completed in 2011 were the nursery plans scrapped and the recycling center plans restarted.

At the Hidden Meadows community group meeting on October 24, 2019, Mr. de Jong's representative, Carl Gailey of Hilltop Group, said that the community "resisted" the nursery project. Given that a rather large nursery (Moon Valley) is operating less than one mile from this site, I find that claim rather specious. A nursery would be a great addition to the area and, although Hilltop Group has deeply concerned and offended the neighbors with the recycling plant proposal, a nursery would have widespread support.

I believe the County was incorrect in its re-zoning of these parcels; this appears to be a case of "spot zoning." Spot zoning is often described as "the process of singling out a small parcel of land for a use classification totally different from that of the surrounding area for the benefit of the owner of such property and to the detriment of other owners."¹

From: **Foothill Communities Coalition v. County of Orange (2014) 222 Cal.App.4th 1302**

"The `rezoning of property, even a single parcel, is generally considered to be a quasi-legislative act "thus subject to review under ordinary mandamus." The standard for review of a quasi-legislative act is whether the action was "arbitrary or capricious or totally lacking in evidentiary support."

That is an apt description for what has happened with the North County Environmental Resources Project. It was arbitrarily assigned an industrial classification with very little evidence of need; it appears a single letter from someone paid by the developer. The parcels are limited to "recycling" development – an acknowledgement that, absent that minimal justification, industrial activity should not occur in this location.

Michigan State University identified four criteria to indicate spot zoning
https://www.canr.msu.edu/news/how_to_spot_a_spot_zoning

¹ Anderson's American Law of Zoning, 4th Edition, § 5.12 (1995)

1. The area is small compared to districts surrounding the parcel in question.

The accompanying parcel map indicates this is the case. Three parcels, all owned by the same organization, are the only changed areas.

2. The new district allows land uses inconsistent with those allowed in the vicinity.

Businesses in the vicinity include a convenience store, nursery, outdoor furniture store and a winery. Planned development includes a self-storage yard and an RV park. There is no industrial activity within miles of the proposed site.

3. The spot zone would confer a special benefit on the individual property owner not commonly enjoyed by the owners of similar property.

The type of facility planned for this site cannot be constructed anywhere nearby. The only person who stands to benefit from its existence is the applicant. While he will earn money from the operation, the residents will endure the increased noise, aesthetic issues, air quality degradation, increased traffic and the road wear issues from more large trucks. Residents who have waste they may wish to recycle will not be able to do so at this site because it will not accept material from the public. It is, quite literally, a blight on the neighborhood that confers no benefit to the residents of the surrounding area.

4. The existence of the spot zone conflicts with the policies in the text of the master plan and the future land use map.

From the County of San Diego Land Use Element

GOAL LU-16 Appropriately Sited Waste Management Facilities. Solid waste management facilities that are appropriately located and sited in a manner that minimizes environmental impacts and potential conflicts from incompatible land uses, while facilitating recycling and resource recovery activities.

Policies

LU-16.1 Location of Waste Management Facilities. Site new solid waste management facilities identified in the San Diego County Integrated Waste

Management Plan, in a manner that minimizes environmental impacts and prevents groundwater degradation, and in accordance with applicable local land use policies.

LU-16.2 Integrity of Waste Management Facilities. Avoid encroachment of incompatible land uses upon solid waste facilities in order to minimize or avoid potential conflicts.

<https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/GP/LandUseElement.pdf>

San Diego County General Plan

CHAPTER 3 LAND USE ELEMENT

COUNTY OF SAN DIEGO GENERAL PLAN 3-16

***“High-Impact Industrial** - This designation provides for freestanding industrial development in areas with access to key transportation corridors at a maximum FAR of 0.35. Typical uses within this designation are similar to those of the Medium Impact Industrial designation and include: manufacturing, processing, and assembly; warehousing and distribution; large equipment supply and sales; and other industrial and commercial activities that are generally incompatible with dissimilar adjacent land uses. However, the off-site impacts of industrial uses in this designation are likely to be more significant due to process, product, and reliance on outdoor operations or storage of process materials and product. Therefore, this designation may be incompatible with most Village areas and must be thoughtfully applied in any location in the unincorporated area. In certain limited circumstances it may be designated near the periphery of Village areas where the industrial use is isolated from residential and commercial designations and all allowed uses are adequately screened and buffered to eliminate unacceptable off-site impacts. Secondary support uses are also allowed in this designation, including related business and industrial services.”*

<https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/GP/LandUseElement.pdf> Page 16 on the web or 3-16 in hard copy

*From the **San Diego County Zoning Ordinance Summary** at*

<https://www.sandiegocounty.gov/pds/zoning/formfields/PDS-444.pdf> Page 4:

"M54 – General Impact Industrial. Allows unenclosed commercial and industrial operations having potential nuisance characteristics such as construction sales and services"

From the County of San Diego Use Regulations found at:

<https://www.sandiegocounty.gov/content/dam/sdc/pds/zoning/z2000.pdf>

Page 11-14

"M54 GENERAL IMPACT INDUSTRIAL USE REGULATIONS 2540 INTENT.

The provisions of Section 2540 through Section 2549, inclusive, shall be known as the M54 General Impact Industrial Use Regulations. The M54 Use Regulations are intended to create and preserve areas where manufacturing and industrial uses not having high nuisance characteristics may locate."

"M54 Use Regulations would be applied near rail and trucking facilities, or other locations where impacts associated with noise, odor and traffic would not impact on residential or commercial areas."

Full Environmental Impact Report: Our concerns will be covered more thoroughly if the applicant is forced to produce a full Environmental Impact Report about the project. The County determined the full report was necessary in 2015 (Attachment A). The applicant is attempting to use the California Environmental Quality Act (CEQA) process to provide minimal information in an attempt to satisfy existing County environmental standards.

Given the potential impact of the project on the surrounding area, a full Environmental Impact Report should be required. What are the "worst case" scenario consequences in terms of environmental impacts? What will 174 tons of daily production do in comparison to the submitted numbers, levels and estimates found in the applicant's reports? Finally, I don't believe this project should qualify for 15183 exemption from a full Environmental Impact Report due to the reasons outlined above.

I believe these policies and plans make it clear that the North County Environmental Resources facility is not in keeping with the rural nature of the surrounding area, nor is it compliant with the County's own strategic plan, rules, goals and standards in land use, or the General Plan Update. Its rezoning to industrial use was done arbitrarily in conflict with the recommendations of the Twin Oaks Valley Community Sponsor Group and the City of Escondido. Your own PDS did not recommend this zoning change, yet it still happened. The project should not move forward in its current state and the zoning for these parcels should be modified for uses more compatible and harmonious with the surrounding rural residential character of the area. Failure to do so will guarantee continued strife and concern from homeowners. Without a zoning change, yet another incompatible project will take its place in the future.

Sincerely,



Todd E. Frank
25677 Rue de Lac
Escondido, CA 92026
tfranksh@gmail.com

Attachment
A



County of San Diego

MARK WARDLAW
DIRECTOR
PHONE (858) 694-2962
FAX (858) 694-2555

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
www.sdcountry.ca.gov/pds

DARREN GRETHER
ASSISTANT DIRECTOR
PHONE (858) 694-2962
FAX (858) 694-2555

March 11, 2014

Hilltop Group, Inc.
Attn: Rick Gittings
807 East Mission Road
San Marcos, CA 92029

RE: **REQUEST TO PROCESS WITH A MITIGATED NEGATIVE DECLARATION FOR NORTH COUNTY ENVIRONMENTAL RESOURCES**, PDS2008-3500-08-015

Dear Mr. Gittings;

Planning & Development Services (PDS) is providing you with this written correspondence in response to your request to process a Mitigated Negative Declaration (MND) along with a more detailed project description and technical studies received on February 11, 2014. The request received explained how it may be possible to mitigate certain environmental impacts to less than significant and the description of the project was refined by providing more detail on the proposed project. The technical studies submitted with the request and detailed project description were not reviewed with this submittal.

In response to the submittal, PDS thoroughly reviewed your request to process your Site Plan with a Mitigated Negative Declaration (MND) and concluded that an Environmental Impact Report (EIR) is still required to address the project as currently proposed. The reasons for this determination are, but not limited to, the following:

- **Scale of Project:** The revised project description details that the project would cover 8 acres, with approximately 6 acres of outdoor recycling, a 12,000 square foot building for offices and associated operations, and 2 outbound truck trips a day with no specified limits for materials brought to the site daily. The scale of an 8-acre outside recycling facility surrounded by rural residential uses is large enough to meet the threshold to require an EIR.
- **Outside Agencies' Concerns:** The Air Pollution Control District (APCD) and the City of Escondido have submitted letters of concern and have requested an EIR.
- **Neighboring Property Owners' Concerns:** Several neighboring property owners have raised concerns over numerous environmental impacts, including community character, and have requested the preparation of an EIR. The significance of community character impacts can be subjective and courts have required EIRs on similar previous projects.
- **Precedence:** In 2012 and 2013 there were 3 similar facilities approved in California. Two of these projects utilized a MND and one an EIR. The first MND project was entirely indoors and the other was on an existing landfill. The only approved project, such as your project, that was a stand-alone and outside facility required an EIR.

- Significant Impacts: The County's independent evaluation of the project concludes an EIR is required based on the project's possible significant impacts in various issue areas; including aesthetics, biology, greenhouse gas emissions, traffic, hazards, water quality, air quality and noise.

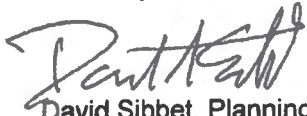
The combination of the above 5 reasons have lead PDS staff to determine that an EIR is still required for the North County Environmental Resources Site Plan. In order to proceed with the processing of your application, the following two options are available:

1. Reduce the project description and have staff reevaluate if an EIR is still required, or
2. Process an EIR.

If you do not select one of the above options, PDS requests that you formally withdraw your application. Please carefully consider each of these options and respond back to staff with your preferred option no later than April 11, 2014.

If you have any further questions, please contact me at (858) 694-3091 or by email at david.sibbet@sdcounty.ca.gov.

Sincerely,



David Sibbet, Planning Manager
Project Planning Division

cc: File

email cc:

glarson@hilltopgroupinc.com

rgittings@hilltopgroupinc.com

karlg@hilltopgroupinc.com

beth.ehsan@sdcounty.ca.gov Beth Ehsan, Project Manager

bredlitz@escondido.org, Escondido Planning Dept

whsox@cox.net

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Attachment
B



County of San Diego

MARK WARDLAW
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
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www.sdcountry.ca.gov/pds

KATHLEEN FLANNERY
ASSISTANT DIRECTOR

PUBLIC DISCLOSURE NOTICE INTENT TO ADOPT FINDINGS PURSUANT TO SECTION 15183 OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

September 12, 2019

NOTICE IS HEREBY GIVEN that the County of San Diego intends to adopt findings in accordance with the California Environmental Quality Act Section 15183 for the following project(s). The proposed findings and the associated analysis can be reviewed at http://www.sdcountry.ca.gov/pds/ceqa_public_review.html, at Planning & Development Services (PDS), Project Processing Counter and 5510 Overland Ave, Suite 110, San Diego, California 92123. Under this process, public review is not required however any comments received will be accepted and taken into consideration. A Frequently Asked Questions (FAQ) sheet on the 15183 CEQA exemption process can be located at <http://www.sdcountry.ca.gov/pds/zoning/formfields/PDS-202.pdf>. Comments on these findings must be sent to the PDS address listed above and should reference the project number and name.

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN I-15 REVIEW, S.O: PDS2008-3500-08-015, LOG NO. PDS2008-3910-0808012. The North County Environmental Resources project proposes a recycling facility for wood chipping and Construction, Demolition, and Inert (CDI) debris recycling facility on located on six parcels totaling to approximately 139 gross acres. The project components include a 12,000-sqaure foot steel building, 100,000-gallon water tank, and a security trailer. The project is located along Mesa Rock Road in the North County Metro Community Planning area, within the unincorporated San Diego County. The site is subject to the Semi-Rural Regional Category and the Land Use Designation is 18, High Impact Industrial. The Zoning Use Regulation for the site is General Impact Industrial (M54). The project is consistent with the General Plan and Zoning Ordinance.

The project is located west of Interstate 15 (I-15) along Mesa Rock Road. Access to the site is currently provided from a full access driveway approximately 400 feet north of where Mesa Rock Road curves east and intersects with Centre City Parkway. The project will be served by an onsite septic system and water from Vallecitos Water District. Earthwork will consist of cut of 96,710 cubic yards and fill of 182,430 for a net import of 72,360 cubic yards.

Comments of the proposed findings and associated analysis must be received no later than October 14, 2019 at 4:00 pm (a 30 day public disclosure notice period). A public meeting will be held at 6:30 pm on September 24, 2019 at the San Marcos Community Services Department, Dining Room Hall, located at 3 Civic Center Drive, San Marcos, CA 92069.

For additional information, please contact David Sibbet at (858) 694-3091 or at David.Sibbet@sdcounty.ca.gov

Attachment
C

SEC. 96.1.2808. STORAGE AND PROCESSING OF WOOD CHIPS, HOGGED MATERIAL, FINES, COMPOST, SOLID BIOMASS FEEDSTOCK AND RAW PRODUCT ASSOCIATED WITH YARD WASTE, AGRO-INDUSTRIAL AND RECYCLING FACILITIES.

Section 2808 of the California Fire Code is revised to read:

STORAGE AND PROCESSING OF WOOD CHIPS, HOGGED MATERIALS, FINES, COMPOST, SOLID BIOMASS FEEDSTOCK AND RAW PRODUCT ASSOCIATED WITH YARD WASTE, AGRO-INDUSTRIAL AND RECYCLING FACILITIES

Sec. 2808.1 General. *The storage and processing (mulching, composting) of wood chips, hogged materials, fines, compost, solid biomass feedstock and raw product produced from yard waste, debris and agro-industrial and recycling facilities shall be in accordance with section 2808.*

Sec. 2808.2 Definitions. *The following terms are defined in section 202:*
AERATED STATIC PILE. CHIPPING AND GRINDING. COMPOSTING OPERATION. GREENWASTE. HOGGED MATERIALS. MULCHING. STATIC PILE. WINDROW COMPOSTING PROCESS. WOOD CHIPS.

Sec. 2808.3 Permit required. *A permit shall be obtained from the fire code official prior to engaging in the operation and storing processed of wood chips, hogged material, fines, compost and raw product in association with yard waste and similar material recycling facilities. The permit shall be renewed on an annual basis or shall be limited to such period of time as designated by the fire code official. Permits shall not be*

transferable and any change in use, location, occupancy, operation or ownership shall require a new permit.

Sec. 2808.4 *Financial assurance for cost recovery. A security bond, irrevocable letter of credit or other approved form of financial assurance shall be required to be posted, in an amount determined by the fire code official. The financial assurance shall be a minimum of \$25,000.00 and a maximum of \$100,000.00, depending on the size of operation. The financial assurance shall reimburse the fire department for expenses incurred in any emergency response and/or enforcement action by the fire department to protect the public from fire or hazardous substances related to the operation. The financial assurance shall be returned to the operator in a timely fashion once the operation is closed, to the satisfaction of the fire code official.*

Sec. 2808.5 *Operational and emergency plans. The following operational and emergency action plans shall be submitted to and be approved by the fire code official prior to initiating an operation under section 2808:*

- 1. Operational Plan. The operational plan shall include: Site layout, pile dimensions, fire access, water supply, site security, site operations, temperature monitoring, rotation and diversion plan.*
- 2. Emergency Plan. The emergency plan shall include: Operator fire response actions, fire dispersal area, emergency equipment operator callback and initiation of incoming diversion plan. All plans shall define the equipment necessary to process and handle the materials.*

Sec. 2808.6 *Notification of fire department. The operator shall report all fires to the fire department immediately upon discovery.*

Sec. 2808.7 *Equipment operator emergency callback. The operator shall implement and maintain a plan for rapid equipment operator response to the site. The maximum response time to the site shall be within one hour of a fire department notification. The following equipment shall be on site and staffed with skilled operators: bulldozer, loaders and heavy duty equipment necessary to mitigate a fire. Notification procedure shall be maintained operational 24 hours a day, seven days a week. Notification may be by pager activation, telephone answering service, or other approved means.*

Sec. 2808.8 *Incoming waste diversion plan. The operator shall develop a diversion plan for incoming greenwaste for implementation in the event of equipment failure or other inability to process and distribute greenwaste. The plan shall prevent stockpiling of waste on the site and unauthorized depositing of waste on or near the site. The operator shall initiate the diversion plan based on criteria in the Operational and Emergency Plan without further direction from the fire department.*

Sec. 2808.9 *Unprocessable or non-green waste material. All green waste that cannot be processed on-site, such as stumps and fibrous plants, shall be immediately removed from the feedstock, stored in roll-off containers or bins and be removed from the facility on a weekly basis. All plastic bags shall be removed prior to shredding material.*

Sec. 2808.10 *Fire access roadway. A fire access roadway shall be provided to the site and on the site. Each roadway shall be at least 20*

feet wide, but the fire official may require a greater width, depending on site conditions. The operator shall also be required to obtain the fire code official's approval for the type of driving surface for the onsite access roadway.

Sec. 2808.11 *Storage sites. Storage sites shall be level and on solid ground or other approved all-weather surface. Sec. 2808.12 Combustible vegetation control. The operator shall clear any combustible material, weeds, brush, trees or other vegetation (including mulch) that is or may become, dry and capable of transmitting fire, from within 50 feet of raw green waste and mulch piles. Clearance shall be to bare earth or approved pavement. Individual growing trees within that distance may remain, subject to the fire code official's approval.*

Sec. 2808.13 *Pile separation. Piles shall be separated from adjacent piles and property lines by fire department access roadways.*

Sec. 2808.14 *Size of piles. Pile height, width and length shall be limited to criteria approved by the fire code official, based in part on the site material handling equipment. In no case shall a pile exceed 12 feet in height, 100 feet in width and 200 feet in length.*

Sec. 2808.15 *Static pile protection. Interior pile temperatures shall be monitored and recorded on a regular basis per the Operational Plan. Internal pile temperatures shall be taken at $\frac{3}{8}$ the pile height, 12 to 24 inches from the surface with a probe-type thermometer. Readings shall be made at not greater than 50-foot intervals along the length of the pile. Temperatures above 158° F are known to adversely affect microbial decomposition and are considered excessive. Infrared thermometers may be used to monitor for hot spots at the surface, but are not a*

substitute for internal probe measurement and documentation. Once windrows exceed 170° F, the windrows shall be reduced in size, be rotated and be monitored daily until temperatures drop below 158° F. All greenwaste stockpiles shall be re-mixed as necessary to alleviate any fire due to spontaneous combustion or temperatures above 170° F. Windrows shall be visually inspected on a regular basis. Once fires have been detected in any windrows at a site, this visual inspection shall be a minimum daily requirement. Daily inspections shall continue until the threat of fire no longer exists and the fire code official agrees inspections may be discontinued. All temperature and pile-handling records shall be kept on file at the site and be made available for inspection by fire department personnel. Data shall include date, time, temperature, specific location and person conducting measurement.

Sec. 2808.16 *Fire fighting water supplies and storage. Fire fighting water supplies shall conform to sections 2808.16.1 or 2808.16.2.*

Sec. 2808.16.1 *Public water supply. The operator shall provide and maintain approved fire hydrants and waterline mains as required by the fire code official. Water lines may be approved aboveground lines supplied from a reliable water supply with adequate protection against impact and fire flow reaction. Hydrant spacing shall be at 400-foot intervals along primary fire access roadways. Fire flow at each hydrant shall be at least 1000 gallons per minute at 20 psi. Duration of the required fire flow shall be as determined by the fire code official.*

Sec. 2808.16.2 *Private water supply. Above-ground water storage tanks may be installed when authorized by the fire code official*

where public water supply is not adequate to meet fire flow requirements. Volume and duration of the required fire flow shall be as determined by the fire code official.

Sec. 2808.17 *Material-handling equipment. Equipment used on all piles should be of a type that minimizes compaction. All vehicles operating on or around the piles shall have a Class A fire extinguisher of a minimum 2-A rating, in addition to the Class B rating appropriate for the vehicles. Approved material-handling equipment shall be available during fire fighting operations for moving wood chips, hogged material, compost and raw product produced from yard waste and wood fines.*

Sec. 2808.18 *General safety rules for site equipment maintenance. Welding or cutting torch operations shall be conducted a minimum of 30 feet from combustible materials. A fire watch shall be provided to detect fire, and to operate fire-extinguishing equipment throughout the welding or cutting operation and 30 minutes thereafter. Refueling and on-site maintenance shall meet California Fire Code requirements in Chapters 23 & 57 and all other applicable fire code requirements.*

Sec. 2808.19 *Site security. Pile storage areas shall be surrounded with approved fencing. Fences shall be a minimum of 6 feet in height.*

Sec. 2808.20 *Smoking and open burning prohibited. The operator shall prohibit smoking and open flame on the operational site, including smoking within vehicles. Approved signs shall be clearly and prominently posted, and shall be enforced by the site operators. No open burning shall be allowed on site.*

Attachment
D

SUBJECT: GENERAL PLAN 2020: NON-RESIDENTIAL LAND USES AND SPECIAL STUDY AREA UPDATE (District: All)

1

Non-Residential Land Uses

Commercial-Industrial Uses

The primary focus of this item is the commercial and industrial land use update. These uses are important to County residents because they provide business and employment opportunities as well as provide the goods and services needed for everyday life. To address this need, staff has developed recommendations based on demand projections as well as taking into account the economic development goals and local conditions of individual communities. In general, staff analysis shows that the County has sufficient land available for commercial and industrial land uses for the unincorporated area as a whole, for each of the unincorporated County subareas (Backcountry, North County, and East County), and for most of the individual Community Planning Areas.

In addition to ensuring adequate supply, the location of commercial-industrial designated land is equally important. Therefore, proposed new uses have been planned to be consistent with the GP2020 Community Development Model (see Figure 1) and a series of planning criteria is proposed to guide decision-making on land use map revisions. In brief, commercial uses should be in locations where they support the development of distinct communities and not be located on isolated parcels, in areas where they contribute to an excessive strip commercial condition, or where the expansion of commercial uses could threaten the viability of existing commercial districts. Industrial uses, in contrast, should not be located at the center of a community but rather at the edge – close enough for convenient access but where impacts to residential neighborhoods are minimized.

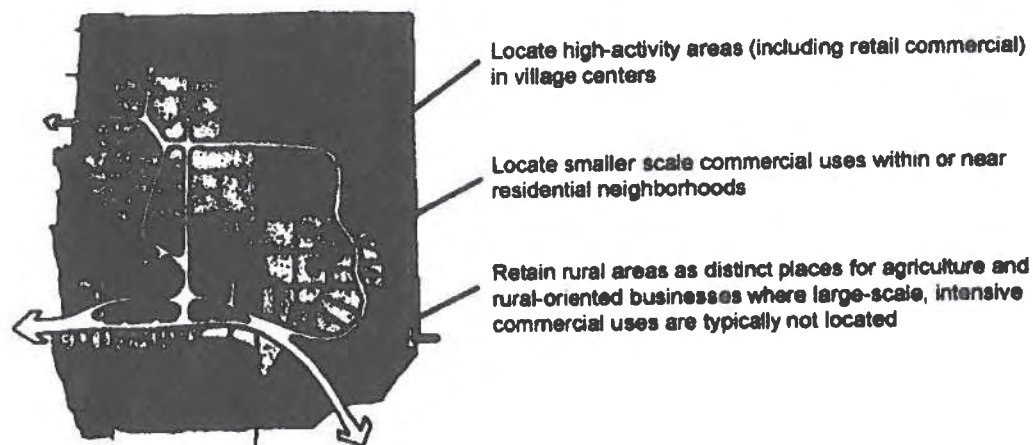


Figure 1 Community Development Model

Regional Land Use Pattern

In general, the highest intensities and largest acreages of commercial and industrial uses are located in the western portion of the unincorporated County, consistent with the residential land use pattern, and in those planning areas with large population bases (an exception is Borrego

Attachment
E

SUBJECT: GENERAL PLAN 2020: NON-RESIDENTIAL LAND USES AND SPECIAL STUDY AREA UPDATE (District: All)

1

4. **Protect viability of existing commercial areas.** The scale and location of new commercial uses should support and not detract from existing commercial areas. Although market competition or other forces may result in some closures of existing uses, new commercial areas should not create a substantial over-supply of commercial land or undermine existing commercial districts.

Industrial-Specific Planning Criteria

1. **Utilize large sites for industrial use.** Industrial use, particularly warehouse or manufacturing use, typically requires larger building footprints and large sites. Adequate land is also needed for screening and buffering with public roads and/or adjacent residential land. Large sites also help ensure the economic viability of industrial land, and industrial areas comprised mainly of small parcels substantially limit the development potential of sites designated for industrial use.
2. **Co-locate with like uses.** To minimize impacts from industrial uses, new industrial uses should be located in proximity to existing industrial uses. New industrial districts should be created only after careful examination of potential impacts to surrounding uses. High impact industrial uses, in particular, should be buffered with commercial or lighter industrial uses when located near residential areas.
3. **Proximity or direct access to major roads.** Industrial uses, particularly medium- to high-impact uses, need to be located where heavy trucks can access the site without impacts to surrounding neighborhoods and without requiring use of minor roads. Large-scale areas planned for light industrial uses also need direct access to major roads in order to provide access for employees and materials.

COMMERCIAL AND INDUSTRIAL MAP UPDATES

As part of the Commercial-Industrial update process, staff has worked with the Community Planning and Sponsor Groups, property owners, and other stakeholder groups to revise the Residential Baseline Map (Attachment B). The purpose of the map update is to identify the location and intensity of non-residential land uses. The map update process is described below. All staff recommendations, as well as property owner requests, Planning and Sponsor Group recommendations, and Planning Commission actions, are detailed in Attachment E: Community Summary, Map, and Matrix.

In brief, all recommendations are based on the GP2020 Land Use Framework and Planning Criteria defined in this report, along with the following information:

- **Needs Analysis:** Forecasts for commercial and industrial demand based on population forecasts for the Residential Baseline and Board Alternative maps.
- **Countywide Mapping Issues:** Technical and regulatory issues that emerged during the planning process.
- **Property Owner Requests:** Individual property owner requests for changes to commercial and industrial land uses.

Attachment
F

Attachment
G

SUBJECT: GENERAL PLAN 2020: NON-RESIDENTIAL LAND USES AND SPECIAL STUDY AREA UPDATE (District: All)

1

- **Community Outreach:** Community requests and preferences for commercial and industrial uses.

Needs Analysis

To ensure a sufficient supply of land is planned for future commercial, office, and industrial uses, the County retained Economics Research Associates (ERA) to prepare a "needs analysis". This analysis estimates the amount of commercial, office, and industrial space that can be supported by local residents and employees (based on future projections). It is important to note that this analysis is not the equivalent of a detailed market study or economic development strategy, but rather, a guide to the demand created for commercial and employment uses in each Community Planning or Sponsor Group Area. A description of the methodology used in this needs analysis is included in Attachment C: ERA Needs Analysis Methodology. The complete ERA needs analysis, including all report assumptions and the methodology, is available for download on the GP2020 website².

The results of the ERA needs analysis are summarized in Table 2. Additional information for each Community Planning and Sponsor Group Area is included in Attachment D: Summary Tables and Attachment E: Community Summary, Map, and Matrix. In general, the needs analysis shows that the unincorporated County has a surplus of land planned for commercial and industrial uses to meet its projected need.

Table 2: Comparison of Land Demand with Planned Acreage

	<i>Projected Demand in acres</i>	<i>Existing General Plan</i>		<i>Proposed General Plan (Baseline May 05)</i>	
		<i>Acres</i>	<i>Surplus/ (Deficit)</i>	<i>Acres</i>	<i>Surplus/ (Deficit)</i>
Commercial	1,398	3,484	2,086	4,283	2,885
Industrial	1,018	5,676	4,658	5,818	4,800
Office	364	365	1	307	(57)

Note: All numbers are in gross acres and are rounded to the nearest whole number.

Source: Economics Research Associates (ERA); County of San Diego

It is important to note that figures in Table 2 reflect a number of assumptions made by ERA, based on information such as past development trends, local consumer purchasing data, and countywide average standards of employment density. These assumptions are defined within the report. Also important to note is that the analysis includes all lands designated for commercial, office, or industrial use, whether or not the land is currently developed or may not be available for use within the planning period. For example, in Lakeside a large area designated for industrial use will not be available until excavation and reclamation efforts are completed. However, the figures do include conservative floor area and net-to-gross ratios to account for developable land lost to site constraints, public land exactions, and development inefficiencies. An adjusted ratio was used for Lakeside that accounts for greater constraint issues.

² <http://www.sdcounty.ca.gov/cnty/cntydepts/landuse/planning/GP2020-index.html>

DAVID R. SHIBLEY

1923 BEDFORD PLACE
 ESCONDIDO, CA. 92029
 E-MAIL: shibley1@cox.net

AND
 ASSOCIATES

OFFICE: (760) 737-9007
 FAX: (760) 737-9789
 CELL: (760) 443-5028

April 21, 2005

The Board of Supervisors
 County Administration Center
 1600 Pacific Highway, Room 335
 San Diego, California 92101

Re: Request to change residential zoning on 3 parcels of land in the North County Metro/Twin Oaks Sponsor Group area to heavy industrial as part of the General Plan 2020 Update at the Board of Supervisors Hearing scheduled for May 11, 2005. The parcels in question are 187-100-31, 35 & 37 totaling a gross acreage of 45.15 acres that should yield 25 to 30 acres of net usable acreage

Dear Supervisors:

I represent Arie de Jong and Mr. de Jong is requesting a zone change as part of the General Plan 2020 update to be heard before the Board of Supervisors on May 11, 2005 for 3 of 6 parcels he owns in the North County Metro/Twin Oaks Sponsor Group area just on the west side of I-15 and on the south curve of Mesa Rock Road as it passes under I-15. Refer to the attached Thomas Bros map for an exact location. The property is in the unincorporated area and contiguous to the City limits of Escondido. It only recently became available as of February 18, 2005 after the Escondido High School District turned it down as the site for a new high school.

Arie would like to change the zoning from residential/agriculture to heavy industrial. He owns 6 parcels for a total of 141 acres but is only requesting a zone change on 3 of the parcels. The property years ago was a farm home with an avocado grove and still has seven wells on site. Later it was used as a gravel pit and borrow site by CALTRANS during construction of the I-15 Freeway. CALTRANS left the furthest south 35 acres of the site in a deplorable condition with large cuts in the hillsides and black top, and debris scattered throughout the site. Refer to the photo with the close view of the 35 acres for confirmation of the condition of the site. After CALTRANS abandoned the site it was purposed as the site for a Recreational Water park named White Water. That was later abandoned and then the property was purchased by Arie de Jong.

OFFICIAL RECORD

Clerk of the Board of Supervisors

Exhibit No. 8 Agenda No. 1

Meeting Date 5/11/05 ()

Presented by _____

Document No. _____

THOMAS J. PASTUSZKA
 Clerk of the Board of Supervisors

If the rezoning is successful Arie intends to build a construction materials recycling facility for concrete, asphalt, wood and all other recyclable materials produced at construction sites. He will also build a large green waste composting facility. The green waste facility will be a more than adequate replacement for the largest green waste facility in the County currently located near Brown Field and scheduled for closure within less than six months. At completion of grading the southerly 35 acres should have a net acreage yield of 23 to 30 acres allowing ample room for this combination facility. Notice that Arie's other 3 parcels (79 acres to the west and 6.87 and 6.14 acres to the north) will provide more than an adequate buffer for his proposed project.

On the 16th of February Arie de Jong and I appeared at the Twin Oaks Sponsor Group meeting and requested the zone change as part of the General Plan 2020 Update process. We also appeared at the Planning Commission hearings. We were denied by both the Sponsor Group and the Planning Commission. At the sponsor group meeting the Golden Door presented a relocation proposal for their facility to eventually relocate from adjacent to Deer Springs Road to the center top of the 400 acres they own. The Sponsor Group agreed to work with them on their proposal. I only bring this up to indicate that the relocation of the Golden Door facility to the top of their property will not be in conflict with Arie de Jong's rezoning as the de Jong parcels are far enough south and separated by ridgelines from the proposed Golden Door relocation.

Please refer to the attachment three newspaper articles and it will immediately become evident there is a need for this type of facility. The basis of the articles is Assembly Bill 939 which is a state law requiring all jurisdictions in the County to reduce reuse and recycle at least 50 percent of their trash stream placed in landfills or face fines of up to \$10,000 a day. Certain areas in the County are currently only at 44%. The articles talk of the City and County building a construction and demolition mixed recycling facility in Miramar. Mr. de Jong's facility would place this task in the hands of private enterprise, which is significant when you consider how limited public funds currently are. Even if the Miramar facility is constructed you will need a similar facility to service the North County Cities.

County Planning Staff hired a consultant named Economics Research Associates (ERA) to complete and submit a report estimating how much industrial employment lands the projected resident population would support under the General Plan 2020 Update. The report found a deficiency of 49 acres of Industrial land in the Twin Oaks Sponsor Group area. This project would help close that deficiency.

In addition you will find enclosed two letters from the office of State Assemblyman Mark Wyland. One is directed to the Planning Commission the other to Supervisor Bill Horn. The purpose of both letters is simply to make

everyone aware of the fact that in certain areas of the County the 50% landfill diversion required by Assembly Bill 939 is not being met.

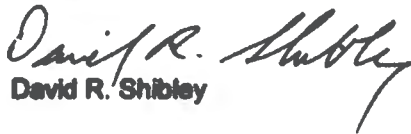
The specific merits of Mr. de Jong's site are as follows:

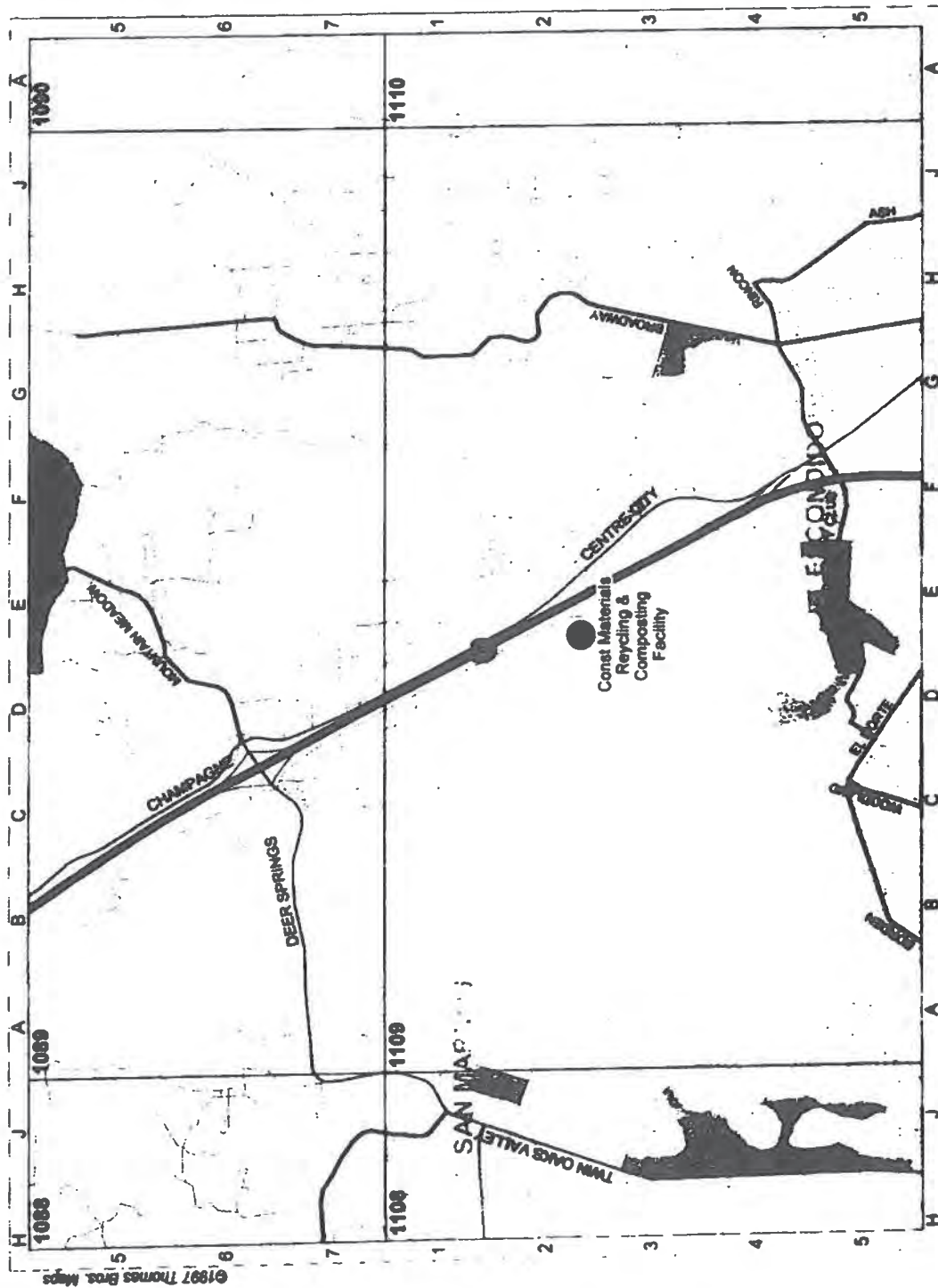
1. Central location to the North County Cities.
2. Located on a major transportation corridor (I-15) just south of the Deer Springs/Mt. Meadow Interchange. This interchange will be vastly improved as projects in the pipeline in Mountain Meadow and the Twin Oaks Valley areas are approved.
3. Located on Mesa Rock Road a sparsely trafficked frontage road providing access from the north and south.
4. Easy access from Escondido, San Marcos, Vista, Carlsbad, and Oceanside via route 78 direct to Center City Parkway and then north with a left hand turn on Mesa Rock Road underneath freeway 15 direct to the site.
5. Complete lack of visibility of the site from any direction as the south, north and west sides are high ridge lines completely hiding the site. The site sits high above the freeway and an east berm with trees will completely hide the east side of the project from homes 1.5 to 2 miles to the east across the freeway.
6. No noise concerns because of the ridge lines on all three sides, the masking sound of the freeway on the east side, lack of residential neighbors and Mr. de Jong's buffering created by three other parcels of land he owns contiguous to the west and north.
7. Isolated enough to prevent odor problems and located just high enough and north of the Escondido air basin to lessen odor effects.
8. Relatively benign environmental site as a minimal amount of coastal sage habit on the 35 acres was destroyed many years ago by CALTRANS when the freeway was built.
9. Minimal grading to prepare the site as the 35 acres was partially graded by CALTRANS years ago. The only other grading of significance will be improving the existing access road.
10. A site that could be fast tracked and brought on line quickly and addresses a County wide problem.
11. Helps satisfy a 49 acre industrial lands shortage in the Twin Oaks Valley area.

I and/or Arle de Jong are available if you would like to tour the site prior to the hearing of May 11, 2005. I can be reached at (760) 737-9007. If you have questions of County Staff I would suggest you contact Wayne Williams of the Solid Waste Division at (858) 874-4108 as he has seen the site and is the Counties resident expert on trash.

As a summary of the merits, this is a perfect site for this facility because of central location, easy transportation access, isolation, complete lack of visibility and minimal environmental impact. I cannot think of a more perfect location. Recycling at this facility will lengthen the life of all of our landfills, allow us to recycle our man made products and our green waste, and help us meet the Industrial Land deficiency currently existing in the Twin Oaks Valley area.

Sincerely,


David R. Shibley



● Const Materials Recycling & Composting Facility Page & Grid 1109 E2







Legend
 Hatched
 40 ft. or less
 Hatched



1 inch equals 600 ft.

Vicinity M:

THIS MAP IS THE PROPERTY OF THE
 GOVERNMENT OF THE UNITED STATES OF AMERICA
 AND IS NOT TO BE REPRODUCED OR TRANSMITTED IN ANY FORM OR BY ANY MEANS
 WITHOUT PERMISSION OF THE SECRETARY OF THE ARMY

STATE CAPITAL
P.O. BOX 60000
SACRAMENTO, CA 95830-0074
(916) 227-3074
FAX (916) 227-3074
□ DISTRICT OFFICE
201 EAST MAIN STREET
SUITE 200
VICTA, CA 92084
(714) 991-7070
FAX (714) 991-7000

Assembly California Legislature

ASSEMBLYMEMBER, SEVENTY-FOURTH DISTRICT

COMMITTEE ASSIGNMENTS
VICE CHAIR:
REVENUE AND VALUATION
MEMBER:
EDUCATION
GOVERNMENT ORGANIZATION
VETERANS AFFAIRS
BUSINESS & PROFESSIONS
SELECT COMMITTEES:
EARTHQUAKE SAFETY
AND PREPAREDNESS
HIGH PRIORITY SCHOOLS
WORKFORCE INVESTMENT
GASOLINE COMPETITION
MARKETING & PRICING
JOINT COMMITTEES:
DEVELOP A MASTER PLAN
FOR EDUCATION

March 3, 2005

County of San Diego Planning Commission Members
Attn: Cheryl Jones, Planning Commission Secretary
5201 Ruffin Road, Suite B
San Diego, California 92129

Re: Compliance with California State Assembly Bill 939

Dear Planning Commission Members:

On Friday the 18th of February 2005 Mr. Aris de Jong accompanied by David Shibley visited my office and presented information on what appears to be an excellent site for construction of a combination construction material recycling facility and green waste composting facility.

Placement of this facility would require a zone change from residential to heavy industrial and the opportune time to accomplish this zone change would be as part of the General Plan 2020 update currently in process.

As an assemblyman I do not ordinarily get involved in specific projects or land use decisions; however I simply want to make each of you aware of the state mandated requirements of AB 939 and the fact that in certain areas of the County the fifty (50%) percent landfill diversion requirement is not being met.

Mr. de Jong seems to have a very suitable site in a central location and I simply request that you give his zone change request suitable consideration at your Planning Commission Hearing of March 4, 2005.

Sincerely,

Mark Wyland

MARK WYLAND
Assemblymember, 74th District

☐ STATE CAPITAL
 P.O. BOX 90000
 SACRAMENTO, CA 95830-0074
 (916) 227-0000
 FAX (916) 227-0174
☐ DISTRICT OFFICE
 301 EAST MAIN STREET
 SUITE 201
 VENTURA, CA 93141
 (805) 581-7070
 FAX (805) 581-7088

Assembly California Legislature

MARK WYLAND
ASSEMBLY MEMBER, SEVENTY-FOURTH DISTRICT

COMMITTEE ASSIGNMENTS
 VICE CHAIR:
 REVENUE AND TAXATION
 MEMBER:
 EDUCATION
 GOVERNMENT, ORGANIZATION
 VETERANS AFFAIRS
 BUSINESS & PROFESSIONS
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 GASOLINE COMPETITION,
 MARKETING & PRICING
JOINT COMMITTEE:
 DEVELOP A MASTER PLAN
 FOR EDUCATION

March 3, 2005

Supervisor Bill Horn
 1600 Pacific Highway, Room 335
 San Diego, California 92101

Re: Compliance with California State Assembly Bill 939

Dear Supervisor Horn:

On Friday the 18th of February 2005 Mr. Aris de Jong accompanied by David Shibley visited my office and presented information on what appears to be an excellent site for construction of a combination construction material recycling facility and green waste composting facility.

Placement of this facility would require a zone change from residential to heavy industrial and the opportune time to accomplish this zone change would be as part of the General Plan 2020 update currently in process.

As an assemblyman I do not ordinarily get involved in specific projects or land use decisions; however I am sure you are aware of the state mandated requirements of AB 939 and the fact that in certain areas of the County the fifty (50%) percent landfill diversion requirement is not being met.

Mr. de Jong seems to have a very suitable site in a central location and I would appreciate any assistance your good offices could provide him with his zone change request. I have also forwarded similar correspondence to each Planning Commission Member in preparation for a Planning Commission Hearing of March 4, 2005 concerning this zone change request.

Sincerely,


 MARK WYLAND
 Assemblymember, 74th District

Representing the communities of: Carlsbad, Del Mar, Encinitas, Escondido, San Marcos, Solana Beach, Vista and portions of Oceanside
 Printed on Recycled Paper



Wednesday, February 09, 2005

editor@sddt.com

http://www.sddt.com

Source Code: 2005020907

San Diego ordinance aims to raise amount of recycled material

By Ryan Moore, The Daily Transcript
Wednesday, February 9, 2005

Businesses, especially construction, could bear a greater share of San Diego County and city's recycling responsibility in the coming months. And tougher policy measures for residents aren't far behind. Both the county and city are currently working out the details of construction and demolition ordinances that proponents say would help San Diego meet and maintain state garbage mandates, avoid large fines and extend the life of its landfills.

As part of a state law, all jurisdictions in the county are under mandate to reduce, reuse and recycle at least 50 percent of its garbage or face fines of up to \$10,000 a day. San Diego was granted an exemption after failing to meet that standard in December and has until the end of this year before it could again face fines.

The state's most recent results, from 2002, show that San Diego recycles 44 percent of its waste.

"This is a real way to assure that not only will the jurisdictions get 50 percent recycling, but they're going to be able to maintain it," said Wayne Williams, recycling program coordinator for the county. "We've got a population explosion going on right now, and it's very important were recycling more and more tonnage all the time just to keep at 50 percent."

The City Council told city workers in December to draft a mandate for recycling construction debris, even though an advisory committee that included building interests had proposed a voluntary program. Williams said once the city was mandated, a number of other jurisdictions jumped on the bandwagon.

Williams, who is heading the ordinance draft plan for the county, said other cities like Chula Vista and Oceanside implemented mandatory recycling programs years ago, and have had successful results. He noted that the county and city's plan will be uniformly structured to those existing plans to make the transition easier and more efficient.

Some details of the county's plan, which are still subject to change, include making projects of 40,000 square feet or greater subject to the ordinance; the mechanism for financing would be either a bond or cash, and to make sure builders recycle, they would receive a prorated percentage of money back for the amount of waste they recycle.

Williams said the plan would probably be brought before the county board by the end of March, and it would be implemented in stages, although this is all subject to change.

According to Leah Bowder, deputy director for the city's Environmental Services Department, the city will probably be submitting a commodities plan to the council toward the end of the summer. The residential/commercial plan, which will impose similar recycling requirements for green-waste, was halted to work on the construction and demolition ordinance.

As for the construction and demolition ordinance plan, concerns are being raised by some businesses regarding the details — such as what materials will be subjected, and whether or not the city and county actually have the infrastructure to implement such a mandate.

"Our concern is that if they make this a mandatory requirement yet do not have the facilities to accommodate the debris what do we do," said Matt Adams, Building Industry Association representative. "It takes time to get facilities like that online."

Adams said his organization is also concerned with the fact that the city wants to implement the ordinance even though it is in the process of calculating its baseline results regarding whether they met the 50 percent standard. The BIA recognizes the importance of recycling, Adams said, but they want a fair and reasonable plan and are requesting that the city build a new facility before approving the ordinance.

According to Williams, the county and city have announced that they want to build a construction and demolition mixed recycling facility in Miramar, and that the request has already hit the streets and is being negotiated.

"We really don't want to put an impediment in any way on businesses," Williams said. "We have taken [builders'] suggestions into consideration completely. We're here to help serve the community and the economy, and by

.. working with [builders] we can come up with a good solution.'

Williams said a recycling program such as the one he is drafting is essential for extending the life of its three landfills. The city estimates that the Miramar landfill -- which primarily receives city waste -- would run out of room by 2012 at the current rate of about 9 million pounds a day.

Construction and demolition materials -- such as cement and lumber -- weigh a lot, making it an easy source of removing "tonnage" of waste, Williams said. In addition, materials like concrete can be grinded up and used as base material for roads, something he feels contractors will reap the benefits of.

Sibbet, David

From: Nancie Froning <froningn@yahoo.com>
Sent: Monday, October 28, 2019 1:53 PM
To: Sibbet, David
Subject: North County Environmental Resources, public comments
Attachments: planning letter.docx

David,

Attached is our letter, expressing concerns with this proposed project.

Nancie & Marc Froning
1530 Windsong Lane
Escondido, CA. 92026

CAUTION: This email originated from outside of the County network. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you are unsure, forward the email to spam.protection@sdcounty.ca.gov.

10-28-19

David Sibbet, Planning Manager- sent via email

County of San Diego-Planning and Development Services

5510 Overland Avenue, Suite 310

San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: pds2008-3500-08015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet,

I live at 1530 Windsong Lane, Escondido, CA. 92026 at the corner of Mesa Rock Road, which is ½ mile north of the proposed project.

I am submitting this letter during the public comment period. The County needs to require Hilltop Group Inc. to prepare an Environmental Impact report, as previously promised by your department in 2015. This is the only way this helps to protect the residents.

The presence of an industrial processing facility, largely surrounded by residential areas will be disruptive and have significant environmental consequences on residents, including:

1. Operating from 5am-7pm Monday-Saturday, contrary to General Plan Policy N-5.2. We won't be able to have our windows open with trucks rolling down Mesa Rock Road. The noise and dust these trucks will create. In addition, the applicant has admitted that there is no guarantee of trucks bringing in asbestos, mold, and other hazardous materials. Please protect the public.
2. Fire danger from rock crushing machines, mulch being stored, and trucks in and out. We are now only able to purchase Fire plans through the Fair Plan, due to the high fire risk in our area.
3. Noise and other repercussions from explosive blasting during construction & the operation of crushing and equipment on site. Are you going to guarantee that our slab foundations and swimming pools won't crack?
4. Particulate emissions from demolition and leveling on the mountain side as well as from the operation of crushing, grinding and material handling equipment, outdoors.
5. Excessive grading of the iconic hill, known as "Bear Rock".
6. There are currently insufficient staff of Code Enforcement Officers, for our area and this would require additional staffing.
7. The wind blows toward the 15 Freeway. The traffic will be churning up all the particles blown that way.

I ask that you share my concerns with Director Mark Wardlaw.

Sincerely,

Nancie Froning and Marc Froning

Sibbet, David

From: Andrea Fulenwider <afulenwider@hotmail.com>
Sent: Saturday, September 28, 2019 4:50 PM
To: Sibbet, David; Desmond, Jim; Wardlaw, Mark; Mills, Benjamin
Subject: North County Environmental Resources, Site Plan 1-15 Review,
S.O:PDS2008-3500-08-015, Log No. PDS2008-3910-080812

This letter is to inform you that my family is in opposition of having a Toxic Recycling Plant in our neighborhood.

There needs to be an Environmental impact Report for this project as required in 2015. There are several disruptive and negative impacts for local residents which include: health, production, noise, traffic, decreased property value, and high-impact industrial activity.

Please reconsider and do not issue this permit.

Sincerely,

Andrea Fulenwider
afulenwider@hotmail.com
10041 Tall Oak Drive
Escondido, Ca 92026

Sibbet, David

From: Mary Gouin <marygouin@cox.net>
Sent: Wednesday, September 25, 2019 3:29 PM
To: Sibbet, David
Cc: Neufeld, Darin; Slovick, Mark
Subject: Oppose Concrete Crushing Plant on Mesa Rock Road

Mr. David Sibbet,

We are greatly concerned about the Concrete Crushing Plant on Mesa Rock Road near Bear Rock on west side of I-15. We plead that you don't approve this project and have several concerns.

The dust emissions from these trucks and the raw materials they are hauling. The gas emissions for the use of heavy equipment including large/heavy trucks entering and leaving the facility. The noise from the operating of the machinery to crush, grind and screen and of course the noise of the heavy trucks.

This facility is in no way acceptable to operate in a residential location. This should **definitely not be approved** by the San Diego County.

Sincerely,

Robert and Mary Gouin

Jesmond Dene neighborhood Homeowner

Sibbet, David

From: John <mcpdjohn@sbcglobal.net>
Sent: Friday, October 04, 2019 3:30 PM
To: Sibbet, David
Subject: Proposed Recycling Plant on Mesa Rock Rd in Escondido

Dear Mr. Sibbet,

My name is John Grande, and I am a resident who lives several miles to the east of the proposed location of the subject plant. We moved here about 20 years ago, and selected this area very carefully because we wanted to live in peace in a quiet neighborhood. The cherished peace that we have enjoyed for two decades is about to be disrupted/ destroyed and you have the authority to grant or deny this proposal. In the morning, I can hear the cars on the 15 freeway at my house. And cars are not very loud. Can you imagine what life would be like here if you allow this plant to be constructed? Our fundamental right to live in peace will be violated. It is shocking to me that you would even consider doing this to the residents of north Escondido. Please do not let this happen. Not just to defend our right to live in peace, but also to mitigate the potential toxic emissions that would detrimentally affect our health. I would never approve such a project in a residential area. In your neighborhood, my neighborhood, or anyone else's neighborhood. I urge you to deny this request. Tell them to find a suitable location that is not in the backyard of thousands of Escondido residents. If you must entertain the possibility of approving this, please make sure they are required to submit a full Environmental Impact Report, and that the residents have ample time to review such a long document. Thank you for doing the right thing in this very serious matter.

Respectfully,
John L Grande
11586 Kaywood Lane
Escondido, CA. 92026

Phone

760-522-3155

Sent from my iPad

Sibbet, David

From: Susan Gula <susangula@gmail.com>
Sent: Thursday, October 03, 2019 3:08 PM
To: Mills, Benjamin; Wardlaw, Mark; Sibbet, David; Desmond, Jim
Subject: SUBJ: NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN I-15 REVIEW, S.O:
PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

I have been a resident of North County for over three decades and believe the above referenced recycling facility should not be approved by the County. Such a facility would have a negative impact upon the adjacent neighborhoods, the residents' health and quality of life.

At the very least, an Environmental Impact Report should be required to ensure the community's concerns are addressed.

Sincerely,
Helen Gula

Date: 10/24/2019

David Sibbet, Planning Manager

David.Sibbet@sdcounty.ca.gov

County of San Diego - Planning and Development Services

5510 Overland Avenue, Suite 310 San Diego,

CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500- 08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet,

I have lived in the Montreux Homes for over 15 years and in this community for over 25 years. We are about 1/3 of a mile away and at about the same elevation as the proposed facility. Montreux residents most certainly will be affected by the noise and air quality of this huge Construction and Demolition debris facility!! I am dishearten to hear that the members of my community and surrounding communities, especially the children, elderly and ill's health and well-being are clearly not being taken into consideration. There are residential homes, schools and senior facilities very close to this area. This will have a very negative impact for communities/residents **including** Montreux residents!!

I expect a full Environmental Impact Report for this project to be submitted. Not a less intensive evaluation for this project. Why would this important report whose outcome could affect people's health and lives be fast-tracked?

I am also concerned about illegal dumping and illegal emissions control. Who will protect us from that?

Having a facility on Mesa Rock Road will result in very specific negative effects to our area that **was not intended to be industrial in the spirit of the County Plan or the CEQA submitted.**

These include:

- Particulate emissions from demolition and leveling on mountain side as well as from operation of crushing and grinding and material handling equipment outdoors
- Noise from explosive blasting during construction phase and then the operation phase of crushing and associated equipment on site.
- Operating hours 5:00 AM till 7:00 PM, not meeting Policy N-5.2 of the General Plan
- Noise and dust from fully loaded trucks entering and leaving site through Mesa Rock Road, Center City Parkway and the Deer Spring overpass.
- Burden on the community of monitoring and reporting violations including gas **emissions**, noise, dust, or truck loads in and out. Monitoring equipment not included in project.
- Excessive grading of an iconic hill and rock known by residents with affection as Bear Rock.
- A facility to be perched on high level grade in view of over 6100 residents and all the commuters who pass through the area on Interstate 15.
- Recycling Centers propensity for fire. Our area is a fire zone!!

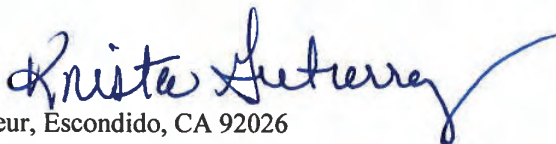
This new project will fundamentally transform the landscape of our community and change the appeal and reputation of this area and the health of our community. I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw.

I also request an extend time period of 90 days to review the hundreds of pages of information submitted by the applicant.

With Respect,

Krista Gutierrez

25128 Rue De Fleur, Escondido, CA 92026





Public Disclosure Notice
Public Comments
North County Environmental Resources
October 10, 2019

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
RE: NORTH COUNTY ENVIRONMENTAL RESOURCES, SO: PDS2008-3500-08-015, Log No: PDS2008-3910-0808012

Delivered via USPS October 10, 2019



Dear Mr. Sibbet:

We are writing to provide public comment on the above noted project and the subsequent Public Notice provided by the County of San Diego Planning & Development Services of their Intent to Adopt Findings Pursuant to Section 15183 of the CEQA, issued September 12, 2019. We would first like to note that we believe the County's 30 day notice period is completely inadequate to re-review the extensive documentation, environmental memo, County code and State policies applicable to this project. These are not simple matters and we believe all those impacted have a right to proper notice and adequate time to evaluate the County's position.

Project Background:

Per the provided project plan, the North County Environmental Resources project intends to operate on approximately 139 acres of property located just south of Mesa Rock Road, just west of the I-15 freeway, to include 6 adjacent parcels zoned M54, A70 and RR, in order to establish: "...a recycling facility for wood chipping, Construction, Demolition and Inert (CDI) debris...". To facilitate this discussion, the descriptions for these zones as we understand them have been provided for reference below [PDS-444 (Rev. 4/2017)]:

M54 – General Impact Industrial. Allows unenclosed commercial and industrial operations having potential nuisance characteristics such as construction sales and services.

A70 – Limited Agriculture. Intended for crop or animal agriculture. Number of animals allowed are specified by neighborhood regulations.

RR – Rural Residential. Family Residential uses permitted with Group Residential, limited packing and processing, and other uses allowed by Use Permit.

For further clarification, below is the specific guideline for applicable site zoning designations:

**M54 GENERAL IMPACT INDUSTRIAL USE REGULATIONS
2540 INTENT.**

The provisions of Section 2540 through Section 2549, inclusive, shall be known as the M54 General Impact Industrial Use Regulations. The M54 Use Regulations are intended to create and preserve areas where manufacturing and industrial uses not having high nuisance characteristics may locate. Non-industrial uses which support industrial uses are permitted within the zone, particularly administrative, sales, and services uses. Typically, the M54 Use Regulations would be applied near rail and trucking facilities, or other locations where impacts associated with noise, odor and traffic would not impact on residential or commercial areas. All outdoor storage areas would be subject to screening regulations in Section 6706. Various applications of the M54 Use Regulations with appropriate development designators can create a large transportation-



dependent industrial center or a small, geographically isolated grouping of a few small scale industrial uses.

In addition, the following describes the PERMITTED USES SUBJECT TO LIMITATIONS, which appears to be the regulation most applicable to the project description.

2543 PERMITTED USES SUBJECT TO LIMITATIONS.

The following use types are permitted by the M54 Use Regulations subject to the applicable provisions of Section 2980. The number in quotes following the use type refers to the subsection of Section 2980 which applies.

a. Commercial Use Types.

Adult Entertainment Establishments "19"

Agricultural Services "14"

Eating and Drinking Establishments "21"

Food and Beverage Retail Sales "10"

Recycling Collection Facility, Small or Large "2"

Recycling Processing Facility, Light or Heavy "3" (Italics added by CFSP)

Wholesaling, Storage and Distribution: Heavy "14"

Wholesaling, Storage and Distribution: Light "8"

Where "3" is defined as:

"3" Recycling Processing Facilities shall comply with the applicable provisions of Section 6975.

6975 RECYCLING PROCESSING FACILITY.

The Recycling Processing Facility Use Type (as defined at Section 1513) is a permitted use in the specified Use Regulations when conducted in accordance with the following:

a. Recycling Processing Facility, Light

1. In a Commercial or Industrial Use Regulation upon meeting the criteria set forth in this section commencing at subsection a.2. below;
2. All operations shall be conducted entirely within an enclosed building except as follows:
 - i. In the C37, C38 and C40 Commercial Use Regulations and the M54 and M58 Industrial Use Regulations, a light recycling processing facility may be conducted outside of buildings if the property on which the facility is located does not abut a property zoned or planned for residential use.



- ii. Notwithstanding the Enclosure Regulations, in any other Commercial or Industrial Use Regulation, a Minor Use Permit may be granted for an alternative type of enclosure such as a wall or view-obscuring fence not less than 8 feet in height and landscaped on all street frontages;
3. Power-driven processing shall be permitted, provided all requirements of the Performance Standards commencing at Section 6300 are met;
4. A light processing facility shall be no larger than 45,000 square feet and shall have no more than an average of 2 outbound truck shipments of material per day;
5. Setbacks and landscaping requirements shall be those required by the zone in which the facility is located;
6. All exterior storage of material shall be in sturdy containers or enclosures which are covered, secured, and maintained in good condition, or shall be baled or palletized. Storage containers for flammable material shall be constructed of non-flammable material. Oil storage must be in containers approved by the Local fire and/or Health Official. No storage, excluding truck trailers and overseas containers, shall be visible above the height of the fencing;
7. Site shall be maintained free of litter and any other undesirable materials, and shall be cleaned of loose debris on a daily basis and shall be secured from unauthorized entry and removal of materials when attendants are not present;
8. Space shall be provided on the site for the anticipated peak load of customers to circulate, park and deposit recyclable materials. If the facility is open to the public, space shall be provided for a minimum of 10 customers or the peak load, whichever is higher, except where the Director determines that allowing overflow traffic is compatible with surrounding businesses and public safety;
9. One parking space shall be provided for each commercial vehicle operated by the processing center.
10. Noise levels shall not exceed 60 dBA as measured at the property line of residentially zoned or occupied property, or otherwise shall not exceed the following:

70 dBA in any Commercial Use Regulation (Except C31)
55 dBA in the C31 Use Regulation
75 dBA in the M54 and M58 Use Regulations;



11. If the facility is located within 500 feet of property zoned or planned for residential use, it shall not be in operation between 7:00 p.m. and 7:00 a.m. The facility shall be attended by on-site personnel during the hours the facility is open;
12. Any containers provided for after-hours donation of recyclable materials shall be at least 50 feet from any property zoned or occupied for residential use; shall be of sturdy, rustproof construction; shall have sufficient capacity to accommodate materials collected; and shall be secure from unauthorized entry or removal of materials;
13. Donation areas shall be kept free of litter and any other undesirable material. The containers shall be clearly marked to identify the type of material that may be deposited. Facility shall display a notice stating that no material shall be left outside the recycling containers;
14. Signs shall comply with the On-Premise Sign Regulations. In addition, facility shall be clearly marked with the name and phone number of the facility operator and the hours of operation;
15. Air contaminants including but not limited to smoke, charred paper, dust, grime, carbon, noxious acids, fumes, gases, odors, or particulate matter, or any emissions that endanger human health, cause damage to vegetation or property or cause soiling, vibration or noise above levels allowed by the Performance Standards commencing at Section 6300, shall not be permitted.

b. Recycling Processing Facility, Heavy

1. In a C37, C38 or C40 Commercial Use Regulation or M54 or M58 Industrial Use Regulation upon meeting the criteria for a light recycling processing facility as set forth above in this section commencing at subsection a.2.;
2. In any other Commercial or Industrial Use Regulation upon the issuance of a Major Use Permit. The conditions of said Major Use Permit shall require compliance with the criteria for a light recycling processing facility as set forth above in this section commencing at subsection a.2. as well as any others necessary in order to make the findings required for the granting of a Major Use Permit.

A70:

2700 INTENT. The provisions of Section 2700 through Section 2709 inclusive, shall be known as the A70 Limited Agricultural Use Regulations. The A70 Use Regulations are intended to

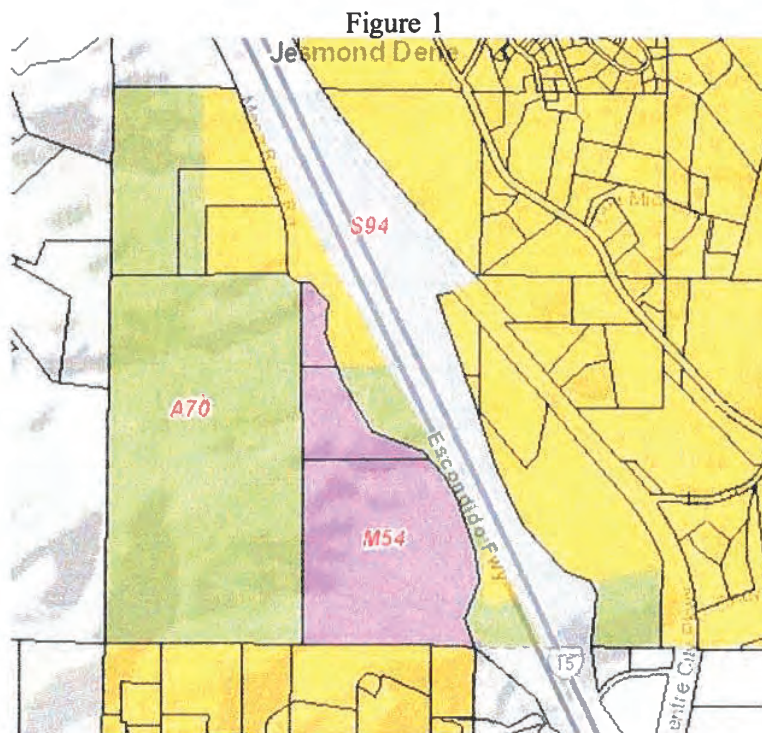


create and preserve areas intended primarily for agricultural crop production. Additionally, a limited number of small farm animals may be kept and agricultural products raised on the premises may be processed. Typically, the A70 Use Regulations would be applied to areas throughout the County to protect moderate to high quality agricultural land.

RR:

2180 INTENT. The provisions of Section 2180 through 2189, inclusive, shall be known as the RR Rural Residential Use Regulations. The RR Use Regulations are intended to create and enhance residential areas where agricultural use compatible with a dominant, permanent residential use is desired. Typically, the RR Use Regulations would be applied to rural or semi-rural areas where urban levels of service are not available and where large lots are desired. Various applications of the RR Use Regulations with appropriate development designators can create buffers between residential and agricultural uses, family or small farm areas, or large lot rural residential developments.

Figure 1 below provides a recent screen capture in ArcGIS of the proposed project site and corresponding zoning, with the green areas corresponding to the A70, yellow corresponding to the RR zone, and the purple section corresponding to the M54 zoning.





Discussion Regarding Applicability of 15183 Exemption and Project Impact Considerations:

The project eligibility criteria for the 15183 exemption is reiterated below (excerpts from FAQ - CEQA for 15183 Exemption):

Projects submitted with an Application for an Environmental Initial Study (PDS-367) will be automatically evaluated for eligibility by the assigned Planning & Development Services (PDS) project manager. In order to qualify for a CEQA 15183 exemption, the following findings must be made:

- 1. The project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.*
- 2. There are no project specific effects which are peculiar to the project or its site.*
- 3. There are no project specific impacts which the GPU EIR failed to analyze as significant effects.*
- 4. There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.*
- 5. There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.*

Based on this criteria and the description of planned use, we agree, for the most part, that this project is eligible for this exemption. While the overall Regional Category and Land Use Designation appear to be consistent with the GPU, we do want to point out that over 70% of the acreage in the proposed project lot designations are for uses other than those zoned for and approved for the planned activities. As identified above, only 3 of the 6 lots within the defined project area are zoned M54, and are appropriate for the project in question. It is our understanding, however, that the lots identified as A70 and RR will NOT be used to accommodate the processing facility, and instead will be modified to allow for traffic easements only. If this is the case, we do not believe the use of these lots in this manner introduces new impacts beyond what has already been identified in the GPU EIR.

One area that is a concern, however, is that the project plan indicates that the project will produce 48 tons of materials daily, and estimates that this translates to two truck-loads per day. According to regional transportation authorities, however, loads in this region are limited to ~33,000 pounds, or 17 tons. Given the allowed amount of material for recycling facilities under this zoning designation (see item 4. in regulation 6975 above), limits removals to 2 trucks per day, we believe that this amount should be adjusted accordingly. We believe that production volumes exceeding this amount will not remain consistent with the applicable zoning and would then necessitate an EIR to ensure the additional processing volumes and transport impact could be adequately evaluated. In addition, the project proposal indicates operating hours of 5:00 am to 7:00 pm, yet the operating hours for recycling facilities under item 11 of regulation 6975 is



limited to 7:00 am to 7:00 pm. Further, 6975 (under the Performance Requirements) restricts noise levels to 75 decibels given the projects proximity to residential zoning (residential housing is within 200 feet of the proposed project lot), and all recycling activities must take place within an enclosed area. While they seem pedantic, these very specific requirements ensure this project does not create disturbances, heavy industrial traffic and other unpleasant impacts on the surrounding residents, some of whom live, walk their pets and children, and host their evening barbecues immediately adjacent to the project in question.

The planning around this project also has additional confounding factors associated within the I-15 Corridor Review Board, which impose limitations on the nature and scope of the project to ensure the natural beauty of San Diego County's most conspicuous areas isn't obscured by unsightly activities. This includes restrictions around building heights, architecture, guidelines for ridgeline projects, and proper project landscaping for areas viewed from the I-15 freeway. Many of the Scenic Preservation Guidelines included in the I-15 Corridor Review Board's purview discourage the design elements called out in this project (eg. 36 foot metal buildings), and we would like assurances from the County and project sponsor that these items will be adequately addressed to ensure the aesthetic character of the region is maintained.

We think it is important that the County understand that the concerns we raise stem from our belief that neighbors in our region who adhere to zoning laws each play an important role in the assurance that our quality of life, health and property values are maintained, and we all rely on the County to prohibit uses (by anyone) that create congestion, contamination, or noisy, smelly, dusty and ugly neighbors in our front and back yards. This is a standard we are all expected to keep and hold one another to, and if we are to welcome North County Environmental Resources into our neighborhood, we fully expect them to comply to these standards, rules and regulations as well.

To reiterate our position and findings:

- 1) We believe the County should have provided a 90 day review period for the 15183 Exemption position.
- 2) Overall we are in agreement with the County's position, and agree that the project, when operated to code, is generally consistent with the GPU, with the following clarifications:
 - a) The County must ensure that the sponsor adhere to all performance requirements for the designated zoning, as outlined in 6975, to include:
 - i. a limit of no more than two truck-loads per day of processed materials (an increase would exceed zoning allowances and would necessitate a new EIR)
 - ii. operating hours between 7:00 am and 7:00 pm
 - iii. all processing must occur in an enclosed area, and established noise levels and pollutants must be maintained in accordance with 6975



Public Disclosure Notice
Public Comments
North County Environmental Resources
October 10, 2019

- b) The County must ensure that the sponsor adhere to all requirements outlined by the I-15 Corridor Review Board

We kindly thank you for your time and commitment to ensuring our North County Neighborhood retains its tranquil beauty and rural character.

Sincerely,
Dawn Haake
Community Advocate
Citizens for Smart Planning
Escondido, CA

Sibbet, David

From: hamer007@cox.net
Sent: Saturday, September 28, 2019 7:01 PM
To: Sibbet, David
Subject: Debris Recycling Center Escondido

Thank you for allowing us to comment. I won't go into details since many others have. I just want to go on record as OPPOSING the Debris Recycling Center in Escondido. I see no way in which it benefits the immediate community and I'm certain there are better locations such as the Otay Mesa location discussed at the townhall meeting. Thank you...Bob Hamer, Escondido

Sakdarak, Souphalak

From: Sibbet, David
Sent: Monday, December 09, 2019 7:56 AM
To: Neufeld, Darin
Cc: Sakdarak, Souphalak
Subject: FW: Hidden Meadows Motion on North County Environmental Resources

See below

From: James Chagala <jchagala@hotmail.com>
Sent: Friday, December 6, 2019 10:04 AM
To: Sibbet, David <David.Sibbet@sdcounty.ca.gov>
Subject: Hidden Meadows Motion on North County Environmental Resources

David,

On October 24, 2019 the Hidden Meadows Sponsor Group heard PDS2019 3500-08-015 and passed the following motion 5-0.

"Recommend denial of the project due to the necessary material for a fully informed decision not being available. The Group would like to re-evaluate the project if an environmental Impact Report can be provided, or at a minimum if, updated Acoustical Analysis, Air quality and Greenhouse Memorandum, Biological Assessment Report, Fire Protection Plan, and Traffic Assessment can be provided."

Jim Chagala

James Chagala & Associates

555 West Country Club Drive, #254

Escondido, CA 92026

760-751-2691

Sibbet, David

From: Georgeann Higgins <georgeann101@verizon.net>
Sent: Tuesday, October 08, 2019 3:24 PM
To: Sibbet, David
Cc: Wardlaw, Mark; Jimenez, Ann; Potter, Andrew
Subject: NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008-3500-08-015, LOG NO. PDS2008-3910-0808012

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

My husband and I attended the meeting on Sept 26, 2019, and we were astounded at the County's attempt to rush the recycling plant through, especially under the 15183 exemption. We know that pushing this through without an EIR and on a minimal use basis easily opens the door for expansion later on, especially, with minimum oversight and the inability of the residents (victims) to have a multimillion dollar facility like this removed after the damage is done. Anyone with an ounce of business sense knows that you don't spend millions of dollars developing a business like this for it to operate on the least possible productive conditions.

We are additionally concerned about the affects on our health and noise, especially for the people directly east who will get the brunt of their operation from the prevailing wind.

We live in Deer Springs Oaks, and our only entrance/exit to and from the park is on Mesa Rock. With an intersection to the north 100 ft away and a blind curve in the road to the south 100 ft away, we currently have trouble getting in and out of our park. Increased traffic, especially 18-wheel trucks going by, is not going to help our living conditions which are already threatened by the proposed changes of the interchange by Caltrans and the Newland development.

In addition, it's a shame to destroy that mountain. We are losing the semi-rural environment that balances out the density of many impacted areas of our County.

The County seems intent on packing as many people and businesses into every open space possible, which only leads to inflation, stress and ill health. There are already five recycling plants in the County. We don't need another blight added to our environment, but we do need the County to protect us, and not put us in danger of our health, accidents and additional stress.

Georgeann Higgins
1299-21 Deer Springs Road

San Marcos, CA 92069

Sibbet, David

From: Michael Ibach <michael@hm-lawyers.com>
Sent: Wednesday, October 23, 2019 3:18 PM
To: Sibbet, David
Cc: 'Ben-Thomas Hamilton'; michelle@hm-lawyers.com
Subject: North County Environmental Resources Project
Attachments: Tekstra Project Letter.pdf

Mr. Sibbet,

Please see the attached letter in opposition of the North County Environmental Resources Project, a hard copy to follow. I appreciate your time and consideration. Please let me know if you have any questions or comments on the matter.

Best Regards,

Michael Ibach, Esq.
HAMILTON & ASSOCIATES, APC
3110 Camino del Rio South, Suite 203
San Diego, California 92108
Tel: (619) 299-4877
Fax: (619) 299-4787
Direct: (619) 299-9012

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CALIFORNIA

San Diego County
Orange County
Riverside/San Bernardino
Los Angeles

HAMILTON & ASSOCIATES, APC
ATTORNEYS AT LAW

3110 CAMINO DEL RIO SOUTH, SUITE 203
SAN DIEGO, CALIFORNIA 92108
Telephone: (619) 299-4877
Facsimile: (619) 299-4787

OF COUNSEL:

DONALD E. McINNIS

Sender's E-mail:
michael@hm-lawyers.com

October 23, 2019

Via U.S. Mail & Email: David.Sibbet@sdcounty.ca.gov

David Sibbet, Planning Manager
COUNTY OF SAN DIEGO - PLANNING AND DEVELOPMENT SERVICES
5510 Overland Avenue, Suite 310
San Diego, California 92123

Re: North County Environmental Resources Project

Dear Mr. Sibbet:

Please be advised this office represents Susan Tekstra, a long time resident of Escondido, California and an individual who is vehemently opposed to the North County Environmental Resources project's proposed recycling facility ("the Project"). Ms. Tekstra is a member of the Montreaux subdivision. Please allow this letter to serve as Ms. Tekstra's official opposition to the Project.

Initial Proposal

In or around July of 2013, a proposal for the same recycling plant at issue was being contemplated by the County. County officials agreed to thoroughly study how the industrial recycling plant would affect nearby traffic, air quality and wildlife. This process is called an Environmental Impact Report.

The report had been lobbied for by hundreds of residents, all of whom signed a petition opposing the Project. The residents contended that the Project would harm their property values, worsen traffic on the I-15, damage the rural scenery and simply pose health risks to the residents. Thankfully, at that time, the County appeared to take these concerns seriously in ordering the Environmental Impact Report. The report was to be submitted by May of 2015. After the County decided to require the report, it did not appear that a report was submitted by the developers hoping to build the Project.

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David Sibbet
October 23, 2019
Page 2

Present Proposal

Astonishingly, after roughly six years, the County has apparently reneged on its requirement that an Environmental Impact Report be performed. Residents received a letter from the County on September 12, 2019 which cited Environmental Quality Act Section 15183 and indicated that the project had been determined to qualify for an exemption and no longer needed to have an Environmental Impact Report performed. This was despite the extensive public outcry regarding the Project years ago and its reliance on the County to protect them.

Residents were not told what happened to change the County's decision in regard to the Environmental Impact Report. They were not told who made this decision nor what was considered. Residents were notified of the change and were given an extraordinarily short notice of 12 days to attend a meeting regarding the change. The residents, and specifically Ms. Tekstra, feel as if the County has simply abandoned their well-being and decided that the concerns of residents are subordinate to the County's financial agenda. As all have known for years, the Project proposes issues involving health, noise, aesthetics and traffic. This does not even include potential additional environmental concerns that could come to light should a thorough study be done.

Health Impact

Ms. Tekstra suffers from a condition called neurosarcoidosis, which results in the development of brain tumors. This requires frequent chemotherapy, leaving her immune system weakened and significantly compromised. As a result, airborne particles and toxins are extremely detrimental to Ms. Tekstra's lung health and overall well-being.

Unfortunately, the proposed Project has potentially severe negative health consequences due to decreased air quality and a lack of emissions monitoring. The crushing of concrete and the handling operations on the facility are particularly worrisome. These can lead to the emission of silica dust and other particulates, all of which severely impact not only Ms. Tekstra's health, but the community in general.

In regard to emissions, there is a concerning lack of appropriate monitoring and specificity. The project scope is vague regarding the rate at which processing equipment will operate, which has a significant bearing on the emissions coming from the plant.

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David Sibbet
October 23, 2019
Page 3

The theme here, and the fact that we can all agree on, is that there are significant unknowns in regard to the Project. There is no reason why the previously recommended Environmental Impact Report should not be undertaken. In fact, the only explanation is that the County is skipping steps and saving money, allowing the developer to do the same, and placing these interests above the health and well-being of its residents. I cannot imagine this is a position the County would continue to take on behalf of its citizens and constituents.

Noise

The hours of operation for the Project are 5:00 a.m. to 7:00 p.m., 6 days a week. These hours are outside the normal hours of businesses in the area and will only lead to the disruption of residents' normal routines. Resident will be forced to have their lives disrupted by the constant and unrelenting noise coming from trucks, concrete crushing, and other disruptive machinery. Of note, this disruption will not simply be taking place while residents are at work, but will be occurring on the weekends, in the mornings and at night. Resident will not be able to step outside and enjoy themselves without being disturbed by the noise being emitted from the Project. Further, it does not appear that the County considered the amphitheater like shape of the area, which may only serve in amplifying the noise levels.

Traffic & Aesthetics

Heavily loaded incoming and outgoing trucks will be traveling, routinely, along the I-15, to and from the facility. The communities residing along these roads will be severely impacted by this increase in traffic, as the trucks are likely to cause a substantial increase in traffic. Further, the trucks themselves will only serve in more rapidly deteriorating the surrounding roads as heavy trucks and/or trailers cause wear and tear on roadways that is hundreds of times more significant than ordinary passenger vehicles.

In addition to the increase in traffic, the facility is set to be perched on a high level grade, in view of over 6,100 residents. Instead of looking out into their backyards and seeing a beautiful rural area, residents will be forced to see this unwanted facility. They will be forced to see and hear trucks, buildings and other elements of the facility. Simply put, this project robs the County's residents of the views and aesthetics that they paid for, currently enjoy and have an expectation of enjoying into the future.

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David Sibbet
October 23, 2019
Page 4

Conclusion

While Ms. Tekstra is under no delusion that the area around her will forever go unchanged, she simply asks that the County at least conduct its due diligence and heed the concerns of its residents. There is simply no reason to not require an Environmental Impact Report when the interests of your residents could be so adversely affected.

Performing such a report would not only allow the County to obtain all the facts and information required in order to make an informed decision, but would serve in putting its residents at ease. This would restore residents' trust in the County and assuage any fears that the County is placing financial incentives or other concerns above that of its residents' well-being. The right thing to do here is clear.

Should you have any questions or concerns regarding the above, please do not hesitate to contact me. Thank you for your careful consideration of this matter.

Very truly yours,

HAMILTON & ASSOCIATES, APC



Michael W. Ibach

MWI

Enclosure

3-765

HAMILTON & ASSOCIATES, APC
ATTORNEYS AT LAW

SERVING SOUTHERN
CALIFORNIA

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Orange County
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SAN DIEGO, CALIFORNIA 92108
Telephone: (619) 299-4877
Facsimile: (619) 299-4787

OF COUNSEL:

DONALD E. McINNIS

Sender's E-mail:
michael@hm-lawyers.com

October 23, 2019

Via U.S. Mail & Email: David.Sibbet@sdcounty.ca.gov

David Sibbet, Planning Manager
COUNTY OF SAN DIEGO - PLANNING AND DEVELOPMENT SERVICES
5510 Overland Avenue, Suite 310
San Diego, California 92123

Re: North County Environmental Resources Project

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Residents were not told what happened to change the County's decision in regard to the Environmental Impact Report. They were not told who made this decision nor what was considered. Residents were notified of the change and were given an extraordinarily short notice of 12 days to attend a meeting regarding the change. The residents, and specifically Ms. Tekstra, feel as if the County has simply abandoned their well-being and decided that the concerns of residents are subordinate to the County's financial agenda. As all have known for years, the Project proposes issues involving health, noise, aesthetics and traffic. This does not even include potential additional environmental concerns that could come to light should a thorough study be done.

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David Sibbet
October 23, 2019
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David Sibbet
October 23, 2019
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Should you have any questions or concerns regarding the above, please do not hesitate to contact me. Thank you for your careful consideration of this matter.

Very truly yours,

HAMILTON & ASSOCIATES, APC



Michael W. Ibach

MWI

Enclosure

Sibbet, David

From: Jagadeesan <jagadeesan@cox.net>
Sent: Saturday, September 28, 2019 10:46 AM
To: Sibbet, David
Subject: toxic recycling plant

This is terrible. I sure don't want to live in a place where I have to worry about toxic waste harming my family's health. This is a nice peaceful neighborhood and I don't want any noisy trucks taking that away. This is definitely not acceptable

Sibbet, David

From: Jimenez, Ann
Sent: Thursday, October 10, 2019 8:58 AM
To: Sibbet, David
Subject: FW: NCER Facility SD North County

Hello David,

I believe this is for you, please let me know if it is not.

Thank you,

Ann Jimenez
PLANNING COMMISSION SECRETARY
COUNTY OF SAN DIEGO, PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SAN DIEGO, CA 92123
O: (858) 694-3816

From: Milo Jensen <milokjensen@gmail.com>
Sent: Thursday, October 10, 2019 6:25 AM
To: Wardlaw, Mark <Mark.Wardlaw@sdcounty.ca.gov>; Jimenez, Ann <Ann.Jimenez@sdcounty.ca.gov>; Potter, Andrew <Andrew.Potter@sdcounty.ca.gov>
Subject: NCER Facility SD North County

I oppose this proposed facility in our community. Traffic in this transportation corridor is already at capacity. The freeway on ramp at Deer Springs and Mountain Meadow road is already full of trucking use (many illegally parked along the on ramp southbound 15). This intersection of traffic is already at capacity with a large proportion of it being commercial trucking. Do not allow our community to become a dumping ground for more commercial activity creating more traffic, noise, dust, and pollution.

Milo Jensen
10440 Meadow Glen Way E, Escondido, CA 92026
619-694-8538

Sibbet, David

From: Rupen K <rupen8888@gmail.com>
Sent: Wednesday, October 16, 2019 6:04 PM
To: Sibbet, David; vmbroughton@cox.net
Subject: 7.45acre site straddling Noth Nutmeg Street, North Center City Pkwy

CAUTION: This email originated from outside of the County network. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you are unsure, forward the email to spam.protection@sdcounty.ca.gov.

Hi David

I am concerned for proposed development of recycling facility on
SUB 18-0005 and ENV 18-0005

I reside on Rockhoff Rd which is overlooks the site.

We bought our home about 2 years back considering the nature around, quietness and future to retire at the same location and not have worry to move. We and all the neighbours are very much concern for this recycling plant. Most of the neighbours on Rockhoff are seniors and retired seniors.

There will be noise pollution, extra insurance cost to us due to high fire area due to the plant, air pollution, huge truck traffic plus our property values degraded.

Currently the new development on the country club golf course is having continuous noise pollution even at 5.48pm as I am writing this letter to you.

This area you have proposed rezoned is in a secluded quiet neighborhood. All the people like me in their late 30 and 40's are moving in for nature and tranquility and plan to retire in the same place who want country life and close to city. I request you to not allow this rezoned. Please do or advice the needful to stop the recycling plant and keep it residencial.

Looking forward to hear from you along with your guidance.
Appreciate your help and cooperation in this matter.

Sincerely,

Rupen.
ph 310-702-7595

County of San Diego
Planning and Development Services
5510 Overland Ave. Suite 310
San Diego, CA 92123

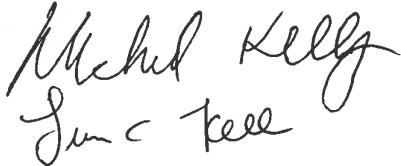
September 23, 2019

RE: S.O. PDS2008-3500-08-015
Log No. PDS 2008-3910-0808012

Dear Sirs:

We live within two miles of the proposed construction materials recycling plant. We are asking that you not approve the project proposed for Mesa Rock Road in Escondido. Our concerns are the increased traffic of semi-trailer trucks, the increase in dust and particulates, the noise and finally the vibration this project will cause. We feel there are better places for the location of this project that would be further away from residential areas.

Thank you for your consideration.

A handwritten signature in black ink that reads "Michael Kelly". Below the signature, the words "Linda & Kelly" are written in a similar cursive style.

Linda and Michael Kelly

Sibbet, David

From: Kennedy, Tim (IHG) <Tim.Kennedy@ihg.com>
Sent: Monday, October 14, 2019 2:22 PM
To: Sibbet, David
Subject: RE Project: PDS2008-3500-08-015; PDS 2008-3910-0808012
Attachments: Kennedy personal letter.pdf

David:

Please see my attached letter opposing the approval of the North County project along Mesa Rock Road

Location: The project is located west of Interstate 15 (I-15) along Mesa Rock Road in the Twin Oaks Community Plan Area.

[NORTH COUNTY ENVIRONMENTAL RESOURCES; PDS2008-3500-08-015; PDS2013-BC-13-0019; PDSXXXX-HLP-XXX; LOG NO. PDS2008-3910-0808012](#)

Tim Kennedy

Email: tim.kennedy@ihg.com

Resident county of San Diego

2956 Rue Montreux, Escondido, CA 92026-8712

Office Tel: (760) 294-8611 Mobile: (713) 443-5882

10/14/2019

David Sibbet, Planning Manager via email to David.Sibbet@sdcounty.ca.gov
Director, Mark Wardlaw
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

RE Project: PDS2008-3500-08-015; PDS 2008-3910-0808012

Dear David,

This narrative will implore you to reassess and disapprove the pending above aforementioned project regarding the installation of a high impact industrial recycling plant proposed to be placed directly in the middle of several rural and semi-rural surrounding residential neighborhoods located in an extremely dangerous fire area. Just the reference to "high impact industrial", extreme fire danger, semi-rural and residential would put this matter into context as out of place and inappropriate for the location and situation.

Please evaluate and consider the following special circumstances in order to fully assess the potential dangerous, harmful and unwarranted conditions that may ensue should this project continue.

Extenuating, special and significant circumstances:

- A high impact industrial activity, with greater than normal accidental fire events as a result of operations, is located less than ½ mile from surrounding residential neighborhoods, and located in a semi-rural, extremely hazardous fire area, exposing the surrounding residential neighborhoods to the unnecessary fear and threat of wildfire danger.
- Direct line-of-site exposure to offending noise, harmful pollutants and particulates projecting into the surrounding neighborhoods exposing the residents to undue health, and adverse life value implications. Please see below the errors in the applicant's visual report dated Dec 2014. **Exhibit 1 below.**
- Errors to the applicant's **NEGATIVE CULTURAL RESOURCES SURVEY REPORT (Dudek)**; The report fails to call out the famous "Bear Rock" located on the top of the mountain directly connected to the hill that will need blasting and grading. No mention of this iconic rock or the disturbance of it was discussed. The report does state no tribal organizations were contacted. This error should be noted and tribal organizations should be contacted to find out the significance of this iconic rock where neighborhood streets to the south call out names such as Bear Rock Glen. See **Exhibit 2** below and the cultural resources survey report. In addition, your own report **SUMMARY OF DETERMINATIONS AND MITIGATION WITHIN THE FINAL ENVIRONMENTAL IMPACT REPORT**, calls out potentially significant impact on scenic vistas, scenic resources, visual character and Light or glare.
- As noted in the **Air Quality and Greenhouse Gases Memorandum (Dudek)Report**; Page 15 of the report disqualifies counting particulates because the total being diverted from other facilities to this facility. The report does not address that this diverted material with prevailing winds will blow directly toward 6700 residential homes and 6 schools when the existing

concrete crushing facilities are not near rural residential. This is a serious error in calculations. The topography approximately 1/2 mile due east, encompasses a boxed or dead-end canyon (Reidy creek), consisting of these 6,700 residences and numerous schools, where there is no substantial exhaust or exit for a continuous incursion of offending odor and air-borne particulate matter. As a personal matter I suffer from asthma and these emissions will be harmful to my health as well as the Country Club Elderly home just 1/2 mile from the facility.

- Water use and run off noted in the **Stormwater Quality Management Plan and the Hydrology/Drainage study** appear to my layman's eye not to be suitable. Both reports reference a regular commercial parking lot drainage with regular stormwater drainage basin and a septic proposed to be very modest. These do not take into consideration the heavy water use of the concrete crusher and particulate dust sprayers that are explained in the Air Quality report. One map in this report on page 25 of drainage plan even **notes "Temporary Concrete Crusher," rather than the proposed permanent one.** Didn't the preparer know that it was a permanent daily used piece of equipment? These reports do not address this heavy water use or the particulates that will poison the groundwater. My concern is water used to crush concrete and keep dust down will be from unknown locations laced with poisons such as asbestos and other cancer causing agents. This poison water will percolate year after year and flow to the East off the hill into the valley of Escondido rural residential areas.

Although with an outdated and "streamlined" environmental review performed 10 years ago that may have complied at a cursory level regarding density, zoning, and the general plan, it will be determined with an updated EIR and a detailed study and analysis of special and significant circumstances, that this project will in fact have several specific and significant impacts and effects which have not been analyzed and are peculiar to the project or its site.

Additionally, it will be provided that the project will in fact have a substantial off-site and cumulative impact to the surrounding residential neighborhoods and schools that have not been disclosed or evaluated due to inadequate assessment by the GPU and the outdated EIR.

Regardless of the state mandates, this project should be individually re-assessed, and issues identified as special and extenuating circumstances. Please embrace and assess these disclosures in your decision to not approve the pending process and development of this project.

Timothy Kennedy

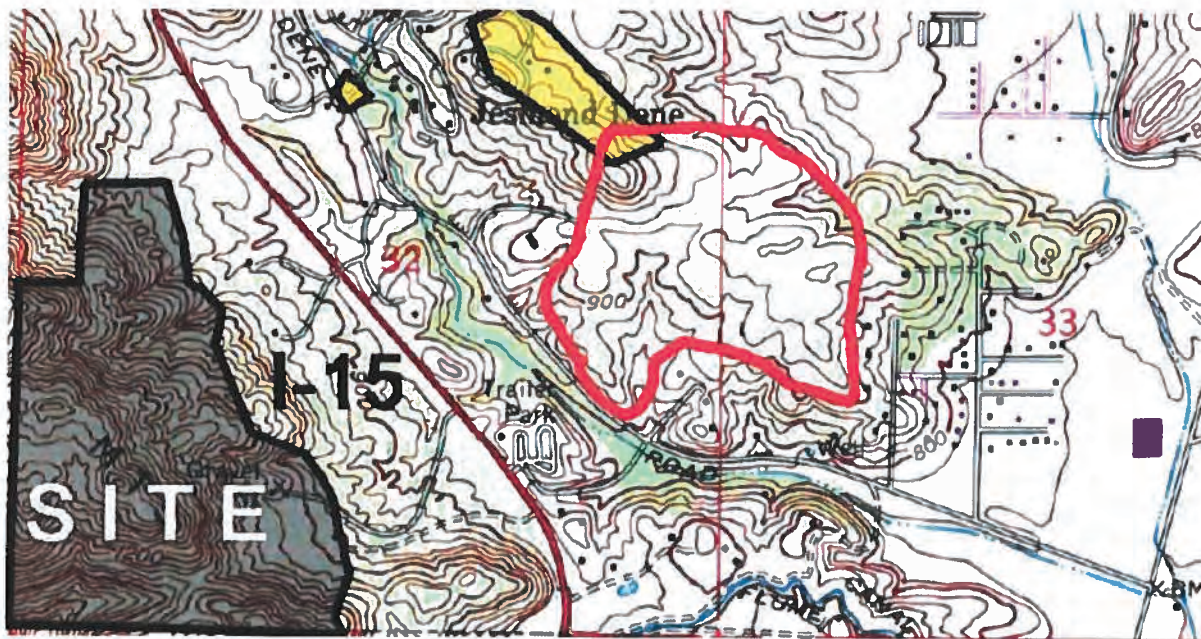


Resident 1/2 mile from project (**Exhibit 3 below**)
2956 Rue Montreux
Escondido, CA 92016
Cell 713-443-5882

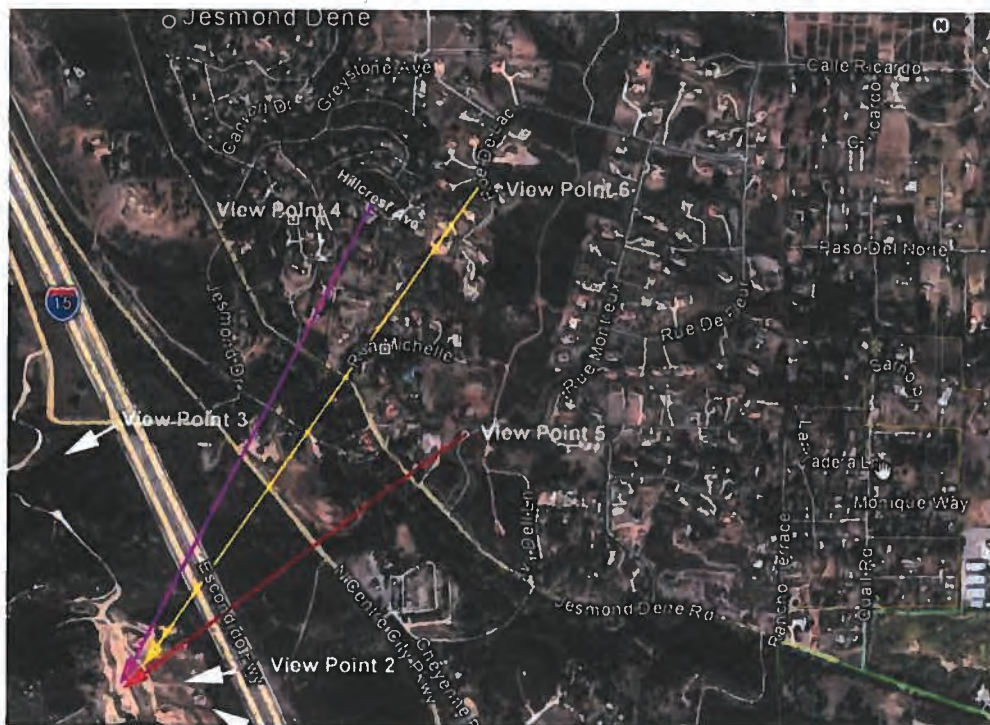
Exhibit 1

Applicant Visual Impact Appendix B: Dec 2014:

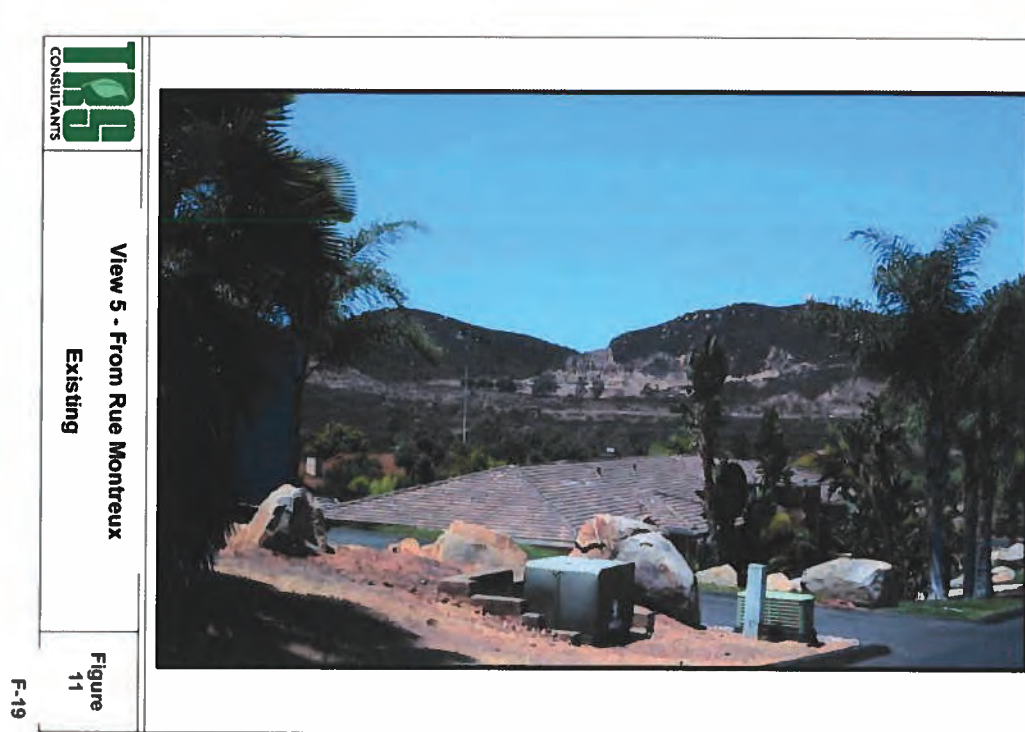
Pg 32, Viewshed area in yellow **has missed the inclusion of homes located in Montreux.** It appears to be an old map where the Montreux neighborhood has not been built because the typical home dots do not appear.



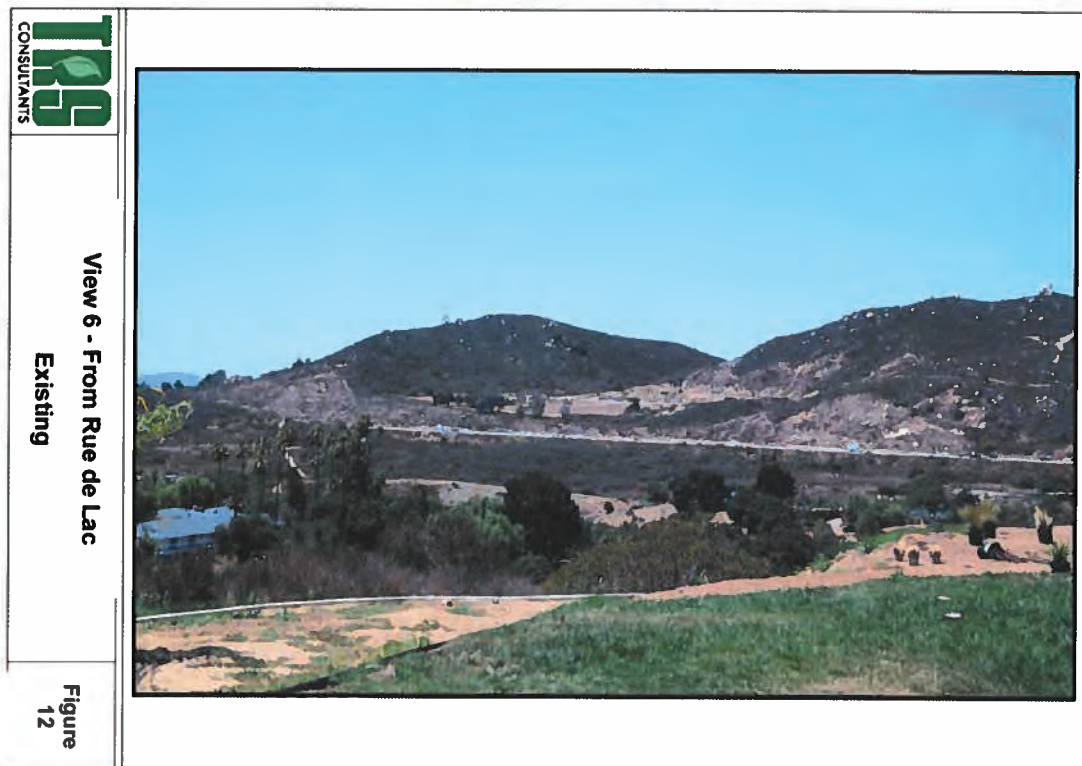
Page 36: View Point 5 gate of Montreux and View point 6 highest home on Rue De Lac does admit view.
Photo cropped from report to show same location as above noted view points



Page 36: Notes view from Montreux Gate but **in fact this is not a picture of the gate area.**
Montreux gate is much closer on the West Side closer to the project from the power lines in the picture.



Page51: View from Montreux Rue De Lac. Obviously, photo shopped to show much further than actual



Overall Conclusion of Visual Appendix is that it has many errors and does not show the true visual impact. In actuality, visual impact is significant destroying the iconic beauty of one of the first unique rocky hills surrounding the Escondido valley. This hill also includes the iconic BEAR ROCK.

Extenuating, special and significant circumstances:

- A high impact industrial activity, with greater than normal accidental fire events as a result of operations, is located less than ½ mile from surrounding residential neighborhoods, and located in a semi-rural, extremely hazardous fire area, exposing the surrounding residential neighborhoods to the unnecessary fear and threat of wildfire danger.
- Direct line-of-site exposure to offending noise, harmful pollutants and particulates projecting into the surrounding neighborhoods exposing the residents to undue health, adverse life value implications, and depreciated home values.

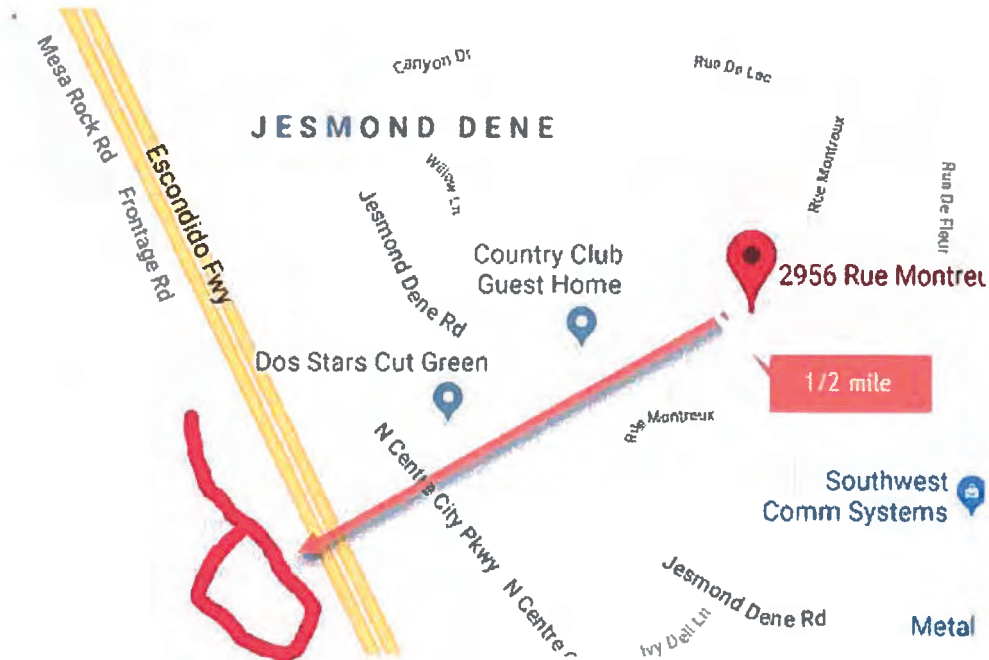
Exhibit 2

In addition to the visual impact, according to the applicant, **NEGATIVE CULTURAL RESOURCES SURVEY REPORT**, there are no Cultural Resources impacted. The report fails to call out the famous “Bear Rock” located on the top of the mountain directly connected to the hill that will need blasting and grading. No mention to this iconic rock or the disturbance of it was discussed. No tribal organizations were contacted to find out the significance of this iconic rock where neighborhood streets to the south call out names such as Bear Rock Glen.



Exhibit 3

Kennedy Residence 1/2 mile East of the Applicant and the Country Club Elderly home just 1/4 mile.



Sibbet, David

From: Ryan Kiesel <rkiesel@manchesterfinancialgroup.com>
Sent: Tuesday, October 08, 2019 4:51 PM
To: Sibbet, David
Cc: Gaspar, Kristin; Desmond, Jim; Jacob, Dianne; Fletcher, Nathan (BOS)
Subject: North County Environmental Resources - North Escondido

Dear Mr. David Sibbet,

I am writing you to provide my upmost protest against the proposed recycle facility in North Escondido. I live less than a quarter-mile away, and my children attend Calvin Christian school which is approximately ½ mile away as the bird flies. This facility is in a residential area. I know it is zoned industrial, but it is located in the middle of residences. Further, the principal owners of the proposed facility have been convicted of TWO FEDERAL environmental violations: 1) Illegal dumping of sewage over a number of years, and 2) tampering with emission control devices. These are not just accusations from decades ago, these are tried and convicted Federal cases within approximately the last year. Now the county is going to trust they will obey the law and allow them to recycle waste surrounded by homes.

This site will be an eye sore to those traveling on the 15 freeway in either direction. Moreover, the plans do not call for a fully enclosed building for all operations; however, based on the County code Section 6975, M54 and M58 Industrial use must be conducted in a facility fully enclosed as it abuts a residential site both to the south and to the north. Therefore, the County must require an EIR which apparently is not being considered, even though in your letter dated March 11, 2014 wherein you denied the process of the site plan for this facility due to the requirement of an EIR. Now in September 2019, you state an EIR is no longer necessary citing a 2011 GPU. The facts here do not make sense.

The County may need a recycle facility, but this location is not the right one, and the principals who would own and operate it are certainly, not the correct ones. The County must deny this proposal.

Sincerely,

Ryan Kiesel



Ryan Kiesel
Vice President & CFO | Manchester Financial Group

O:619-678-0404 | M: 760-554-0541
rkiesel@manchesterfinancialgroup.com | manchesterfinancialgroup.com
2550 Fifth Ave. Suite 900, San Diego CA 92103



Sibbet, David

From: Ryan Kiesel <rkiesel@manchesterfinancialgroup.com>
Sent: Wednesday, October 23, 2019 8:49 AM
To: Sibbet, David
Subject: RE: North County Environmental Resources - North Escondido

David,

What is your response to allowing a developer, Hilltop Group, Inc, who is owned by the same individuals as Diamond Environmental Services to be allowed to develop a recycle facility in a relatively residential neighborhood. These are the same individuals that have been CONVICTED on two serious federal charges for environmental violations. These were not just accidental violations; these were willful fraudulent acts that resulted in jail time. How do you respond to that?

Further, can you please specifically identify in the August 2011 GPU where this project conforms as it was proposed after the GPU was adopted? For in your own letter dated March 11, 2014, you require an EIR when that GPU existed at that time.

I expect a response.

Thank you,
 Ryan



Ryan Kiesel
Vice President & CFO | Manchester Financial Group
 O: 619-678-0404 | M: 760-554-0541
 rkiesel@manchesterfinancialgroup.com | manchesterfinancialgroup.com
 2550 Fifth Ave. Suite 900, San Diego CA 92103



From: Sibbet, David <David.Sibbet@sdcounty.ca.gov>
Sent: Wednesday, October 9, 2019 6:40 AM
To: Ryan Kiesel <rkiesel@manchesterfinancialgroup.com>
Subject: RE: North County Environmental Resources - North Escondido

Thank you for your comments. This email is confirmation that they have been received.

DAVID SIBBET, Planning Manager

COUNTY OF SAN DIEGO | Planning & Development Services
 5510 Overland Avenue | Suite 310 | San Diego | CA | 92123
 T. 858.694-3091 | F. 858.694.3373 | MAIN 858.694.2960
 PDS Website <http://www.sdcounty.ca.gov/pds/index.html>
 PDS Mapping Service <http://gis.co.san-diego.ca.us/>

From: Ryan Kiesel <rkiesel@manchesterfinancialgroup.com>
Sent: Tuesday, October 08, 2019 4:51 PM
To: Sibbet, David <David.Sibbet@sdcounty.ca.gov>
Cc: Gaspar, Kristin <Kristin.Gaspar@sdcounty.ca.gov>; Desmond, Jim <Jim.Desmond@sdcounty.ca.gov>; Jacob, Dianne <Dianne.Jacob@sdcounty.ca.gov>; Fletcher, Nathan (BOS) <Nathan.Fletcher@sdcounty.ca.gov>
Subject: North County Environmental Resources - North Escondido

Dear Mr. David Sibbet,

I am writing you to provide my upmost protest against the proposed recycle facility in North Escondido. I live less than a quarter-mile away, and my children attend Calvin Christian school which is approximately ½ mile away as the bird flies. This facility is in a residential area. I know it is zoned industrial, but it is located in the middle of residences. Further, the principal owners of the proposed facility have been convicted of TWO FEDERAL environmental violations: 1) Illegal dumping of sewage over a number of years, and 2) tampering with emission control devices. These are not just accusations from decades ago, these are tried and convicted Federal cases within approximately the last year. Now the county is going to trust they will obey the law and allow them to recycle waste surrounded by homes.

This site will be an eye sore to those traveling on the 15 freeway in either direction. Moreover, the plans do not call for a fully enclosed building for all operations; however, based on the County code Section 6975, M54 and M58 Industrial use must be conducted in a facility fully enclosed as it abuts a residential site both to the south and to the north. Therefore, the County must require an EIR which apparently is not being considered, even though in your letter dated March 11, 2014 wherein you denied the process of the site plan for this facility due to the requirement of an EIR. Now in September 2019, you state an EIR is no longer necessary citing a 2011 GPU. The facts here do not make sense.

The County may need a recycle facility, but this location is not the right one, and the principals who would own and operate it are certainly, not the correct ones. The County must deny this proposal.

Sincerely,

Ryan Kiesel



Ryan Kiesel
Vice President & CFO | Manchester Financial Group

O: 619-678-0404 | M: 760-554-0541
rkiesel@manchesterfinancialgroup.com | manchesterfinancialgroup.com
 2550 Fifth Ave. Suite 900, San Diego CA 92103



Sibbet, David

From: robert kirschenbaum <rkirsch44@icloud.com>
Sent: Friday, October 04, 2019 12:26 PM
To: Sibbet, David; Wardlaw, Mark; Mills, Benjamin
Subject: Environmental Impact at 25568 Mesa Rock Road

Please review the below carefully.

SUBJ: NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN I-15 REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012 Arie DeJong, Hilltop Group Inc. is seeking to construct a recycling plant at 25568 Mesa Rock Road. The County determined that a full Environmental Impact Report (EIR) was necessary in 2015, however; the applicant is now using the California Environmental Quality Act process to provide less information in an attempt to satisfy existing County environmental standards. Given the potential impact of the project on the surrounding area, a full EIR should be required. I request the applicant to be required to submit a full Environmental Impact Report for this project as the County required in 2015. The hundreds of pages of information submitted by the applicant cannot be adequately reviewed by residents in the 30-day time period allowed by your department – the comment period is closing on October 14, 2019. I request that time period be extended to 90 days. The presence of an industrial recycling center in this residential area would be disruptive and have a number of negative consequences for local residents, to include: ☐ Health: Possible negative health consequences due to decreased air quality and a lack of monitoring of emissions from this site. There are no independent controls proposed to limit the items brought to, or delivered from this recycling center. ☐ Production: The applicant claims that 48 tons of material will be produced daily, and the environmental impact reports submitted are based on that level of output. The applicant is legally allowed to produce 174 tons daily, which would vastly increase impacts to the surrounding area and render their submitted environmental reports invalid. ☐ Noise: Machinery capable of delivering and processing concrete and other building materials operating between the hours of 5am to 7pm, Monday through Saturday. ☐ Traffic: More heavily-laden trucks and passenger vehicles driving on our already burdened local roads and decreasing their serviceable life. ☐ Decreased Property Values: Due to the presence of high-impact industrial activity in close proximity to our homes, disturbing noise and unknown air quality effects from this project. High-impact industrial activity is inconsistent with the surrounding area, harmful to our interests and needs to be stopped. Inscribed on the seal of the County of San Diego are the words, "The Noblest Motive is the Public Good." I ask you, and all County government, to live up to those words. The public good is not served by such a disruptive presence as this proposed project. Additional Request For Jim Desmond: As our new District 5 Supervisor, I would appreciate you investigating this project, the 2011 re-zoning of the applicant's property that made it possible, and the circumstances surrounding the multi-year planning process that has ensued. It has been strongly opposed by residents and the Twin Oaks Valley Community Sponsor Group. The original plan was to open a nursery on this site, a project that would garner considerable support in the community and join the other popular commercial establishments currently operating nearby.

Robert Kirschenbaum
 1913 Buckskin Glen
 Escondido CA 92027
 760/747 7534
 Cell 760/670 1477
[email: rkirsch44@icloud.com](mailto:rkirsch44@icloud.com)



Sibbet, David

From: robert kirschenbaum <rkirsch44@icloud.com>
Sent: Saturday, October 19, 2019 7:56 PM
To: Sibbet, David
Subject: TOXIC RECYCLING PLANT

Dear Mr. Sibbet, please let us residents of the Escondido area know what is being done to prevent this dangerous plant from going ahead. And let us know please what we can do to help, thanks,
Robert Kirschenbaum

URGENT SUPPORT NEEDED: TOXIC RECYCLING PLANT ON I-15 & MESA ROCK ROAD

This is a full-on Bait & Switch situation on how they're pushing it through - and it should not be allowed to happen. Posted in Crime & Safety because it is 100% a Safety issue and will undoubtedly become a serious Health Issue for all of us that live in this area. Furthermore, if this toxic plant is allowed to move forward, it most definitely would be a crime against humans, wildlife, and the environment. The dreaded toxic plant (includes asbestos, mold, etc.) that reared it's head back in 2013 is moving forward, and San Diego County intends to issue them a permit. Among other deeply concerning issues - Your air quality is about to become very toxic. There is currently no provision for monitoring this site once it's started, and insanely enough, they are not required to submit a full Environmental Impact Report - which is outrageous. I also find it very interesting that the affected neighborhoods were not notified. Usually when there is something unsavory afoot - it's politically customary to keep the public unconscious about it.

Robert Kirschenbaum
1913 Buckskin Glen
Escondido CA 92027
760/747 7534
Cell 760/670 1477
[email: rkirsch44@icloud.com](mailto:rkirsch44@icloud.com)



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Sibbet, David

From: Martin Koenekamp <pmk@cox.net>
Sent: Sunday, October 27, 2019 3:53 PM
To: Sibbet, David
Subject: Fwd: CAIZON

Patricia Koenekamp

Begin forwarded message:

Sorry, previous emailed message didn't have my complete address at bottom. This one is complete.

From: Patricia Koenekamp <pmk@cox.net>
Date: October 27, 2019 at 3:45:48 PM PDT
To: David.Sibbet@sdcounty.ca.gov
Subject: CAIZON

Date: 10/27/19

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov County of San Diego - Planning and Development Services

5510 Overland Avenue, Suite 310

San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08- 015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

("Project"). I submit this public comment letter concerning the proposed section 15183 exemption ("Proposed Exemption") as the County of San Diego ("County") should require the applicant, Hilltop Group Inc. ("Applicant"), to prepare an Environmental Impact Report ("EIR") for the Project due to its foreseeable significant environmental impacts which will impact my family's and my community's health and well-being. I am dismayed that the County, having determined in 2015 that the Project requires an EIR, now proposes to fast-track environmental review of the Project through an unsupported and inapplicable exemption to limit public participation contrary to CEQA's requirements.

It is inappropriate for the County to base proposed findings supporting the Proposed Exemption on technical reports, many of which are five to ten years old and do not reflect existing baseline conditions, and others which are explicitly drafts or preliminary in nature. The alleged findings of these unreliable reports do not support the necessary findings for the Proposed Exemption. Moreover, many of the technical reports speciously base their analysis on how the Applicant says it will operate the Project instead of the maximum physical uses, thereby violating CEQA's mandate that the worst-case scenario be used to assess a project's foreseeable environmental impacts and wrongly allowing the reports to minimize the Project's impacts. An EIR is needed to ensure that these concerns are addressed and so there is public transparency for this highly-controversial project.

The peculiar presence of an industrial processing facility largely surrounded by residential areas will be disruptive and have myriad significant environmental consequences on nearby residents, including:

- Particulate emissions from demolition and leveling on mountain side as well as from operation of crushing and grinding and material handling equipment outdoors.
- Noise from explosive blasting during construction phase and then the operation phase of crushing and associated equipment on site.

- Operating hours of 5:00 AM - 7:00 PM, 6 days a week contrary to General Plan Policy N-5.2.
 - Noise and dust from fully loaded trucks entering and leaving site through Mesa Rock Road, Center City Parkway and the Deer Spring overpass.
 - Community is burdened with monitoring and reporting violations including gas emissions, noise, dust, or truck loads in and out. Monitoring equipment not included in project.
 - Excessive grading of an iconic hill and rock known by residents with affection as Bear Rock.
 - A facility to be perched on high level grade in view of over 6100 residents.
- I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, _____

Print Name, _____ Patricia F. Koenekamp _____ Address, _____
 _____ 363 _____ Melbourne Glen _____ Escondido. CA 92026 _____

I live in an area that will be significantly impacted by the proposed North County Environmental Resources (NCER)

Additional project concerns:

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Sibbet, David

From: Gouin <m.korpi@cox.net>
Sent: Wednesday, September 25, 2019 3:24 PM
To: Sibbet, David
Cc: Neufeld, Darin; Armstrong, Jacob
Subject: Contesting the Concrete Crushing Plant on Mesa Rock Road

David,

I am writing to you with great concern in relation to the Concrete Crushing Plant on Mesa Rock Road (below Bear Rock on west side of I-15). I implore that you do not approve this project and have listed the issues of concern below.

- Gas emissions for the use of heavy equipment including large/heavy trucks entering and leaving the facility.
- Dust emissions from these trucks and the raw materials they are hauling
- Noise from the operating of the machinery to crush, grind and screen and of course the noise of the heavy trucks.

In closing this facility is not suitable to operate in a residential location and should definitely not be approved.

Regards,

Mary Korpi

Homeowner Jesmond Dene neighborhood

Sibbet, David

From: Ashly K <ahearte@yahoo.com>
Sent: Sunday, October 27, 2019 11:51 PM
To: Sibbet, David
Subject: North County Environmental Resources Site plan review, S.O: PDS2008- 3500-08-015, LOG NO PDS2008-3910-0808012
Attachments: P1.pdf; P2.pdf; P3.pdf; P4.pdf; P5.pdf; P6.pdf

10/27/19

Dear Mr Sibbet,

I am a resident that will be affected by the North county Environmental Resources project. I appose this project. This will have vast environmental impacts that will impact my children, my peaceful home and location, all of our neighbors and the noise from this project will impact nearby schools, children and wildlife. The proposed hours of operation interfere with our peaceful and quiet community and will negatively affect our home values. Many children and adults suffer from asthma and other ailments; this will impact their health and mine in the long term. It is Inappropriate to fast track this project and not conduct an environmental report and to use old information to assess this. They need to submit an EIR for environmental and public safety.

Attached is 6 signed opposition letters. Please advocate for us and convey our concerns to Director Mark Wardlaw and all others that can and should appose this abominable project.

Thank you,

Ashly Kovesi

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Date: 10/27/19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

I am a resident who will be affected by the North County Environmental Resources project ("Project"). I submit this public comment letter concerning the proposed section 15183 exemption ("Proposed Exemption") as the County of San Diego ("County") should require the applicant, Hilltop Group Inc. ("Applicant"), to prepare an Environmental Impact Report ("EIR") for the Project due to its foreseeable significant environmental impacts which will impact my family's and my community's health and well-being. I am dismayed that the County, having determined in 2015 that the Project requires an EIR, now proposes to fast-track environmental review of the Project through an unsupported and inapplicable exemption to limit public participation contrary to CEQA's requirements.

It is inappropriate for the County to base proposed findings supporting the Proposed Exemption on technical reports, many of which are five to ten years old and do not reflect existing baseline conditions, and others which are explicitly drafts or preliminary in nature. The alleged findings of these unreliable reports do not support the necessary findings for the Proposed Exemption. Moreover, many of the technical reports speciously base their analysis on how the Applicant says it will operate the Project instead of the maximum physical uses, thereby violating CEQA's mandate that the worst-case scenario be used to assess a project's foreseeable environmental impacts and wrongly allowing the reports to minimize the Project's impacts. An EIR is needed to ensure that these concerns are addressed and so there is public transparency for this highly-controversial project.

The peculiar presence of an industrial processing facility largely surrounded by residential areas will be disruptive and have myriad significant environmental consequences on nearby residents, including:

- Particulate emissions from demolition and leveling on mountain side as well as from operation of crushing and grinding and material handling equipment outdoors.
- Noise from explosive blasting during construction phase and then the operation phase of crushing and associated equipment on site.
- Operating hours of 5:00 AM - 7:00 PM, 6 days a week contrary to General Plan Policy N-5.2.
- Noise and dust from fully loaded trucks entering and leaving site through Mesa Rock Road, Center City Parkway and the Deer Spring overpass.
- Community is burdened with monitoring and reporting violations including gas emissions, noise, dust, or truck loads in and out. Monitoring equipment not included in project.
- Excessive grading of an iconic hill and rock known by residents with affection as Bear Rock.
- A facility to be perched on high level grade in view of over 6100 residents.

I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, Ashly Kovesi

Print Name, Ashly Kovesi Address, 25157 Jesmond Lane Rd.
Escondido CA 92026

Sibbet, David

From: Byron Marler <marlerstorm1@gmail.com>
Sent: Tuesday, October 22, 2019 3:51 PM
To: Sibbet, David
Cc: warren.wardlaw@sdcounty.ca.gov
Subject: North County Environmental Resources Project PDS 2008-3500-08-015
Attachments: David Sibbet letter oct22 review.docx

Dear Mr. Sibbet,

With reference to the subject project, I am attaching a letter in response to the Public Comments invited before Oct 28, 2019.

Thanks in advance for your consideration of the comments that I have made.

Yours truly,

Byron Marler
25147 Rue De Fleur
Escondido, CA 92026

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From Byron Marler

October 22, 2019

David Sibbet
Planning Manager
Planning and Development Services
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, CA 92123
Email: David.Sibbet@sdcounty.ca.gov

cc. Mark Wardlaw, Director
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
Email: mark.wardlaw@sdcounty.ca.gov

THIS LETTER SENT BY EMAIL.

SUBJECT: North County Environmental Resources PDS2008-3500-08-015, PDS2013-BC-13-0019; PDS2008-3910-0808012

Mr. David Sibbet,

At Planning and Development Services (PDS) meeting, Sept. 24 in San Marcos, you encouraged the audience to prepare written comments, concerns, and questions to be submitted to PDS by October 14, 2019. Subsequently that deadline has been extended to October 28, 2019.

The following is my list of concerns and questions. I expect my concerns to be treated in a mindful way by PDS, and hope to have answers provided by PDS. I believe that PDS will find merit in my analyses, questions, and concerns regarding the vagueness, possible deceptions, inaccuracies and non-disclosures in the applicant's documents to an extent that PDS will reject the Section 15183 processing. I request that PDS require a full EIR be prepared for the NCER project.

Concern – Planning and Development Services (PDS) required an EIR for the NCER project in 2014, found significant deficiencies in a draft EIR and then

From Byron Marler

enumerated those deficiencies to the project applicant in May 2015. There were no subsequent notices of action provided to the public. Then in September 2019 PDS determine that CEQA section 15183 could be used to approve the project. What changed in the 4 years between 2015 and 2019? Why weren't the list of interested citizens informed of project updates during the 4 years? Did the applicant make all payments required to keep project file active in a timely manner?

Concern – Economic analysis of the project clearly shows that tipping charges for 6 truckloads per day and sales fees for 2 truckloads finished product, totaling a daily income of about \$2,400 (based on prevailing rates) cannot cover salaries of 18 employees. In fact considering capital spending for site preparation, road and pad construction, buildings, equipment, infrastructure, and operating costs, NCER will be very unprofitable. The importance of this unprofitable condition is that the applicant/operator will need to increase materials thru-put to increase income and avoid bankruptcy. The project description citing 6 truckloads in-bound and 2 truckloads out-bound daily seems to be a deception. The owner/operator of the NCER must know this and probably is planning on increasing the facility thru-put after the facility goes operational. Applicant's current studies on air quality, noise, traffic, and other public nuisances are all based an operations scenario of 6 truckloads in and 2 truckloads out per day. These studies would be of little value if NCER does increase material thru-put to amounts greater than “the daily maximum combined process tonnage of C&D wood debris and/or CDI debris allowed by the Local Enforcement Agency”, which is 174 tons.

PIECEMEALING, starting small, then increasing material thru-put and operation rates to a point of exceeding the permit/legal limit (174 tons/day) over time would be illegal, but also would be difficult to detect and enforce. PIECEMEALING in this manner will not be tolerated. How can the citizens who live near this proposed facility monitor and stop PIECEMEALING in the future at NCER?

Electronic monitoring (counting) trucks entering and leaving the NCER facility is one way to check compliance with facility operating limits. Operator's log sheets of daily tonnage received is another way to monitor and check compliance. Water usage data from meters is a way to check compliance with dust control management. These monitoring measures and others can be done relatively inexpensively via electronic measuring devices and these data can be place on a

From Byron Marler

public accessible internet website in real-time and/or as daily totals. If applicant refuses to implement monitoring and make the data available to public as suggested here, that refusal would support the contention that NCER plans on increasing thru-put of materials to levels exceeding the legal limit, 174 tons per day. Will PDS require monitoring as suggested here? Will PDS require these data from NCER be made available by a public accessible website?

Concern - Will NCER have the water needed to properly control fugitive dust emissions?

In an inquiry to the Vallecitos Water District, we learned there is no current commitment by the district to supply 1,200,000 gallons per year of water as claimed by NCER. "The last request that we have on record for water availability to this property is was back in 2013. The District has no commitment or agreement to serve this property. A water and sewer study would be required to determine what impacts the proposed project would have on District infrastructure. (Oct 1, 2019, **Robert Scholl, P.E., Senior Engineer – Development Services Vallecitos Water District**)

Water spraying and misting is the cited method of dust (PM10, PM2.5) control to be used by NCER. The applicant states, "Approximately 3.68 acre-feet per year (AFY) would be pumped with implementation of the proposed project. The project is anticipated to need approximately 2,400,000 gallons of water per year (7.36 AFY) and roughly half would be delivered by the Vallecitos Water District and the other half would be pumped from on-site wells." Thus on-site wells would need to supply about 1,200,000 gallons per year. However, the PDS STATEMENT OF REASON TO EXEMPT ----states, " The site contains six permitted groundwater wells; however, these wells will be destroyed under permit and inspection by the Department of Environmental Health." Will any of the wells be preserved? Will new wells be drilled?

Also it is noted in the applicant's Air Quality Memorandum, in Attachment A, that only 1,200,000 gallons were entered into the CalEEMod emissions model. This implies that well water will not be used or was overlooked in the calculations of Green House Gas emissions. Does PDS agree that well water pumping was not included in the Green House Gas emissions? Does PDS agree that there be adequate water for fugitive dust control at NCER?

Potential lack of water is significant new information which could nullify permit processing via CEQA 15183. Does PDS agree with this statement?

From Byron Marler

Air Quality Concerns – Emissions trade-offs

Applicant's Air Quality Memorandum (AQM) it states that in the future trucks that would have delivered materials to and transported processed materials away from Miramar, Otay and other CDI facilities will come to NCER. Equipment use reductions and resulting emissions reductions at Miramar and Otay will then be matched by equipment use increases and emissions at NCER. Thus no net increase in air pollutant emissions will occur from the processing of materials at NCER. This trade of emissions among the facilities is then used as the reason that air pollution emissions from truck-dumping, front-end loaders, bulldozer, stackers, concrete crusher, and wood debris grinder are not reported in the applicant's air quality memorandum. From an air district perspective this may make some sense, not to double count the emissions. However, this seems like a deception and makes no sense from a homeowner's perspective living downwind of the NCER facility. It doesn't tell how much new air pollution will in the air at his/her home.

How is it assured that one-for-one trade-off occurs among reduced emissions from Miramar and Otay and increased emissions at NCER? Is this contract based? Is it enforceable by the SDAPCD? Is it enforceable by any county agency/authority? What prevents NCER from taking CDI debris, waste wood and green waste from other sources? Are there year-to-year growth trends in CDI debris and wood waste? If so, then all new emissions at NCER must be addressed in Table 6 of the AQM. Does PDS agree with this assessment?

Or is SD County showing no net growth in CDI debris? No net growth in CDI debris also begs the question – is another facility needed? Is there any benefit provided to the public by an additional CDI facility? There are other near-by facilities that can handle the materials NCER plans to receive. Considering the nuisance to local neighborhoods that NCER will cause, why is NCER needed? Why should it be permitted?

Air Quality Concerns – Emissions

The applicant's AQM presents modeled emissions for operations in Table 6. Only additional equipment (not being used at Miramar and Otay) consisting of a trommel screen and a shaker screen are used in the model. The resulting emissions are stated to be 32.35 lbs/day for PM10 and 7.78 lbs/day for PM2.5. These modeled emission values are below the County's criteria limits of 100 lbs/day

From Byron Marler

PM10 and 55 lbs/day PM2.5, thus a determination of not significant is made. However, these calculations do not include emissions from crushing, grinding, materials stacking, front-end loaders dumping and other emission sources. This seems like a deception. All PM10 and PM 2.5 emission must be included in table 6 to assure public of the true emission values. Does PDS agree?

During construction 244,464 yards of rock and blast debris will be processed during 2 – 4 weeks on site. Assuming 1 yard of rock debris weighs about 1 ton, this equates to 9000 - 18000 tons per day fed to an on-site crusher per the construction description. Table 6 of AQM states 32.35 lbs/day of PM10 results from 174 tons/day intake. Ratio for PM10 emissions from crushing 9000 – 18000 tons per day compared to 32.35 lbs/day emissions for 174 tons processed in operations would far exceed the 100/lbs/day criteria (math suggests factor of 50 - 100 times, 1600 -3200 lbs/day PM10 emitted by construction crushing). This crushing activity was not counted in the CalEEMod model used by applicant's consultant. Doesn't this exceed County's emissions criteria?

Concern - Quality of Applicant's documents

Applicant's documents for NCER presented on PDS website are far too vague in description of site plan, details of equipment to be used and amount of material that will be processed. For example PDS "Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist Pursuant to CEQA Guidelines §15183" states, "NCER is anticipated to release two truckloads per day (approximately 48 tons per day, 15,000 net tons annually) of finished product. The daily maximum combined process tonnage of C&D wood debris and/or CDI debris allowed by the Local Enforcement Agency (LEA) is 174 tons." However, Attachment A of the AQM indicates 174 tons of CDI and 199 tons of C&D wood debris used in the emission calculations. Dates on the emissions analysis (Attachment A) indicates the work was done in 2017. Is it clear to PDS which emission values were used in the calculations? What emissions were used?

Other NCER studies in the PDS public electronic files date from 2009, 2012 and 2013. "Hazardous Load Check/Materials Program" refers to a "Fact Sheet" dated in 2007. How can a traffic study done in 2012 be relevant to 2019, especially considering the housing development and planned housing development along I-15? Doesn't the applicant need to update aged studies to reflect here and now environmental setting and the projected impacts of the NCER facilities? Will PDS require updates be made to the aged studies provided by the applicant?

From Byron Marler

Concern – Noise

In the applicant's "Supplementary Noise Technical Analysis" "noise modeling is based on a standard equation for noise attenuation with distance known as the Inverse Square Law, in which for discrete noise sources (such as for individual pieces of construction equipment including the rock crusher), the sound level decreases at a rate of 6 decibels (dB) per doubling of distance." Results of this modeling analysis show a small exceedance of county criteria at the eastern residences. Given this exceedance, more sophisticated modeling should be applied to account for atmospheric effects, especially winds and temperature inversions.

Nocturnal temperature inversions commonly develop in the site area during the night-time hours, resulting in colder, denser air near the ground and warmer, less dense air aloft. Inversions cause refraction of sound waves that project upward from a source causing sound to bend downward toward the surface. This can increase the noise intensity (loudness) at more distant locations than would be projected by the Inverse Square Law.

Also wind speed and direction tends to move the sound along the direction of the wind. The prevailing winds are generally from the west to the east, and will tend to transmit NCER site noise further to the east than would be shown by the modeling used in the applicant's report. The combination of temperature inversion and light winds will move greater sound intensity (louder noise) further from the source than would be calculated by simple application the Inverse Square Law. In the case of the residence located to the east of the plant site, where the modeled noise level is 58 dBA (exceeding the County's criteria), the resulting noise levels would be louder (further exceeding the criteria) than shown in the report. This would be especially true during early morning hours with temperature inversion and light air flow moving west to east. Will PDS require a more sophisticated noise model, one that includes atmospheric effect, be used in the Acoustic Analysis for NCER?

Noise levels emanating from the NCER can be reduced by placing crushing and grinding equipment inside buildings or behind sound barriers. Will PDS require noise abatement techniques be used at the NCER facility?

From Byron Marler

NCER plans on operating the facility 6 days per week during the hours of 5 am to 7 PM. Temperature inversions and light easterly directed breezes will transmit nuisance level noises into the neighborhoods east of I-15. During winter when sunset is near 5 PM, cooling ground surfaces will re-establish temperature inversions over the area and prevailing winds (west to east) will carry nuisance level noise in to these neighborhoods. Revising NCER operating hours to 8 am – 5 PM will help mitigate this noise nuisance. Will PDS require operating hours for NCER be limited to day time?

A survey of other CDI facilities shows operating hours range 7 - 8 am as opening time and 4 - 5 PM closing time. Why does NCER need a 5 am opening time and a 7 PM closing time? Considering the noise created by NCER, the nuisance it causes to adjacent neighborhood, NCER proposed hours should be revised – does PDS agree?

Concern – Noise criteria. Applicant's noise study, Attachment A, "NOISE ASSESSMENT" Prepared By: Jeremy Loudon, 446 Crestcourt Lane Fallbrook, California 92028 May 2013 shows the method by which the noise limit standard is calculated, "the Project is zoned industrial (M54) and the surrounding properties are zoned Rural residential (A-70 & RR). The project site, zoned M54, is subject to a one-hour average sound level limit of 70 dBA anytime. Abutting land uses to the west, east, and south are zoned A70 and RR that allows a one-hour average sound level of 50 decibels (dBA) from 7 a.m. to 10 p.m. and 45 decibels (dBA) from 10 p.m. to 7 a.m. The final one-hour average sound level limit for two zoning districts is the arithmetic mean of the respective zones. In this case, the most conservative property lines along the western, eastern and southern boundaries would be subject to 60 dBA daytime and 57.5 dBA nighttime under Section 36.404 of the Noise Ordinance". The 57.5 dBA limit criteria are used to determine noise exceedance at the eastern residence. However land at the eastern residence does not abut to the NCER M54 zoned parcels. Thus the averaging method to determine limit criteria should not be used. Noise limit standard there and at other eastern residences (zoned A-70, RR) should be 50 dBA daytime and 45 dBA nighttime hours. Does PDS agree with this assessment of noise criteria? Does noise generated at NCER pose a potential noise standard exceedance at the eastern residence(s)?

There are residences at a range of about 3,000 ft. from the NCER site, and these residences have a direct line view, with no terrain blocking, to the plant site. These residences would receive 52 dBA (or more considering atmospheric effects) from noise made at NCER. This estimate is made using the 6 dBA decrease per doubling of distance, applied to the 58 dBA modeled at 1580 ft. range eastern

From Byron Marler

residence. County's noise limit criteria at these residences are 50 dBA daytime and 45 dBA nighttime hours. Noise made by NCER and received at an intensity of 52 dBA at these residences would exceed the County's noise criteria limit. Does this noise level and implied standard exceedance pose a problem? What is PDS' assessment?

Concern – What happens to the material not processed? Applicant's AQM states, "The proposed project is expected to require crushing and grinding for approximately half of the material processed onsite, which equates to approximately 4,000 tons annually or a maximum of 20 tons per day being crushed." What happens to the other half of the material that is not crushed or ground? Does the applicant have an answer? Does subsequent handling of this material cause emissions not counted in Table 6? Does PDS have the answers?

Thank you for providing this opportunity to bring my concerns to the attention of Planning and Development Services.

Byron Marler

A handwritten signature in black ink that reads "Byron Marler". The signature is written in a cursive, flowing style.

25147 Rue De Fleur
Escondido, CA. 92026

Sibbet, David

From: Byron Marler <marlerstorm1@gmail.com>
Sent: Monday, October 28, 2019 10:10 AM
To: Sibbet, David
Cc: rirangan@yahoo.com
Subject: NCER Letters PDS 2008-3500-08-015
Attachments: Scanned letter 1.jpeg; letter 2 page 1.jpeg; letter 2 page 2.jpeg

Mr. David Sibbet,

Please find attached 2 letters from citizens who are giving input on the subject project. One of the letters includes a page 2 where you'll find additional written input.

Thanks you.

Byron Marler
25147 Rue De Fleur
Escondido, CA

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Sibbet, David

From: Byron Marler <marlerstorm1@gmail.com>
Sent: Monday, October 28, 2019 3:45 PM
To: Sibbet, David
Cc: Wardlaw, Mark; rirangan@yahoo.com
Subject: NCER Letters PDS 2008-3500-08-015 -- comment/concerns
Attachments: BM LETTER TO SIBBEt 10282019.docx; 05182005 Item 19 (dragged).pdf

David, Some addition information I'd like PDS to consider are attached. Thank you.

Byron Marler
25147 Rue De Fleur
Escondido, CA

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October 28, 2019

David Sibbet
Planning Manager
Planning & Development Services
County of San Diego

cc. Mark Wardlaw
Director – Planning and Development Services
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, CA 92123.
THIS LETTER HAS BEEN SENT BY EMAIL

North County Environmental Resources Project, PDS 2008-3510-08-015

Dear Mr. Sibbet;

Further to my letters of comment dated October 22, 2019, I am writing to convey the following information related to public comments regarding the subject project.

In a letter (attached to email) from David R. Shibley, dated April 21, 2005, to The Board of Supervisors, RE: Request to change residential zoning..., arguments were provided in support the zoning change to heavy industrial for the parcels which would be used by NCER. On page 3 of the letter 11 reasons in favor of the change are listed. Comparing the details of that list of reasons to the realities the environmental setting of today, at least 7 of those arguments are not valid. For example, item 5 states nearest residence is 1.5 – 2 miles away, but today homes are within 600 ft. of the site. My point is that the basis for the zoning change was weak. The reason and needs listed are no long pertinent. My letter lays a basis on which a change of the zoning could be considered. The I-3 zoning of those parcels are an example pocket zoning. The I-3 zoning is incompatible with the residential uses of the surrounding lands. I believe this information should be included in the information given consideration by PDS and provided to the Zoning Administrator.

Yours truly,

A handwritten signature in black ink that reads "Byron Marler". The signature is fluid and cursive, with the first name "Byron" and last name "Marler" clearly distinguishable.

Byron Marler

Email: marlerstorm1@gmail.com

25147 Rue De Fleur

Escondido, CA 92926

DAVID R. SHIBLEY

**1923 BEDFORD PLACE
ESCONDIDO, CA. 92029
E-MAIL: shibley1@cox.net**

**AND
ASSOCIATES**

OFFICE: (760) 737-9007
FAX: (760) 737-9789
CELL: (760) 443-5028

April 21, 2005

**The Board of Supervisors
County Administration Center
1600 Pacific Highway, Room 335
San Diego, California 92101**

Re: Request to change residential zoning on 3 parcels of land in the North County Metro/Twin Oaks Sponsor Group area to heavy industrial as part of the General Plan 2020 Update at the Board of Supervisors Hearing scheduled for May 11, 2005. The parcels in question are 187-100-31, 35 & 37 totaling a gross acreage of 45.15 acres that should yield 25 to 30 acres of net usable acreage

Dear Supervisors:

I represent Arie de Jong and Mr. de Jong is requesting a zone change as part of the General Plan 2020 update to be heard before the Board of Supervisors on May 11, 2005 for 3 of 6 parcels he owns in the North County Metro/Twin Oaks Sponsor Group area just on the west side of I-15 and on the south curve of Mesa Rock Road as it passes under I-15. Refer to the attached Thomas Bros map for an exact location. The property is in the unincorporated area and contiguous to the City limits of Escondido. It only recently became available as of February 18, 2005 after the Escondido High School District turned it down as the site for a new high school.

Arie would like to change the zoning from residential/agriculture to heavy industrial. He owns 6 parcels for a total of 141 acres but is only requesting a zone change on 3 of the parcels. The property years ago was a farm home with an avocado grove and still has seven wells on site. Later it was used as a gravel pit and borrow site by CALTRANS during construction of the I-15 Freeway. CALTRANS left the furthest south 35 acres of the site in a deplorable condition with large cuts in the hillsides and black top, and debris scattered throughout the site. Refer to the photo with the close view of the 35 acres for confirmation of the condition of the site. After CALTRANS abandoned the site it was purposed as the site for a Recreational Water park named White Water. That was later abandoned and then the property was purchased by Arie de Jong.

OFFICIAL RECORD

Clerk of the Board of Supervisors

Exhibit No. 5 Agenda No. _____

Meeting Date 5/11/05

Presented by _____

Document No. _____

THOMAS J. PASTUSZKA

THOMAS J. PASTUSZKA
Clerk of the Board of Supervisors

If the rezoning is successful Arie intends to build a construction materials recycling facility for concrete, asphalt, wood and all other recyclable materials produced at construction sites. He will also build a large green waste composting facility. The green waste facility will be a more than adequate replacement for the largest green waste facility in the County currently located near Brown Field and scheduled for closure within less than six months. At completion of grading the southerly 35 acres should have a net acreage yield of 23 to 30 acres allowing ample room for this combination facility. Notice that Arie's other 3 parcels (79 acres to the west and 6.87 and 6.14 acres to the north) will provide more than an adequate buffer for his proposed project.

On the 16th of February Arie de Jong and I appeared at the Twin Oaks Sponsor Group meeting and requested the zone change as part of the General Plan 2020 Update process. We also appeared at the Planning Commission hearings. We were denied by both the Sponsor Group and the Planning Commission. At the sponsor group meeting the Golden Door presented a relocation proposal for their facility to eventually relocate from adjacent to Deer Springs Road to the center top of the 400 acres they own. The Sponsor Group agreed to work with them on their proposal. I only bring this up to indicate that the relocation of the Golden Door facility to the top of their property will not be in conflict with Arie de Jong's rezoning as the de Jong parcels are far enough south and separated by ridgelines from the proposed Golden Door relocation.

Please refer to the attachment three newspaper articles and it will immediately become evident there is a need for this type of facility. The basis of the articles is Assembly Bill 939 which is a state law requiring all jurisdictions in the County to reduce reuse and recycle at least 50 percent of their trash stream placed in landfills or face fines of up to \$10,000 a day. Certain areas in the County are currently only at 44%. The articles talk of the City and County building a construction and demolition mixed recycling facility in Miramar. Mr. de Jong's facility would place this task in the hands of private enterprise, which is significant when you consider how limited public funds currently are. Even if the Miramar facility is constructed you will need a similar facility to service the North County Cities.

County Planning Staff hired a consultant named Economics Research Associates (ERA) to complete and submit a report estimating how much industrial employment lands the projected resident population would support under the General Plan 2020 Update. The report found a deficiency of 49 acres of Industrial land in the Twin Oaks Sponsor Group area. This project would help close that deficiency.

In addition you will find enclosed two letters from the office of State Assemblyman Mark Wyland. One is directed to the Planning Commission the other to Supervisor Bill Horn. The purpose of both letters is simply to make

everyone aware of the fact that in certain areas of the County the 50% landfill diversion required by Assembly Bill 939 is not being met.

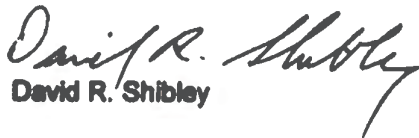
The specific merits of Mr. de Jong's site are as follows:

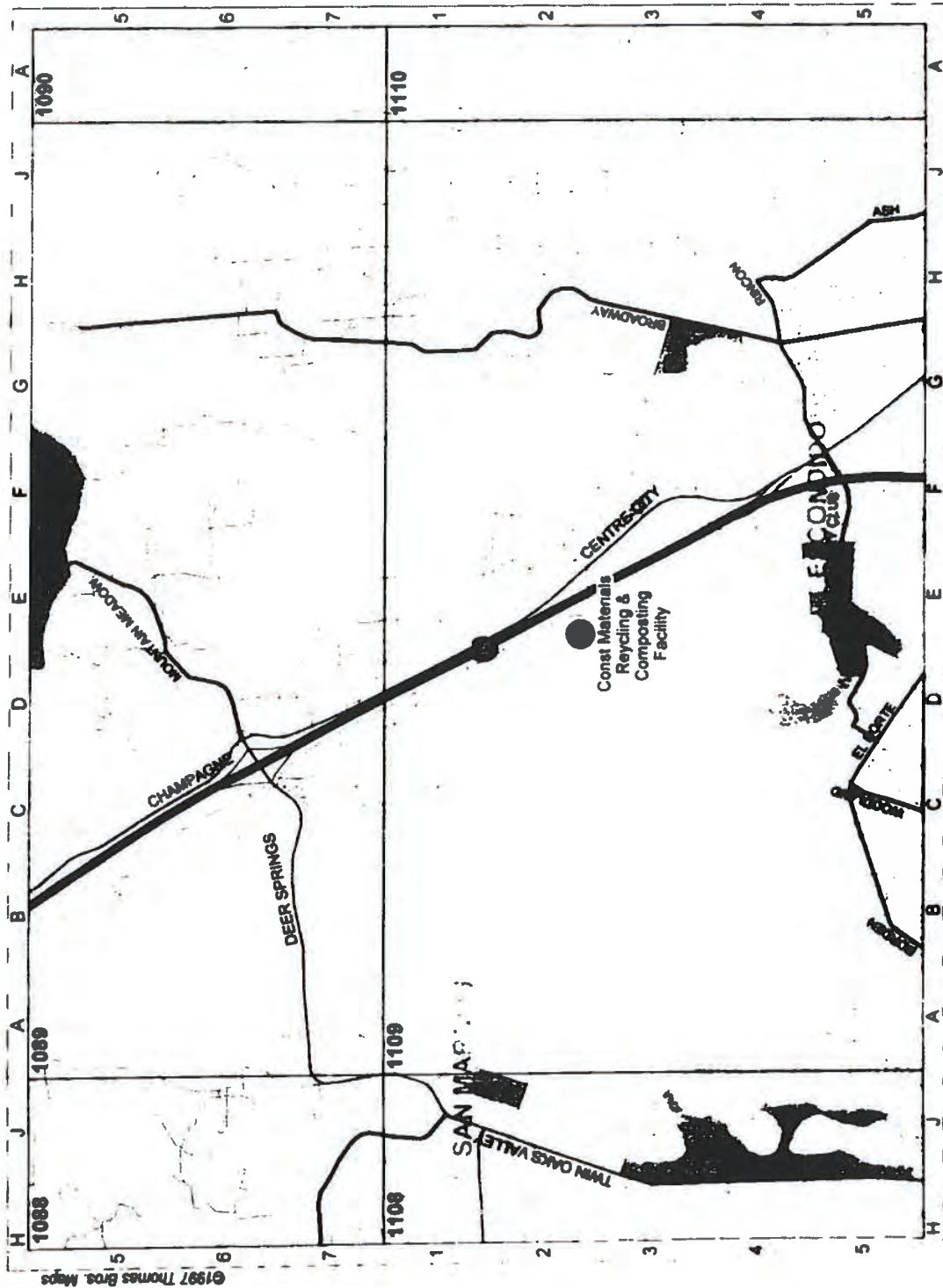
1. Central location to the North County Cities.
2. Located on a major transportation corridor (I-15) just south of the Deer Springs/Mt. Meadow Interchange. This interchange will be vastly improved as projects in the pipeline in Mountain Meadow and the Twin Oaks Valley areas are approved.
3. Located on Mesa Rock Road a sparsely trafficked frontage road providing access from the north and south.
4. Easy access from Escondido, San Marcos, Vista, Carlsbad, and Oceanside via route 78 direct to Center City Parkway and then north with a left hand turn on Mesa Rock Road underneath freeway 15 direct to the site.
5. Complete lack of visibility of the site from any direction as the south, north and west sides are high ridge lines completely hiding the site. The site sits high above the freeway and an east berm with trees will completely hide the east side of the project from homes 1.5 to 2 miles to the east across the freeway.
6. No noise concerns because of the ridge lines on all three sides, the masking sound of the freeway on the east side, lack of residential neighbors and Mr. de Jong's buffering created by three other parcels of land he owns contiguous to the west and north.
7. Isolated enough to prevent odor problems and located just high enough and north of the Escondido air basin to lessen odor effects.
8. Relatively benign environmental site as a minimal amount of coastal sage habit on the 35 acres was destroyed many years ago by CALTRANS when the freeway was built.
9. Minimal grading to prepare the site as the 35 acres was partially graded by CALTRANS years ago. The only other grading of significance will be improving the existing access road.
10. A site that could be fast tracked and brought on line quickly and addresses a County wide problem.
11. Helps satisfy a 49 acre industrial lands shortage in the Twin Oaks Valley area.

I and/or Arie de Jong are available if you would like to tour the site prior to the hearing of May 11, 2005. I can be reached at (760) 737-9007. If you have questions of County Staff I would suggest you contact Wayne Williams of the Solid Waste Division at (858) 874-4108 as he has seen the site and is the Counties resident expert on trash.

As a summary of the merits, this is a perfect site for this facility because of central location, easy transportation access, isolation, complete lack of visibility and minimal environmental impact. I cannot think of a more perfect location. Recycling at this facility will lengthen the life of all of our landfills, allow us to recycle our man made products and our green waste, and help us meet the Industrial Land deficiency currently existing in the Twin Oaks Valley area.

Sincerely,


David R. Shibley



● Const Materials Recycling & Composting Facility Page & Grid 1109 E2





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Assembly California Legislature

MARK WYLAND
 ASSEMBLYMAN, 74TH DISTRICT

COMMITTEE ASSIGNMENTS
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 AND PREPAREDNESS
 HIGH PRIORITY SCHOOLS
 WORKFORCE INVESTMENT
 GASOLINE COMPETITION,
 MARKETING & PRICING
 JOINT COMMITTEE:
 DEVELOP A MASTER PLAN
 FOR EDUCATION

March 3, 2005

Supervisor Bill Horn
 1600 Pacific Highway, Room 335
 San Diego, California 92101

Re: Compliance with California State Assembly Bill 939

Dear Supervisor Horn:


On Friday the 18th of February 2005 Mr. Arle de Jong accompanied by David Shibley visited my office and presented information on what appears to be an excellent site for construction of a combination construction material recycling facility and green waste composting facility.

Placement of this facility would require a zone change from residential to heavy industrial and the opportune time to accomplish this zone change would be as part of the General Plan 2020 update currently in process.

As an assemblyman I do not ordinarily get involved in specific projects or land use decisions; however I am sure you are aware of the state mandated requirements of AB 939 and the fact that in certain areas of the County the fifty (50%) percent landfill diversion requirement is not being met.

Mr. de Jong seems to have a very suitable site in a central location and I would appreciate any assistance your good offices could provide him with his zone change request. I have also forwarded similar correspondence to each Planning Commission Member in preparation for a Planning Commission Hearing of March 4, 2005 concerning this zone change request.

Sincerely,


 MARK WYLAND
 Assemblymember, 74th District

Representing the communities of: Carlsbad, Del Mar, Encinitas, Escondido, San Marcos, Solana Beach, Vista and portions of Oceanside
 Printed on Recycled Paper



Wednesday February 09, 2005

editor@sddt.com

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San Diego ordinance aims to raise amount of recycled material

By Ryan Moore, The Daily Transcript
Wednesday, February 9, 2005

Businesses, especially construction, could bear a greater share of San Diego County and city's recycling responsibility in the coming months. And tougher policy measures for residents aren't far behind. Both the county and city are currently working out the details of construction and demolition ordinances that proponents say would help San Diego meet and maintain state garbage mandates, avoid large fines and extend the life of its landfills.

As part of a state law, all jurisdictions in the county are under mandate to reduce, reuse and recycle at least 50 percent of its garbage or face fines of up to \$10,000 a day. San Diego was granted an exemption after failing to meet that standard in December and has until the end of this year before it could again face fines.

The state's most recent results, from 2002, show that San Diego recycles 44 percent of its waste.

"This is a real way to assure that not only will the jurisdictions get 50 percent recycling, but they're going to be able to maintain it," said Wayne Williams, recycling program coordinator for the county. "We've got a population explosion going on right now, and it's very important were recycling more and more tonnage all the time just to keep at 50 percent."

The City Council told city workers in December to draft a mandate for recycling construction debris, even though an advisory committee that included building interests had proposed a voluntary program. Williams said once the city was mandated, a number of other jurisdictions jumped on the bandwagon.

Williams, who is heading the ordinance draft plan for the county, said other cities like Chula Vista and Oceanside implemented mandatory recycling programs years ago, and have had successful results. He noted that the county and city's plan will be uniformly structured to those existing plans to make the transition easier and more efficient.

Some details of the county's plan, which are still subject to change, include making projects of 40,000 square feet or greater subject to the ordinance; the mechanism for financing would be either a bond or cash, and to make sure builders recycle, they would receive a prorated percentage of money back for the amount of waste they recycled.

Williams said the plan would probably be brought before the county board by the end of March, and it would be implemented in stages, although this is all subject to change.

According to Leah Bowder, deputy director for the city's Environmental Services Department, the city will probably be submitting a commodities plan to the council toward the end of the summer. The residential/commercial plan, which will impose similar recycling requirements for green-waste, was halted to work on the construction and demolition ordinance.

As for the construction and demolition ordinance plan, concerns are being raised by some businesses regarding the details -- such as what materials will be subjected, and whether or not the city and county actually have the infrastructure to implement such a mandate.

"Our concern is that if they make this a mandatory requirement yet do not have the facilities to accommodate the debris what do we do," said Matt Adams, Building Industry Association representative. "It takes time to get facilities like that online."

Adams said his organization is also concerned with the fact that the city wants to implement the ordinance even though it is in the process of calculating its baseline results regarding whether they met the 50 percent standard. The BIA recognizes the importance of recycling, Adams said, but they want a fair and reasonable plan and are requesting that the city build a new facility before approving the ordinance.

According to Williams, the county and city have announced that they want to build a construction and demolition mixed recycling facility in Miramar, and that the request has already hit the streets and is being negotiated.

"We really don't want to put an impediment in any way on businesses," Williams said. "We have taken [builders'] suggestions into consideration completely. We're here to help serve the community and the economy, and by

.. working with [builders] we can come up with a good solution."

Williams said a recycling program such as the one he is drafting is essential for extending the life of its three landfills. The city estimates that the Miramar landfill -- which primarily receives city waste -- would run out of room by 2012 at the current rate of about 9 million pounds a day.

Construction and demolition materials -- such as cement and lumber -- weigh a lot, making it an easy source of removing "tonnage" of waste, Williams said. In addition, materials like concrete can be grinded up and used as base material for roads, something he feels contractors will reap the benefits of.

S.D. plan targets construction waste in landfills

Deposit would be returned if material is properly recycled

By John Lee
STAFF WRITER



Construction debris, as seen by a curb at the 48 Ranch development near Rancho Bernardo, has begun to clog regional landfills. Scott Lomeli / Union-Tribune

PUBLIC HEARINGS

What session by San Diego's natural resources committee to discuss a proposed recycling mandate for construction and demolition debris? When: 9 a.m. tomorrow. Where: 12th floor of city administration building, 222 S.

City officials want to create a financial incentive for recycling building materials — the largest segment of the city's garbage — akin to the state's deposit program for bottles and cans. Scales are high at City Hall, where business leaders are expected to show up in force to

is modeled after a program in San Jose that has spawned several similar ordinances in the Bay Area. A committee sign-off would send the measure to the City Council for a vote, likely in May or June.

LANDFILL REVISE
For the city of San Diego in 2000 (latest data available).



SOURCE: City of San Diego
NAT'l BUREAU / UNION-TRIBUNE

SEE WASTE, A6

WASTE Exempt projects would include decks, carports

mayor to push for a voluntary system instead of a mandatory one. Garbage officials across San Diego County are watching to see how the city handles the proposal.

Dennis Turbey, who oversees the county's recycling program, said county leaders haven't settled on their approach yet.

"We want make sure that we are consistent with all the other jurisdictions because if you are a developer... you don't want to have different rules in different places," she said.

An ordinance, San Diego's recycling mandate would apply to construction, remodeling and demolition projects starting in 2006. Deposits would be paid when applying for a city permit.

For example, a roof job that includes tearing off old roofing material would be charged a flat fee of \$100. New construction would be charged 30 cents per square foot, or \$400 for a 2,000-square-foot home.

Exemptions would include decks, carports, pools and some plumbing and electrical work.

"It's really not that much time or effort if you are going to try to do something to preserve the quality of life here in San Diego," said Kip Shindoren, the city's deputy director of waste reduction.

The deposit system continues to draw opposition from various quarters, just as it has during the last few years of being tested, around by city officials. Contractors call it punitive. Government watchdogs want an audit of the city's recycling fund before backing a new fee. Business leaders said it is a painful tax that will scare residents away from applying for building permits.

"It's creating a bureaucracy around trash recycling," said Cindy Bonadino, chairman of the San Diego Regional Chamber of Commerce's infrastructure committee.

The chamber is urging the council to step up an educational campaign about recycling. It also wants San Diego officials to open a recycling facility for unwanted construction and demolition debris, commonly called C&D, before they consider a compulsory program.

"Using the 'carrot approach' of educating people and providing economic incentives will

An official audit and report in San Jose, where residents are the strongest in the state when it comes to recycling trash in the landfill. San Jose in 2001 became the first big city in California to mandate recycling of construction waste, which made up about a third of its garbage.

Stephen Randall, San Jose's commercial recycling manager, said the deposit program provided a steady stream of materials for recycling companies, which helped boost the city's recycling rate about 3 percentage points.

"To us, it's important that San Diego be the largest and most comprehensive city that it is when it comes to recycling," he said.

El Cajon recycler Perich Corp. disagrees.

A study of used carpet and other recyclable materials, he said, is part of a city's infrastructure. It is a responsibility that should be shared with the business community.

The state officials say San Diego's mandate of mandating recycling is a "very important step" to take in the state's recycling program.

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of \$10,000 a day — though such penalties are unlikely as long as cities shows progress. San Diego has until the end of the year to reach the standard or at least prove that it is making a solid effort.

From Santa Rosa to Chula Vista, cities increasingly are looking at ways to regulate construction and demolition debris. The waste makes up about 22 percent of California's waste stream, nearly double the level in 1996. The state estimates the increase to increased housing development.

C&D debris is one part of the waste stream that has been a headache for cities in the past. People to start monitoring and trying to get rid of the last 10 years, San Jose, San Diego, and other cities have started to take a more aggressive approach to waste management.

Yosemite Recycle, a part of the League of Cities in California, said the ordinance would help the organization monitor and enforce the rules. CAD waste reduction has been a goal for many years, but it is now a mandate to act.

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"Using the 'carrot approach' of educating people and providing economic incentives will

City staff recommends phasing in the policy to allow time for construction of a facility where building debris is sorted. The city is awaiting bids by companies to build the structure for use next year.

San Diego garbage officials estimate that nearly 400,000 tons a year of mixed construction debris — items such as Sheetrock, carpet, wood and concrete — end up in the city's Miramar Landfill. Roughly 200,000 additional tons of construction and demolition waste from inside the city is dropped in other landfills.

San Diego's recycling rate is a high of 46 percent in 2003 to 48 percent in 2004, which is better than most cities, but still far from the goal of 60 percent.

A study is under way to measure how the city's recycling rate compares to other cities, including San Jose, and a big recycling rate has been set as a goal.

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Perich Corp., shows yesterday recycling carpet, to promote voluntary recycling program.

get better results than going to incinerators, landfilling and the chamber's public policy chief, said in a February letter to City Council.

Contractors already recycle large volumes of concrete and asphalt, which is crushed and reused for road building, along with other materials that have widely accepted, said Randall.

Bureau of the Associated General Contractors offer to be San Diego Recycling has become

the city's recycling rate is a high of 46 percent in 2003 to 48 percent in 2004, which is better than most cities, but still far from the goal of 60 percent.

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The San Diego Union-Tribune • Thursday, April 14, 2005

Mandatory recycling plan advances

Construction waste cutback is S.D. goal

By Mike Lee
STAFF WRITER

San Diego's disputed plan to start a mandatory recycling program for construction and demolition debris moved yesterday to the City Council, which is expected to vote on it by June.

The city is under pressure to divert more garbage from its Miramar Landfill or face possible state fines of \$10,000 a day.

"(San Diego) has got to do something to protect itself," said Councilman Brian Maleschian, chairman of the City Council's natural resources committee.

After two hours of testimony and discussion, the committee ordered that two options for reducing landfill-bound debris from construction and demolition projects be presented to the council. San Diego's decision will set the tone for the region, in which several cities and the county government are trying to boost recycling of building materials.

The original proposal, offered by city staff, would force payment of a deposit with building and demolition permits starting in January. The money — a few hundred dollars for many projects — would be re-

turned when builders or residents proved to the city that they had recycled or reused project debris.

A new option the committee requested yesterday would launch the deposit program only after a facility is built to accept unsorted materials from construction and demolition projects. A city-backed sorting facility at Miramar is expected to be finished next year.

The committee was split on the strategy to collect deposits starting in January. Councilmember Jim Madaleno said the sorting facility needs to be in place before the city forces homeowners and contractors to fill out forms and pay deposits.

"This ordinance may be the right ordinance, but it's at the wrong time," he said.

Councilwoman Donna Frye said the city has had 15 years to try voluntary programs since the passage of the state's landmark recycling bill.

"It's time to get serious," she said. "This (ordinance) will help get it done."

Each year, San Diegoans toss about 500,000 tons of construction and demolition debris — commonly called C&D — into Miramar and several regional landfills. C&D debris makes up 35 percent of the city's total waste stream.

The tenor of yesterday's meeting suggests the council

will decide on the deposit program this year, rather than waiting until it gets new data about the city's recycling rate.

"San Diego needs to do it. I think the council is finally brave enough," said Richard Anthony, who sits on the San Diego Association of Governments' citizens advisory committee on waste management.

Approximately 20 people testified about the deposit system. Business interests, including the Building Industry Association and the San Diego Regional Chamber of Commerce, oppose a mandate. They asked the city to step up an educational campaign to make contractors aware of recycling opportunities.

"I think you need a little more faith in your citizens ... and a little less faith in bureaucracy," said Matthew Adams, government affairs chief for the builders association in San Diego.

Environmentalists and waste officials from other jurisdictions urged the committee to take a leadership role for the region.

"It's the next logical step in trying to manage our waste stream," said Lynn France, conservation coordinator for Chula Vista.

Much of yesterday's discussion centered on how cash-strapped San Diego could avoid state recycling fines, which

Recycling proposal

Key elements of San Diego's plan for recycling construction and demolition materials:

- People applying for building or demolition permits would pay a deposit to the city based on project size and type. Pools, decks, carpets, fences and certain small-scale jobs would be exempt.
- Applicants would document their recycling by using city forms, receipts from recycling facilities, written statements and/or photos.
- The city would determine if the applicant earned a refund. Refunds would be prorated for partial recycling.
- If applicants don't request a refund within 180 days, the city would keep the deposit and place it in a fund for waste reduction.

might be levied if the city fails to recycle 50 percent of its waste by year's end.

The city's recycling rate dropped to 45 percent in 2003, the most recent year with official data, down from a high of 48 percent in 2000.

Eugene Tweng, an Aguana Hills waste consultant who is updating San Diego's recycling data, told the council it's uncertain that his study will show the city is doing better than previous studies indicated.

He urged the city to adopt the recycling ordinance.

"It's really very minimal at best," Tweng said. "But it's a starting point."

Sakdarak, Souphalak

From: Bill Martin <bmartin@escondido.org>
Sent: Thursday, December 05, 2019 10:34 AM
To: Neufeld, Darin
Cc: Sibbet, David; Slovick, Mark; Sakdarak, Souphalak
Subject: RE: [EXT] RE: NCER Comments

Thanks, Darin. I really appreciate the update and future notifications.

Best,



Bill Martin
Director of Community Development
Community Development Department | City of Escondido
Direct: 760-839-4557 | Mobile: 760-270-4345
www.escondido.org

From: Neufeld, Darin <Darin.Neufeld@sdcounty.ca.gov>
Sent: Thursday, December 05, 2019 10:29 AM
To: Bill Martin <bmartin@escondido.org>
Cc: Sibbet, David <David.Sibbet@sdcounty.ca.gov>; Slovick, Mark <Mark.Slovick@sdcounty.ca.gov>; Sakdarak, Souphalak <Souphalak.Sakdarak@sdcounty.ca.gov>
Subject: RE: [EXT] RE: NCER Comments

Hi Bill,

Dave Sibbet asked me to reach out to you with a status update. Dave is with the Fire Authority now, so please feel free to contact me directly in the future. We are reviewing all the public comments received during the disclosure period. This will take us at least a month or so to complete. We will let you know when we get closer to a Zoning Administrator public hearing, which is the next step in the process. After that hearing, the Director of Planning & Development Services will make a decision to approve, approve with modifications, or deny the Site Plan for the project. That Director's decision is appealable to the Planning Commission.

I've include Souphie on this chain so that she can make sure we have your email in our files for future notifications.

Please let me know if you have any additional questions.

Thanks,

Darin

Darin Neufeld, AICP | Chief | Project Planning
COUNTY OF SAN DIEGO | Planning & Development Services
5510 Overland Avenue | Suite 310 | San Diego | CA | 92123
T. 858-694-3455 | M. 619-753-5439 | F. 858-694-3373 | MAIN 858-694-2960
PDS Website <http://www.sdcounty.ca.gov/pds/index.html>

From: Bill Martin <bmartin@escondido.org>
Sent: Thursday, December 5, 2019 9:45 AM
To: Sibbet, David <David.Sibbet@sdcounty.ca.gov>
Subject: RE: [EXT] RE: NCER Comments

Hi David-

Can you provide a brief update on the status of this project?

Thank You,



Bill Martin
Director of Community Development
Community Development Department | City of Escondido
Direct: 760-839-4557 | Mobile: 760-270-4345
www.escondido.org

From: Sibbet, David <David.Sibbet@sdcounty.ca.gov>
Sent: Monday, October 14, 2019 5:07 PM
To: Bill Martin <bmartin@escondido.org>
Subject: [EXT] RE: NCER Comments

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender email address AND know the content is safe.

Thank you for your comments. This email is a confirmation that they have been received.

DAVID SIBBET, Planning Manager
COUNTY OF SAN DIEGO | Planning & Development Services
5510 Overland Avenue | Suite 310 | San Diego | CA | 92123
T. 858.694-3091 | F. 858.694.3373 | MAIN 858.694.2960
PDS Website <http://www.sdcounty.ca.gov/pds/index.html>
PDS Mapping Service <http://gis.co.san-diego.ca.us/>

From: Bill Martin <bmartin@escondido.org>
Sent: Monday, October 14, 2019 2:33 PM
To: Sibbet, David <David.Sibbet@sdcounty.ca.gov>
Subject: NCER Comments

Good Afternoon Mr. Sibbet-

Please accept the attached comment letter from the City of Escondido regarding the proposed CEQA Exemption for the North County Environmental Resources Project. We appreciate this opportunity to comment on the proposal. Please contact me if you have any questions.

Thank You,



Bill Martin
Director of Community Development
Community Development Department | City of Escondido
Direct: 760-839-4557 | Mobile: 760-270-4345
www.escondido.org

David Sibbet, Planning Manager

County of San Diego- Planning and Development Services

Mr. Sibbet:

I am Owen R. McCoy, a resident of Woodridge area, just north of the now defunct Escondido Country Club, situated above the uppermost section of Golden Circle Drive, off of Barbara Drive. The planned development of the Country Club Golf Course has begun, which will bring 360 or so homes into the area, with it's huge growth of traffic and congestion.

Today, the mail delivery brought this alarming news of a proposed 139 acre industrial site to be built on the hill above my and 135 other homeowners residences. I must admit I am not familiar with all the requirements of Environmental Impact Studies, Proposed Exemptions, CEQA mandates and other items in the letter. However, when looking out my kitchen window, one concern is easily seen.

Resting on the hilltop near where "Bear Rock" is situated, and on a huge amount of the slopes below the hilltop are countless numbers of large rocks, just waiting for some disturbance (dynamiting?) to come bounding down the hillside into our retirement community. Small rocks, refrigerator size, up to huge boulders the size of a city bus, could come down and literally crush our homes and our lives. Certainly, a magnitude 6 or 7 earthquake could conceivably do the same thing, but it seems ridiculous to tempt fate.

The proposed concrete crushing facility would also produce noise (5:00 AM to 7:00 PM??) which would destroy our quiet style of life. Additionally, since the law of gravity would ensure that dust and dirt from this facility would roll down into our homes, my life would be terrible since I am married to a clean freak wife, who would be dusting several times a day!

Now, let me reflect on the financial impact on us homeowners. This industrial site is going to have a huge effect on the resale values of our homes. Who is going to pay good money to buy a home awash in dirt, dust and noise, with the fear of a

runaway rock coming down and destroying a home? This, paired with the reduction of home value due to the addition of the 360 or so homes on the golf course, will be devastating to us.

I urge the Planning and Development Services Department to seriously reconsider this development.

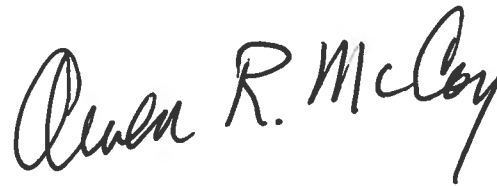
Owen R. McCoy

1727 Doral Glen,

Escondido, CA 92026-1068

760-781-3778

ormmac@aol.com

A handwritten signature in black ink that reads "Owen R. McCoy". The signature is written in a cursive style with a large, stylized "O" at the beginning.

Date: _____

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

I live an area that will suffer significant impacts from the proposed North County Environmental Resources project (Project). I submit this public comment letter concerning the proposed section 15183 exemption ("Proposed Exemption") as the County of San Diego ("County") should require the applicant, Hilltop Group Inc. ("Applicant"), to prepare an Environmental Impact Report ("EIR") for the Project due to its foreseeable significant environmental impacts which will impact my family's and my community's health and well-being. I am dismayed that the County, having determined in 2015 that the Project requires an EIR, now proposes to fast-track environmental review of the Project through an unsupported and inapplicable exemption to limit public participation contrary to CEQA's requirements.

It is inappropriate for the County to base proposed findings supporting the Proposed Exemption on technical reports, many of which are five to ten years old and do not reflect existing baseline conditions, and others which are explicitly drafts or preliminary in nature. The alleged findings of these unreliable reports do not support the necessary findings for the Proposed Exemption. Moreover, many of the technical reports speciously limit their analysis to how the Applicant says it will operate the Project instead of analyzing the Project's maximum permitted use, thereby minimizing the Project's impacts by violating CEQA's mandate that a project's foreseeable environmental impacts be analyzed on its maximum use. An EIR is needed to ensure that these concerns are addressed and so there is public transparency for this highly-controversial project.

The peculiar presence of an industrial processing facility largely surrounded by residential areas will be disruptive and have myriad significant environmental consequences on nearby residents, including:

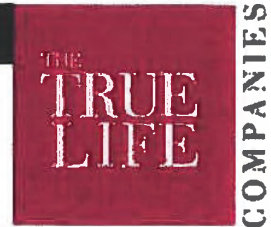
- Particulate emissions from demolition and leveling on mountain side as well as from operation of crushing and grinding and material handling equipment outdoors.
- Noise from explosive blasting during construction phase and then the operation phase of crushing and associated equipment on site.
- Operating hours of 5:00 AM - 7:00 PM, 6 days a week contrary to General Plan Policy N-5.2.
- Noise and dust from fully loaded trucks entering and leaving site through Mesa Rock Road, Center City Parkway and the Deer Spring overpass.
- Community is burdened with monitoring and reporting violations including gas emissions, noise, dust, or truck loads in and out. Monitoring equipment not included in project.
- Excessive grading of an iconic hill and rock known by residents with affection as Bear Rock.
- A facility to be perched on high level grade in view of over 6100 residents.

I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, _____

Print Name, Owen R. McCoy Address, 1727 Doral Glen

Escondido, CA
 92026-1068



September 24, 2019

Mr. David Sibbett
Planning & Development Services
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, CA 92123

**RE: North County Environmental Recycling Project
PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012**

Dear Mr. Sibbett:

This letter is written to inform you of significant concerns in regards to the proposed recycling facility currently being processed by the County of San Diego, known as North County Environmental Recycling, with County project number PDS2008-3500-08-015.

Our company, in partnership with other entities, owns the High Point residential project, which was processed as City of Escondido Tract 683-J and is adjacent to the proposed site of the North County Environmental Recycling project. The High Point project includes residential homesites adjacent to the western property line of certain parcels included in the NCER project site.

We have concerns regarding the proposed location, noise, operating hours and screening proposed for the NCER project and site. We believe the NCER applicant has not provided adequate analysis regarding the effects and potential impacts of the proposed industrial activity on nearby existing and proposed homes. We urge the County to require additional investigation, and if necessary, require revisions to project elements in order to mitigate for impacts associated with these concerns.

The NCER project includes plans for an industrial-scale recycling operation which will involve trucking; heavy equipment onsite such as bulldozers, tractors and loaders; loading and unloading of raw and finished products; and potentially heavy machinery to process raw materials received for processing at the site. The project description suggests operating hours of 5 am to 7 pm, Monday through Saturday. The project materials describe screening and landscaping of the facility from the I-15 freeway.

We are concerned that a project of this intensity which will rely on trucking, heavy equipment and machinery for daily operation, and will generate noise, particulate matter and other impacts beyond what has been considered in project analysis and County CEQA assessment materials.

The suggested operating hours would allow the operation to commence activities at 5 am Monday through Saturday, which is not compatible with homes nearby where residents may likely still be sleeping on most days at that hour. Trucks arriving as early as 5 am will likely generate noise through the inevitable realities of trucking operations such as jake braking or air brake releases. Heavy equipment used for operating the facility as early as 5 am could be started up, allowed to idle, reversed setting off warning beepers, or placed into full operation.

SOUTHERN CALIFORNIA DIVISION

949-645-5370 | 2942 Century Place Suite 121 | Costa Mesa CA 92626 | TheTrueLifeCompanies.com

Grinding of tree and plant debris, and the processing crushing and grinding of concrete are all activities which can be expected to be performed by heavy machinery producing emissions, with significant amounts of dust being generated for the entire duration of operations each day the facility is open for business. Project materials do not adequately consider the effects of releasing dust and particulate matter into the air in a location with both existing and proposed homes nearby. Mitigation measures do not appear to be adequate to reduce the effects of dust generation to a level below significance, for other nearby owners and uses.

County analysis appears to rely on a County-wide sum of the net effects. This may not be appropriate methodology; reduced emissions of trucking along the I-15 freeway may well improve air quality for communities lining the freeway, but does not mitigate the generation of increased emissions at the location of the proposed project, where residents living nearby may have to live with the ill effects of additional particulate matter and emissions from equipment and trucking.

Project materials disseminated through County website links appear to provide discussion of screening of the project from the I-15 freeway, based on that freeway's classification as a scenic corridor. However, we are not convinced that adequate attention has been given to screening this industrial use from nearby and adjacent residents.

Last of all, we do not see a good system of controls in place to ensure the operator's ongoing conformance with mitigation measures and operating restrictions. We do not think a one-time approval is sufficient to ensure ongoing operational conformance, and we recommend an approval with a renewal cycle be implemented to ensure ongoing adherence to restrictions. We suggest a Conditional Use Permit with a periodic renewal requirement timeframe to ensure ongoing conformance.

We urge the County to take steps to further analyze the areas of concern listed in this letter, and request follow up communication to inform us of discussions and potential resolutions.

We would prefer to resolve these matters in advance of a public hearing at which project approval may be considered, but in the event our concerns are not adequately addressed, TTLC Calwest LLC reserves the right to further pursue resolution of these concerns through legal means as may be available through the public hearing process.

Please direct future notices regarding actions or hearings regarding this project to:

Mr. Rob Filton
The True Life Companies
2942 Century Place, Ste 121
Costa Mesa, CA 92626

TTLC CALWEST, LLC
By: TTLC Management, Inc., Its Manager



Scott Menard, Executive Vice President

cc: Rob Filton, TTLC
Lloyd McKibbin, CWC

3-825

Oct 5, 2019

David Sibbet
Ste 310
County of San Diego, CA 92123

Re: Construction of Debris Recycling Facility
North County San Diego west of I-15

Sir:

I oppose this project.!

Willa Mills

Willa Mills
1447 San Carlos Pl
Escondido, CA 92026

Sibbet, David

From: Basha <svbasha@aol.com>
Sent: Friday, October 04, 2019 7:25 AM
To: Sibbet, David
Subject: Subject: North County Environmental Resources, Site Plan I-15 Review, S.O: PDS20083500-08-015, Log No.PDS2008-3910-0808012

Subject: North County Environmental Resources, Site Plan I-15 Review, S.O: PDS20083500-08-015, Log No.PDS2008-3910-0808012

To: David.Sibbet@sdcounty.ca.gov
Subject: North County Environmental Resources, Site Plan I-15 Review, S.O: PDS20083500-08-015, Log No.PDS2008-3910-0808012

David Sibbet
County of San Diego
Planning and Development Service

Mr. Sibbet:

As residents who own our homes at Deer Springs Oaks Mobile Home Park we are writing to oppose this Recycling project. We are a 55+ community and many of our residents already have respiratory issues and having so many environmental hazards nearby is a big concern for us. We request the following:

Reinstate the EIR requirement that the Planning Department established for this project in 2014
Planning Department to restrict permitted use/volume that is outlined in the initial request(4 trucks or waste per day in/ 2 trucks per day out)
Require full environmental monitoring and response measurements to be included so entire surrounding community ensured of safe guards to our health and safety.

As you can see, we're strongly opposed to this project on all levels including zone changes, air quality, noise, environmental hazards, fire plans or lack of, water and traffic.
All names listed below along with their email addresses are residents of Deer Springs Oaks and we will appreciate confirmation from you when this email has been received.

Thank you
Walker Monroe Space 18
1299 Deer Springs Road
San Marcos, California

Tim Kennedy President Montreux Homeowners Association,
67 homes to the East of the proposed project at the same elevation and higher

Learned of the Public notice just last week on the 19th. Very short notice

Our committee that last reviewed this project with a letter on August of 2014 from the Planning office stating that Hilltop will be required to have an EIR completed.

When was the decision not to require an EIR for the project and why were interested parties not told until now?

From the documents posted on your website some of the most concerning include:

- Preliminary Traffic Assessment - "The recycling center will be operational from 5:00 a.m. to 7:00 p.m. Monday through Saturday and will be operated by up to 18 employees."

Very early and late hours to run a facility near residential and will the permit include such hours to be limited?

- In the Air Quality Memorandum, it states: construction includes 132 days of blasting to regrade the hill in view of the neighborhood to change the location of 244,464 cubic yards of rock. Each blast being one per day using 2.5 tons of explosive.

This is an excessive amount of grading for any project and I find it hard to believe that it is very environmentally conscious for you to allow the whole hill to be blown up and regraded. I feel a second look should be completed to ensure that the hill is maintained and the iconic rocks that have made Escondido famous as explained in Google's definition of the area remain.

- In the Acoustical Document filed it also notes once the site is operational, wheel loaders and C&D Crushers will have a combined noise level to the East in the Residential area of 58 Dba and it does not comply with the county noise level maximum for residential of 57.5dba.

How many of you have stayed in a hotel room? I am a VP for the corporate office of Holiday Inn and we fail rooms that have A/C noisier than 55 dba.

My VP went to the site today to get some of these questions answered. He was met by a lady at the gate named Lora Lebreja.

- She said, "Carl told me that it was only recycling of green material. No cement grinders."
- Who is Carl? She said Carl was owner of Hilltop.
- She stated no blasting would occur, they were bringing in dirt.
- She also said next door the area was going to be a multimillion residential area and the folks doing the grading had a Judge shutdown the whole project.

This is very short notice to the community. We don't have clear answers or any answers to many of our questions.

We would like to request 90 days to properly engage our legal council to again review the project and prepare our most important questions and gaps in the information you should review.

Just a few include

- **Documents posted do not carry any details of the equipment to be housed on the site and the safety and fire danger that might exist**
- **Documents posted do not explain the methods of monitoring their modest claims of a maximum of 2 trucks a day of recycled material to leave the facility.**
- **In this day an age there seems for a recycling conscious company they would provide the ways they plan to monitor noise and air quality which they have not.**

Sincerely,

Your Montreux HOA Board

Tim Kennedy, President, cell 713-443-5882, tim.kennedy@ihg.com

Jack Dubord, Vice President

Kimberly Scott, Treasurer

Lisa Roner, Director at Large

Todd Frank, Secretary

September 30, 2019

Dear Mark Wardlaw:

I'm writing this letter on behalf of my friends, Byron Marler, Kasturi Rangan, and Carol Crisci that belong to the Escondido Art Association in which I'm a member. These friends have been instrumental in keeping the art association and Artists Gallery viable for many years. As president of Escondido Art Association, Byron in particular, has been a leader in the art community of Escondido for six years. All three reside in the Montreau gated community located in northwest Escondido which will be negatively impacted by the proposed recycling plant off Interstate 15.

Similar recycling plants already exist in the area, the noise and dust will be very bothersome and detrimental to their health and over 6,000 residential households will be harmed by this plant. The Environmental Impact Report must be completed and at least 90 days are needed to respond to the less intensive evaluation given this month. As a concerned friend and resident of Escondido please stop the approval of this concrete crushing plant.

Thank you,



Janice Niles,

Membership chair, Escondido Art Association

Sibbet, David

From: Sibbet, David
Sent: Wednesday, September 25, 2019 6:50 AM
To: Sakdarak, Souphalak
Subject: FW: I-15/Mesa Rock Road Toxic Recycling Plant - Complete Disaster for Community
Attachments: Twin Oaks Community Group.pdf; Toxic Recycling Plant on I-15 and Mesa Rock; Recycling Plant on Mesa Rock Rd. in Escondido

Souphie
 Below and attached letters/emails.
 Thanks

From: P.J. <rpp428@yahoo.com>
Sent: Tuesday, September 24, 2019 2:05 PM
To: Sibbet, David <David.Sibbet@sdcounty.ca.gov>; Gaspar, Kristin <Kristin.Gaspar@sdcounty.ca.gov>; Desmond, Jim <Jim.Desmond@sdcounty.ca.gov>
Cc: cmartinez@escondido.org; pmcnamara@escondido.org; jmasson@escondido.org; team10@kgtv.com
Subject: I-15/Mesa Rock Road Toxic Recycling Plant - Complete Disaster for Community

Mr. Desmond, Ms Gaspar and Mr. Sibbett:

My family is deeply concerned about the Toxic Recycling Plant that is being pushed through and literally forced down the throats of the residents in Escondido, San Marcos and surrounding areas.

- Who decided that an EIR is not required????
- Why did San Diego County accept Hilltop's own Environmental Impact? Isn't that a bit like a Rattlesnake ensuring the public that it's not poisonous?
- Why was this area rezoned from a semi-residential area to an Industrial Area, and then repurposed again?
- Who waived their magic wand to delete any monitoring of the toxins/products once the plant begins work?
- Why would SD County overlook the health and Safety of its residents?
- Why wouldn't the concerns of citizens be taken into account prior to permitting something of this nature?

There's more than a few of us that know that the Hilltop Group has their hands deep in political pockets - and it's just a matter of time before all involved will be exposed.

I would hope that you are not one of the dirty dozen profiting from this catastrophic event that will no doubt end in thousands of residents becoming ill and experiencing the variety of diseases that science has connected to toxic elements in air quality, water quality, and food quality, such as: Cancer, Autism, Alzheimer's, Parkinson's, ALS, Lou Gehrig's disease ... the list goes on.

3-831

I've attached a copy of the 2014 Letter from the Twin Oaks Valley Community Sponsor Group - it would be a good idea to re-familiarize yourselves with the content of this letter.

The public deserves more than what the County is dishing out, and "YOU" should better represent the community you stand for.

Please do the right thing and squash this insane project!

P.J. Petoscia
Escondido



Twin Oaks Valley Community Sponsor Group

P.O. Box 455

San Marcos, Ca. 92079

October 9, 2014

Maggie Loy
County of San Diego
Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

RE: North County Environmental Resources PDS2008-3500-080-015; PDS2013-BC-13-0019; PDS2008-3910-08-08-012
NOP Comments

Dear Maggie Loy,

The Twin Oaks Valley Community Sponsor Group would like to thank you for the opportunity to comment on this Notice of Preparation. As the County is aware, there has been a lot of Community involvement with this project and our Group has been following this project from its beginnings. We ask that the EIR for the North County Environmental Resources (NCER) consider the following:

1. During the General Plan update the Twin Oaks Valley Community Sponsor Group was opposed to the rezone of this site to High Intensity Industrial because the site is close to residential uses and is in an aesthetically important area along the I-15 corridor. We felt the change to High Impact Industrial was a Spot Zoning as defined by *"The granting to a particular parcel of land a classification concerning its use that differs from the classification of other land in the immediate area."* We were concerned because it appeared to be an *arbitrary, capricious, and unreasonable treatment of a limited area for the benefit of a single property owner.*
2. We ask that the EIR address the impacts of the zoning change and to provide clear legal justification for the zoning change so the public can be assured the zoning, which allows for this project, is appropriate, and the change to High Impact Industrial was done legally.
3. The EIR should evaluate at least three project alternatives that consider placing the project in existing industrial parks where these activities are allowed. Escondido, Vista and San Marcos have industrial parks zoned for the use that is being proposed

on this site. These industrial parks have been designed to accommodate the traffic, odors, noise, waste water treatment and other issues that will occur from this type of activity. In addition, due to the economic problems of the last six years, some of these parks have many large vacant buildings.

Air Quality:

- a. The EIR needs to study impacts from activities being planned for the site as well as cumulative impacts, both off site and on site of vehicular traffic that will be used to run the industrial operations. Activities such as rock crushing and unloading of material may have significant negative impact on residents. In addition, the large trucks being used to transport material to and from the site will add pollutants both from diesel exhaust and from the material being transported.
- b. Also, wind currents in the area may spread pollutants far beyond the site, negatively impacting nearby residents. The EIR should include a wind and microclimate study to look at how air borne particles from the site and from trucks being used for the operation, could impact adjacent residential properties.
- c. Many of the people who live near the site, such as those living in the Deer Springs Mobile Home Park, are elderly and likely have respiratory health issues that will be exacerbated by the airborne pollutants created by this project. The EIR should provide data identifying the different pollutants from the project, list how it may impact nearby residents and other businesses, and provide adequate mitigation to eliminate project impacts.
- d. Finally, the EIR should define what methods will be use to ensure mitigation measures are being followed. The community is experiencing problems with uncovered loads, dust, noise and speeding from trucks traveling to and from the quarry located on North Twin Oaks Valley Road. No enforcement measures are being used by the County. The public needs to be assured that there is sufficient mitigation and enforcement measures in place for the NCER project to prevent problems the community now experiences from the quarry, which is another form of high-impact industrial activity. The EIR needs to identify who will enforce these measures and prove they can do so. The EIR should study the use of a bond or other financial mechanism to pay for independent enforcement.

Will the trucks be covered when they are arriving and leaving the site? (legally they are supposed to but we need the EIR to tell us how it will be enforced).

Noise:

- a. The Twin Oaks Valley Community Sponsor Group is very concerned with the hours of operation, and why they are so long? They are from 5 am to 7 pm Monday thru Saturday. Since most business start at 7 am and close around 4:00 or 5:00 pm and the truck scales do not even open until 7 am, we are concerned independent truckers bringing material into the site will use the early hours to bypass weigh scales, and other legal requirements designed to protect the public. The EIR needs to explain this issue in detail and answer the following: What type of business will they be conducting at such an early hour? What type of noise will this generate? We are concerned this will be a real hardship for the neighbors near this project, or residential neighborhoods that will get truck traffic from this project. Will residents near the site

be listening to large trucks idling as they are staging before 5 am to enter the site? There is a noise ordinance that needs to be adhered to. It starts at 7 am.

- b. The EIR needs to address how the project will be able to adhere to the Noise Ordinance with the type of demolition such as rock crushing, blasting, etc., that they will be conducting. If the project cannot follow the noise ordinance the EIR needs to identify why it can't.
- c. The EIR should identify what the containers used for transportation of material will be made of. Will they be metal containers? The neighbors will be exposed to the constant "clanging" every time something is dumped into the containers.
- d. The EIR should consider mitigation measures such as building a sound wall and/or using rubberized road surface to help reduce noise created by the project.

Environmental Hazards:

Another concern is how hazardous waste will be handled. We have been told at past meetings that workers at the project site will be visually inspecting each load as it enters. However, this is no guarantee that hazardous materials will be missed. Who is to say that the hazardous materials are not going to be placed in the center of the load where they will not be detected. What happens if they are then detected after the load has been dumped and the dumping party has left the site? The EIR needs to identify how this will be addressed and what checks and balances will be used to ensure compliance.

Fire Plan:

The NOP states that C&D mulch can stay on site for 90 days. Our fear is for a mulch fire on site. Last year there were several mulch fires around the county and they burned for days. The EIR needs to include a discussion of how will the Fire Plan address and provide detailed mitigation measures. If one of the mitigation measures involves the use of water to keep the mulch pile cool so that it won't ignite, then the EIR should identify the amount of water needed and how that will be acquired given the ongoing drought status.

Water:

The project stands to use a tremendous amount of water. We are in a severe drought with no relief in sight. The EIR needs to study if there will be water available and how its use for this project may reduce the amount of water for other agricultural and residential uses.

Traffic:

According to the NOP, the project is only allowed two outbound trucks per day. The EIR needs to identify if this will be a single truck load or a truck with multiple beds, each carrying a load.

Other Issues:

We are concerned that this project won't be economically feasible. The EIR needs to provide a long-range business plan for the project so the public is assured taxpayers won't be on the hook should the project fail, leaving behind a site that requires millions to clean up.

Date: Oct 3 - 2019

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O:
PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

I expect the applicant to be required to submit a full Environmental Impact Report for this project as the County required in 2015. Planning and Development Service (PDS) is now using the California Environmental Quality Act Section 15183 process which is a less intensive evaluation for project impacts and does not require public input. Given the potential impact of the project on the surrounding area, I believe a full Environmental Impact Report is required.

Hilltop Group Inc. is seeking to construct a recycling plant that will process Construction and Demolition debris as well as tree trimmings and green waste at 25568 Mesa Rock Road. The presence of an industrial recycling facility in this residential area will be disruptive and have a number of negative consequences for local residents, not limited to:

- Particulate emissions from demolition and leveling on mountain side as well as from operation of crushing and grinding and material handling equipment outdoors
- Noise from explosive blasting during construction phase and then the operation phase of crushing and associated equipment on site.
- Operating hours 5:00 AM till 7:00 PM, not meeting Policy N-5.2 of the General Plan
- Noise and dust from fully loaded trucks entering and leaving site through Mesa Rock Road, Center City Parkway and the Deer Spring overpass.
- Community is burdened with monitoring and reporting violations including gas emissions, noise, dust, or truck loads in and out. Monitoring equipment not included in project.

I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I've listed other concern on back of this letter.

I also believe that the hundreds of pages of information submitted by the applicant cannot be adequately reviewed by residents in the 30-day time period allowed by your department – the comment period is closing on October 14, 2019. I request that time

period be extended 90 days from October 14, 2019.

Signed, C. N. Ponce

Print Name, Wick Ponce, Address,
632 Ray St ESCONC. Ca, CA 92026

Sibbet, David

From: Michelle Purcell <melnru@yahoo.com>
Sent: Tuesday, October 01, 2019 1:53 PM
To: Sibbet, David
Subject: Recycling Plant

Hello Mr Sibbet,

PLEASE DO NOT allow the construction recycling plant to be built on Mesa Rock Rd in Escondido, it's very near my home in the country club area and this plant will directly hurt everyone living in this area. It's considered a scenic hwy and this is the worst place to put this plant. I ask you to stop this insanity, there are other more suitable places in North County where similar things are operating and not near residential homes and neighborhoods. You wouldn't want this near your home where you raise your kids and breathe the air. Please save North Escondido from this horrible eye sore but more importantly from the toxic dust and noise, it will destroy the quality of life we pay so much to enjoy. Please stop this plant from being built on Mesa Rock.

Thank you

Michelle Purcell
1481 Los Cedros Lane
Escondido CA 92026
760-807-5036

M

3-838

Alicia Quadrozzi
27091 Lotus Pond Ln.
Escondido, CA 92026

Oct 13 2019

Mark Wardlaw
Planning Director
County of San Diego

I live just off of Mountain Meadow Rd.
(Deer Springs Rd) and I oppose the
recycling plant proposed in North
Escondido due to pollution, noise &
traffic. I have lived here in
Hidden Meadows for over 30 years
& intend to live here the rest
of my life. This impacts me &
my family & neighbors greatly!

Alicia Quadrozzi

3-839

Alicia Quachorzi
27091 Lotus Pond Ln.
Escondido, CA. 92026

Oct 13 2019

Ann Jimenez
Planning Commission Secretary
County of San Diego

I live just off of Mountain Meadow Rd
(Deer Springs Rd.) in Hidden Meadows.
I oppose the recycling plant proposed
in North Escondido due to pollution, noise
& traffic. I've lived here for 30+ years
& intend to live here the rest of my
life. This impacts me & my family
& neighbors greatly!

Alicia Quachorzi

Dear Ann Jernemy

I'm writing to let you know I am opposed
to the proposed recycling plant in N. Escondido.
I have lived here 35 years + the
pollution + traffic will be unacceptable.

Thank you
Michael Quadrozzi

Michael Quadrozzi

27091 LOTUS Pond Lane
Escondido 92026

Dear Mark Wardlaw,

As a 35 year long resident of Hidden Meadows
I'm writing to let you know I am
opposed to the Proposed Recycling Plant
in North Escondido.

Thank you

Michael Quedrozzi

Michael Quedrozzi

~~27091~~ 27091 Lotus Pond Lane
Escondido CA 92026

Date: 10-13-19

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

I live in an area that will be significantly impacted by the proposed North County Environmental Resources (NCER) ("Project"). I submit this public comment letter concerning the proposed section 15183 exemption ("Proposed Exemption") as the County of San Diego ("County") should require the applicant, Hilltop Group Inc. ("Applicant"), to prepare an Environmental Impact Report ("EIR") for the Project due to its foreseeable significant environmental impacts which will impact my family's and my community's health and well-being. I am dismayed that the County, having determined in 2015 that the Project requires an EIR, now proposes to fast-track environmental review of the Project through an unsupported and inapplicable exemption to limit public participation contrary to CEQA's requirements.

It is inappropriate for the County to base proposed findings supporting the Proposed Exemption on technical reports, many of which are five to ten years old and do not reflect existing baseline conditions, and others which are explicitly drafts or preliminary in nature. The alleged findings of these unreliable reports do not support the necessary findings for the Proposed Exemption. Moreover, many of the technical reports speciously base their analysis on how the Applicant says it will operate the Project instead of the maximum physical uses, thereby violating CEQA's mandate that the worst-case scenario be used to assess a project's foreseeable environmental impacts and wrongly allowing the reports to minimize the Project's impacts. An EIR is needed to ensure that these concerns are addressed and so there is public transparency for this highly-controversial project.

The peculiar presence of an industrial processing facility largely surrounded by residential areas will be disruptive and have myriad significant environmental consequences on nearby residents, including:

- Particulate emissions from demolition and leveling on mountain side as well as from operation of crushing and grinding and material handling equipment outdoors.
- Noise from explosive blasting during construction phase and then the operation phase of crushing and associated equipment on site.
- Operating hours of 5:00 AM - 7:00 PM, 6 days a week contrary to General Plan Policy N-5.2.
- Noise and dust from fully loaded trucks entering and leaving site through Mesa Rock Road, Center City Parkway and the Deer Spring overpass.
- Community is burdened with monitoring and reporting violations including gas emissions, noise, dust, or truck loads in and out. Monitoring equipment not included in project.
- Excessive grading of an iconic hill and rock known by residents with affection as Bear Rock.
- A facility to be perched on high level grade in view of over 6100 residents.

I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, Alicia Quadrozzi Michael Quadrozzi

Print Name, Alicia QUADROZZI Address, 27091 Lotus Pond Ln.
Escondido, CA 92026
Michael Quadrozzi

Sakdarak, Souphalak

From: Sibbet, David
Sent: Friday, November 01, 2019 9:59 AM
To: Kasturi Rangan
Cc: Neufeld, Darin; Byron Marler; Sakdarak, Souphalak
Subject: RE: NCER Project - PDS 2008-3500-08-015

Kasturi;
Answers are below.

From: Kasturi Rangan <rirangan@yahoo.com>
Sent: Monday, October 28, 2019 12:04 PM
To: Sibbet, David <David.Sibbet@sdcounty.ca.gov>
Cc: Neufeld, Darin <Darin.Neufeld@sdcounty.ca.gov>; Byron Marler <marlerstorm1@gmail.com>
Subject: NCER Project - PDS 2008-3500-08-015

David:

As I understood your comments about the "volume" of the proposed facility, when we spoke a few days ago, the site plan definition of the proposed facility is a "light" recycling facility which will ship two truck loads per day of product from the facility. You said other definitions such as "medium volume facility" which can process 174 tons per day are in the purview of the Health Department. I checked the Health section of the County website but found no information relating to this subject. I did find application related information on sand and aggregate products in the Air Pollution Control District part of the website. These applications ask for information on processing rates in terms of tons/hr and for equipment details but there is no mention of "volume of facility". I know the "volume" of facilities is defined in the California Code of Regulations section 17381.2.

Several questions now arise:

1. If the definition of "volume" of facility does not have relevance to the site plan application, why is a "medium volume facility" mentioned in the documents that were issued by your office on September 12, 2019? Because DEH classifies it as a medium volume facility in their permitting; which is different than the Zoning Ordinance classification that labels it as a light recycling facility.
2. In addition to the current documents, Beth Ehsan's letter of September 11, 2014 states on page 4 under Tonnage of Materials that the facility would be categorized as a Medium Volume Facility, regulated by 14CCR, Division 7, Chapter 3.0, Article 5.9, Section 17383.5. It also states that the daily maximum tonnage allowed is 174 tons and the on-site storage for concrete and asphalt is 30 days x 174 tons = 5,220 tons. The California Code of Regulations does confirm this definition for maximum storage. I assume that the volume of storage facilities allowed is a part of the site plan application. In fact the papers issued on September 12, 2019 say that there will be 20 storage containers 60' x 60' x 18' high. Even if we assume that each of these containers will be 75% full, the total tonnage for 20 containers works out to 32,400 tonnes which is more than 6 times the allowed maximum tonnage. Why would the site plan allow so many containers for storage? The project description has changed since 2014. We'll have to ask the applicants why so many storage containers are required.
3. Is the applicant allowed to simultaneously apply for site plan approval and for a permit to operate from the Air Pollution Control District? Or does the applicant have to sequence these applications, with the site plan approval being a prerequisite for the application for a permit to operate? The site plan comes first before any DEH and APCD permitting.

4. Does the Air Pollution District use the same CEQA section 15183 criteria to evaluate the application for the permit to operate? I am not sure how their permits relate to CEQA, but we anticipate an APCD letter shortly that we can forward if you wish.
5. Does the Air Pollution Control District use the maximum processing rate for calculation of emissions? See #4 answer
6. Is the Air Pollution Control District the authority to specify monitoring equipment for facility operations or can this also be required as part of the site plan? DEH will be in charge once operational and PDS will be in charge of enforcing the Site Plan conditions.
7. Once the facility is in operation, what is the procedure for applications for expansion. Which divisions of the County are involved in approvals? Expansion would require a Site Plan Modification which is the same process they're going through now
8. If the owner of the facility sells the facility to another individual or company, does the permit to operate and corresponding emission limits automatically pass to the new owner? Yes, it stays with the land
9. Are the applications submitted to the Air Pollution Control District available to the public, for scrutiny, if requested? See #4
10. Is it correct to assume that once a facility has a site plan approval and a permit to operate, it can continue to expand with corresponding applications to the County as long as noise, visual impact, and emissions criteria are met? No, See #7
11. Will public hearings be held on proposals/applications for expansion of facilities? It would be the same process they are going through now
12. Can decisions for expansions be appealed in the same way that site plan decisions can? Or are there other procedures? See #11
13. If a meeting with the Air Pollution Control District is needed by the public to discuss any of the above issues, who is the correct person to contact? PDS is the lead, so you would make that request through us and we can arrange.

I thank you for your understanding and patience. As you can see, it is not easy for those of us who are not familiar with County procedures to quickly grasp the details.

Kasturi.

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Date: Sept. 30, 2019

Mark Wardlaw

Director – Planning and Development Services

County of San Diego

5510 Overland Avenue, Suite 310

San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW

S.O. PDS2008-3500-08-015, LOG NO. PDS2008-3910-080801

Dear Mr. Wardlaw:

I am writing to you to express my disappointment that Arie de Jong, Hill Top Group's project – a concrete crushing plant - is being considered by you for approval, without submittal of a full Environmental Impact Report (EIR). It was my understanding, in the year 2014, that an EIR was your requirement for him to seek approval of his concrete crushing project to be located off Mesa Rock Road. I had felt that after a comprehensive EIR review, the residents near this site would be reassured that all appropriate safeguard measures would be implemented as a condition for this project to move forward or that the project approval would be denied. Safety is paramount for the ever growing residential community in this area.

I am not reassured. The draft EIR was not accepted by the Planning Department in 2015. The next revision was not done by the applicant. More than 4 years later, the broad and general findings of a county wide rezoning (GPU) EIR which is now 11 years old are being used to justify giving the green light to continue. I see or hear no definite information to make me feel comforted that the San Diego County Planning and Development Department will be monitoring what is occurring at this site. Why has it not been a condition that this facility must be indoors to contain noise, dust, and fire hazards? Why have the hours of proposed operation from 5:00 AM to 7:00 PM been allowed to stand?

If San Diego County wants this concrete crushing plant's business, surely there is a better site than one where the site is practically kissing the residential areas of the City of Escondido and adjacent as well as across from residential areas in North County.

I encourage you to do your due diligence as you seemed ready to do in 2015 when your Department determined that Arie de Jong, Hill Top Group should complete an EIR for this project before proceeding further. Why did you have a change of heart?

The history of this project is puzzling and needs some rectification. During the General Plan Update, the project applicant (the owner of the property) wanted his parcels of land rezoned to High Impact Residential. The record shows that the Twin Oaks Community Sponsor Group and the City of Escondido (as this area is in its sphere of influence) both objected because of the nature of the surrounding areas, your Department's Planning Staff advised against the rezoning, and yet the Board of Supervisors went ahead with the rezoning. In 2008 the land owner applied for a permit to install a commercial nursery. Then, in 2012, he amended the application for installation of a facility

for recycling Concrete and Demolition debris (CDI). Even though the impacts from CDI crushing are severe compared to a Nursery, the County did not inform at least 20 nearby property owners of this change as required by County rules. The residents were unaware of this project until 2013. Overall, the project applicant is being accommodated without fair consideration of the concerns of the surrounding community. A simple search indicates that there are several CDI processing facilities in the general area and throughout the County. Why do we need another one so close to a residential community? We also notice that the applicant gets extra time on every occasion when he does not respond to the County in time. After he delayed his responses on the EIR for more than 4 years, we get notified that you have changed your process for evaluation of the project, that you do not need an EIR, and that we have 30 days to respond. This seems unfair – will you give us 4 years to respond? Actually we will settle for a 90 day extension of time to respond – please grant us this extension.

Sincerely,

A handwritten signature in cursive script that reads "Barbara W. Rangan". The signature is written in dark ink and is positioned above a solid horizontal line.

Name: Barbara W. Rangan

Address: 25129 Rue De Fleur, Escondido, CA 92026.

Sibbet, David

From: Kasturi Rangan <rirangan@yahoo.com>
Sent: Saturday, October 19, 2019 6:57 PM
To: Wardlaw, Mark
Cc: Sibbet, David
Subject: North County Environmental Resources Project PDS 2008-3500-08-015
Attachments: Signed letter KR to Mark Wardlaw 10192019.PDF; Dust from C & D processing facility.PDF

Dear Mr. Wardlaw:

With reference to the subject project, I am attaching a letter in response to the Public Comments invited before Oct 28, 2019. Also attached is a photo that is an attachment to the letter. I am copying David Sibbet, Planning Manager on this communication.

Thanks in advance for your consideration of the comments that I have made.

Yours truly,

Kasturi Rangan.

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Kasturi Rangan

e-mail: rirangan@yahoo.com

Tel: 760-546-8628

25129 Rue De Fleur

Escondido, CA 92026

October 19, 2019

cc. David Sibbet, Planning Manager,

Planning & Development Services

Mark Wardlaw

Director – Planning and Development Services

County of San Diego

5510 Overland Avenue, Suite 310

San Diego, CA 92123.

North County Environmental Resources PDS 2008-3500-08-015,

LOG NO. PDS2008-3910-0808012

Dear Mr. Wardlaw:

I am writing to you to submit my comments during the Public Comment period for the subject project that is open until October 28, 2019.

The project is loosely defined and is obviously not economically viable at its “anticipated” operating rate of shipping 2 truckloads of product per day when one considers the investment that will go into developing this site and its facilities. Expansion to a large volume facility by the current owner or a subsequent one seems extremely likely with possibilities for additional downstream operations. Such simplification to obtain a permit for operation, with expansion being a very likely possibility, could be considered “piece-mealing”, a strategy well recognized for its intent to avoid extensive environmental review. Such a strategy is a disqualification for environmental approval and in this regard the project should not be permitted.

I feel that the decision by the PDS Department of San Diego County to change its methodology of assessment of impacts of the subject project from a detailed Environmental Impact Report (EIR) to the use of CEQA section 15183 is not appropriate. This project seeks to locate in a pocket surrounded by residential communities that was zoned High Impact Industrial (I-3). This in itself, is a strong reason for extensive examination of environmental impacts through an EIR rather than a simpler 15183 Check List. The EIR process that was made a requirement in year 2014 should be reinstated.

I show below in detail the various reasons that the project with its poorly defined scope, inadequate assessment of emissions, its fire hazard, lack of monitoring facilities for operations and emissions, its construction related impacts, and other shortcomings, should not be authorized in the way it is currently represented.

ECONOMIC VIABILITY

- Your documents state that the project is consistent with the analysis performed for the GPU EIR. I beg to differ. The GPU EIR states that "The County General Plan Update (GPU) establishes a blueprint for future land development in the unincorporated County that meets **community desires and balances the environmental protection goals with the need for housing, agriculture, infrastructure, and economic vitality**. This project certainly does not meet community desires; to the contrary, it would be a blight on the community. It is not economically viable and is not vital except perhaps to the applicant. It is totally obvious that the "anticipated" shipment of 2 truckloads of product per day is totally inadequate to justify the investment in this venture that includes significant roadway development, significant blasting and grading to level the site, installation of a storage building, water tank, storage bins, concrete pad, processing equipment, utility infrastructure, retaining walls, etc. The incoming material that will produce these 2 truckloads can easily be handled by several existing facilities within a 10 mile radius of the proposed project location. If there is significant revenue to be derived from acceptance of CD & I debris, then this revenue will cease in about 30 days when the maximum allowable total inventory level of materials is reached. After this, incoming as well as outgoing trucks will necessarily have to be 2 per day. If there is an unstated intent to expand to a "Large Volume" facility and perhaps incorporate downstream facilities such as concrete batching and/or asphalt production, these must be recognized upfront for proper determination of environmental impacts. Overall, it does not seem logical that the applicant would invest so much in a facility to merely ship two truckloads/day of product.

INADEQUATE DEFINITION OF SCOPE AND CAPACITY OF PROJECT

- Overall, there is much vagueness in description of the proposed operating facility and the operations to be conducted. There seems to be more emphasis on describing the building, the water tank, the parking areas etc. These might fit site plan criteria but do not feature as significant sources of emissions. The operating equipment, the operating capacity of the equipment, and the operating practices are the keys to determining emission levels, mitigation measures, and monitoring facilities to ensure that defined operating practices and mitigation measures are used on a regular basis. If an operating practice is not enforceable then the maximum rate must be considered for calculation of emissions. Was this done by the applicant? This is not clear from the lack of detail in the attachments.
 - The quality of raw material coming into the facility is not properly defined. Is it the full range of Construction and Demolition debris or is it limited to concrete and asphalt? The full range of C & D debris, by definition, include asphalt, concrete, brick, masonry, tiles, cabinets, doors, fixtures, windows, cardboard, carpet, padding, foam, ceiling tiles, dirt, drywall, landscape debris, roofing materials, scrap metal, stucco, treated/painted and untreated/unpainted wood. If such a mix of material is received, it must be sorted on receipt – the project documents do not describe how this sorting will be done and where on the site it will be done. If sorting equipment will be used these must be described.
 - There is little or no description of processing equipment other than crusher, grinder, screen, etc., in various parts of the submitted documents but not an understandable combination of equipment nor a layout showing how these will be set out and sequenced on the processing pad.
 - It is not clear whether the processing equipment are operated with electricity or with hydrocarbon fuel.
 - If the full range of C & D debris is processed, there will be a significant quantity of material to be disposed of as it will not be recyclable. What is the plan for disposal of this material? Will it be landfilled on site or transported elsewhere for disposal? As the County tracks percent diversion of C & D materials from landfills, this type of information should be mentioned in the submitted documents. If landfilling of non-recyclable materials will be done on site, this must be very clearly defined.
- There is no definition of the volume of the facility for processing wood debris through grinding and chipping. Is this also to be a medium volume facility that is defined as being allowed to process 200 – 500 tons/day?
 - What is the description of equipment to be used for this purpose and what does the layout plan of this equipment look like.
 - How will this equipment be powered?
 - Will this equipment operate at the same time as the C & D crusher and its associated facilities?

- If both these size reduction operations take place in the same processing area how is cross contamination prevented?
- Overall, it is very apparent that this facility will not be economically viable at a shipment rate of 2 truckloads/day. It is apparent that the facility would need to expand or add downstream operations that will use the materials obtained by processing C & D material. This project should not be authorized without an understanding of the various possible alternatives and considering the environmental impact of each of these alternatives. Environmental impact that is stated on the basis of an understated scope is considered invalid for this purpose - there is sufficient legal precedent to prove this point.

HOURS OF OPERATION

- The hours of operation stated by the applicant as 5:00 AM to 7:00 PM six days a week and the need for 18 employees seem totally out of proportion to the “estimated” shipment of 2 truckloads/day and receipt of 6 truckloads/day. What is the reason why these long operating hours are sought? This is another blatant example of the inconsistencies and inadequacies in the entire description of this project.

EMISSIONS FROM OPERATIONS

- Since there is no full listing of process equipment for either C & D processing or wood grinding and chipping, it is not entirely clear how the emission levels are calculated in the Dudek Report on Air Quality and Green House Gas Emissions. There is mention of processing only 20 tons/day of incoming C & D debris, the rest being wood debris. There is a statement about the proposed project receiving material that is now going to Miramar and Otay processing facilities and therefore not accounting for emissions from the same equipment that is there. This seems a bit far-fetched – claiming emission credits from facilities that have apparently not ceded any in a contractual manner. It is questionable whether this would be allowed even in a contractual manner as the CEQA requirement seems to be that PM10 emissions not exceed 100 lbs/day at the source.
- Even if we assume that particulate emissions have been calculated at the daily maximum process tonnages allowed, shown in the Dudek report as 32.35 lbs/day for PM10, there is no way that the County, without appropriate monitoring equipment, can substantially verify that larger tonnage/day has not been processed. For example, based on crusher specifications that were provided by the applicant in prior documents, the capacity of the crusher is 240 tons/hr. This could allow any of the following scenarios:

- Use of the crusher and associated equipment for 10 minutes/day to process one truck load of Concrete and Demolition debris to ship the one truck load that the applicant “estimates” to ship each day. This would be an acceptable but unlikely operating basis.
- Use of the crusher to crush all incoming C & D material, 174 tons each day. Let us presume that the PM 10 emission rate was calculated by Dudek for this rate at 33.35 lbs/day. The crusher and associated equipment would operate for less than an hour a day. This is a possible but unlikely scenario.
- Use of the crusher to crush all the incoming material for a week ($174 \times 6 = 1044$ tons) in one day which would be a mere 5 hours of operation for the crusher and associated equipment. This could be a likely operating scheme. Prorating Dudek’s PM10 emission calculation of 32.35 lbs/day possibly for 174 tons of crushing and handling per day to 1044 tons/day would now increase to an emission of 200 lbs/day of PM10 which is double the threshold limit of 100lbs/day. In fact, the facility could process 2 weeks receipt of incoming material in less than a work day with an emission of 400 lbs/day of PM10. Yet, because of lack of monitoring equipment in the scope of the project, there is no way that the County enforcement authorities would even know that such processing took place other than probing into some log book entry which does not even have a recommended standard format. Having processing capacity that is very much larger than operating rates that are “estimated” would create an unenforceable situation for County authorities and significant negative impacts for the surrounding community.
- There is a very loose definition in the documents submitted by the applicant relating to mitigation of fugitive dust emissions by use of water with vague statements about use of misting devices or use of water trucks. This use of water needs better description in terms of facilities used and the system that will be installed to provide the water at the required pressure for misting at operating equipment and at intermediate as well as product storage piles. Will the use of water be interlocked with the operating equipment in a way that the equipment cannot be turned on without water misting in action? How many water trucks will be in service? What is the capacity of each truck? Here again a lack of dust monitoring equipment leaves too much to the discretion of the operator – much dust can be released while an operator is trying to figure out why his misting devices are not working. Visual monitoring by the operator is inadequate.
- A dust management plan that requires an area resident to go to the site to read a sign that shows who to call for code enforcement is not a good plan. A simple google search shows the availability of electronic dust monitors that can be monitored and recorded by cell phones or computers rather relying on visual observations. Many such devices can be mounted at the periphery of the site at various elevations as

well as in operating area of the plant. Such technology should be made mandatory for operation of such an inherently dusty facility. The burden of monitoring the operation of the facility for violations should not be placed on the surrounding community. There should be adequate monitoring and recording facilities that allow the County enforcement officials to perform their task with more capability and evidence as opposed to a telephone call about serious dust releases that could abate by the time the enforcement officer arrives at the scene, without there being any evidence of the reported incident.

EMISSION FROM CONSTRUCTION ACTIVITIES

- Dudek's report on emissions states that 244,464 cubic yards of rock will be blasted in 132 days. Ldn Consulting Inc's report on noise analysis states that the blasted rock and grading debris will be crushed on site with a rock crusher on site for part of the time that the grading is done. They state the possible use of a Pegson Model 4242 rock crusher and that rock crushing operations are anticipated to last for approximately 2 – 4 weeks. This means that 244,464 cubic yards or about 250,000 tons of rock will be crushed in 2 to 4 weeks.

If we use Dudek's calculation of 32.35 lbs/day for normal operation and prorate it to the construction crushing period of 2 – 4 weeks, the daily emissions would be between 1660 lbs/day to 3320 lbs/day of PM10 particulate matter vs. the threshold of 100 lbs/day. How would this be acceptable?

SIGNIFICANT FIRE HAZARD

- The project site as well as the surrounding residential communities are in a High Fire Hazard Severity Zone. Many residents have recently had their fire insurances cancelled and are obtaining new coverages at much higher cost. Adding wood debris piles as well as ground and chipped wood piles as part of the proposed project, with much movement of fuel fired heavy equipment among these piles makes the fire hazard even greater.
- The California Code of Regulations # 17383.3 states that the maximum storage for wood materials – processed and unprocessed combined – is the product of 30 times the maximum amount of incoming material permitted per day. For a "medium volume" facility this would be $30 \times 499 = 14970$ tons of flammable material. Further, the regulation says that storage limits may be extended in accordance with provisions of other sections of regulations. Considering the Fire Hazard Zone in which this project is seeking to locate, the granting of a permit for wood processing should be subject to a significant hazard review. The review by the Deer Springs Fire District that is part of the document submittal is old (2012) and does not even recognize the amount of wood waste inventory to be stored at this site.

- The site layout does not show location of fire hydrants to cover the storage areas. It seems to be assumed that hoses will be used from the water tank to be able to reach all areas of the site. When there is processing equipment laid out on the site, hose coverage cannot be achieved easily or quickly because of interferences from equipment and intermediate storage piles. Fire water piping and hydrants must be made part of the project scope.
- A review or recent history of fires at recycling facilities in Southern California shows that between 2014 and 2018, there were fires at such facilities at San Marcos, Spring Valley, Lakeside, Ontario, and El Cajon. The probability of a fire at the proposed facility must be recognized as being high and be a significant factor in the permitting decision.

NOISE ANALYSIS

- In general, the noise analysis that is provided does not seem to take into account the variation in transmittal of noise with varying weather conditions. Those of us who live in the area surrounded by the project site are well aware of the variation in the noise of traffic on I-15 depending on weather conditions, with significant increase during air density increases due to fog or dampness. More work is required in this analysis.
- Electronic noise monitors should be used on the periphery of the site and within the site to allow measurement and recording of noise levels. In fact, some of the electronic dust monitors also have the capability to measure noise and thus provide this 2 in 1 feature.

VISUAL IMPACT

- There is insufficient analysis of visual impact from high elevations. There are many residential areas east of I-15 with higher elevations than the project site which have a clear view of the project site from roads. The simple facades suggested by the applicant to mask the view of the facility from I-15 will not accomplish this purpose at higher elevations.
- What will be the consequences to the project applicant if the visual impacts are not adequately addressed, or the facades do not appear as originally intended, after the project is in operation? Will County authorities shut the facility down or merely assess modest fines and issue repeated notices of non-compliance?

CAP CHECKLIST

- Item 6 a "Reduce Outdoor Water Use" is checked as not applicable. How can a facility that intends to use 2,400,000 gals/yr. of water check the NA category?

TRAFFIC

- The condition of incoming and outgoing trucks relating to release of dust on roads needs to be monitored and recorded by visual electronic devices. The truck count and truck weight should also be recorded electronically for verification and audit by county authorities. This would help authorities ensure that the facility operates within permitted limits regarding processing volume and shipment.
- The described cleaning schedule for the street entrance to the facility is inadequate. The street entrance should be kept clean on an ongoing basis.

ADDITIONAL MITIGATION MEASURES

- Placing the size reduction operations for material processing indoors would mitigate a lot of noise and dust issues. There is an example of a crushing facility in San Jose, CA (Star Concrete) that located indoors successfully.
- The need for electronic monitoring facilities has been pointed out in several sections of the comments made above. The point to be emphasized here is that the technology for such monitoring is available and has been for some time. There is no reason not to make this a requirement for a facility that is to be located in a pocket Industrial Zone in the middle of residential areas. Such monitoring devices would allow the facility to operate to meet its needs while protecting the community from known impacts and hazards and relieving them of the burden of having to report inordinate or unintended violations to County authorities. This would better serve the spirit and objectives of the General Plan Update. Lack of such facilities would be a strong reason to deny the permit. To support my argument for appropriate monitoring and recording equipment, I attach a photograph taken a few years ago of the street entrance/exit to an existing C & D recycling facility. This exemplifies the disparity between intentions to operate properly and actual site conditions.

Yours truly,



Kasturi Rangan.

Dust outside the gate of an existing recycling facility



Sibbet, David

From: Kasturi Rangan <rirangan@yahoo.com>
Sent: Friday, October 25, 2019 1:01 PM
To: Wardlaw, Mark
Cc: Sibbet, David
Subject: North County Environmental Resources Project PDS 2008-3500-08-015

From: Kasturi Rangan
 25129 Rue De Fleur
 Escondido, CA 92026

October 25, 2019

To : Mark Wardlaw
 Director - Planning & Development Services
 San Diego County
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

North County Environmental Resources Project PDS 2008-3500-08-015

Dear Mr. Wardlaw:

Further to my letter of October 19, 2019, in which I provided comments regarding the subject project, I would like to add the following comments:

I begin by showing below an extract from a letter dated September 11, 2014, issued by your office with the subject "CEQA Initial Study - Environmental Checklist Form", signed by Beth Ehsan. In page 4, the section on **Tonnage of Materials** is written as follows:

" As proposed, the NCER facility would likely be categorized as a Medium Volume CDI facility, regulated by 14CCR, Division 7, Chapter 3.0, Article 5.9 Section 17383.5. A separate permit would be required for the proposed tree waste processing: Compostable Materials Chipping and Grinding permit or equivalent permit at the time of opening. NCER is expected to ship approximately 48 tons per day (15,000 net tons annually) of finished product. The daily maximum combined tonnage of C & D wood debris and/or CDI debris under 14CCR Section 17381(t) for Medium Volume CDI facilities is 174 tons. Storage volumes vary from process and output volumes due to the maximization of process equipment. For example: if the facility receives one load per day of CDI raw materials and the process equipment needs four loads to operate, then on the fourth day four loads would be processed at once; even though the facility's average input and output reflects one load per day in and one load per day out. The processed concrete and asphalt can only remain on-site for up to one year, and on-site storage is limited to 5220 tons (174 tons x 30 days). Records of all incoming and outgoing tonnages will be maintained on-site at the administrative offices for LEA review."

I make specific reference to the wording in the paragraph above to the "maximization of process equipment". In my earlier letter, dated October 19, 2019, I had specifically discussed various scenarios of operation of the CDI processing equipment. In the "maximization" methodology described in the above paragraph, the incoming material can be stored for 11 - 12 days (1914 - 2088 tons) and processed in one day in 8 - 9 hours (at the rate of 240 tons/hr crusher capacity). The particulate emission rates shown in Dudek's Memorandum on Air Quality and Green House Gas

Emissions Assessments does not obviously consider this equipment maximization methodology. If we prorate the predicted emission rates for PM 10 particulate matter of 32.35 lbs/day to the "maximization" rate, the threshold of 100 lbs/day for PM10 particulate matter would be greatly exceeded. This is a very valid reason for not approving this project as the air quality thresholds stated by CEQA 15183 would not be met.

The release of particulate matter is a key concern not only for residents of the area but the for the County as a whole as the County is in default on air quality. Further, the most recent survey by the National Bureau of Economic Research (<https://www.nber.org/papers/w26381>), based on information from air quality monitors, shows that air quality in the nation as a whole is in decline.

Thanks for your consideration.

Yours truly,

Kasturi Rangan.

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Sibbet, David

From: Rim and Trace <macyblymer@msn.com>
Sent: Monday, September 30, 2019 1:50 PM
To: Sibbet, David; kiristin.gaspar@sdcounty.ca.gov; Desmond, Jim; Martinez, Christopher; pmcnamara@sdcounty.ca.gov; jmasson@escondido.org; team10@kgw.com
Subject: No to proposed Recovery Site

I want to register my concern over the proposed recycling recovery site at Mesa Rock.

Particularly concerned about health risks, noise pollution and traffic impact.

Michael Rimmer

Sent from Windows Mail

Sibbet, David

From: Joanne Rizza <joannerizza1@gmail.com>
Sent: Thursday, October 03, 2019 2:10 PM
To: Sibbet, David
Subject: North County Environmental Resources, Site Plan I-15 Review, S.O:
PDS20083500-08-015, Log No.PDS2008-3910-0808012

David Sibbet
County of San Diego
Planning and Development Service

Mr. Sibbet:

As residents who own our homes at Deer Springs Oaks Mobile Home Park we are writing to oppose this Recycling project. We are a 55+ community and many of our residents already have respiratory issues and having so many environmental hazards nearby is a big concern for us. We request the following:

Reinstate the EIR requirement that the Planning Department established for this project in 2014
Planning Department to restrict permitted use/volume that is outlined in the initial request(4 trucks or waste per day in/ 2 trucks per day out)
Require full environmental monitoring and response measurements to be included so entire surrounding community ensured of safe guards to our health and safety.

As you can see, we're strongly opposed to this project on all levels including zone changes, air quality, noise, environmental hazards, fire plans or lack of, water and traffic.
All names listed below along with their email addresses are residents of Deer Springs Oaks and we will appreciate confirmation from you when this email has been received.

Thank you,

Joanne Rizza
1299 Deer Springs Road . #11
San Marcos, CA . 92069
joannerizza1@gmail.com

Sibbet, David

From: Marcia Roberts <mrobe26@yahoo.com>
Sent: Saturday, September 28, 2019 7:09 PM
To: Sibbet, David
Subject: Letter of Opposition

September 28, 2010

David Sibbet, Planning Manager County of San Diego -

Planning and Development Services
5510 Overland Avenue, Suite 310 San Diego, CA 92123

Mr. Sibbet,

I am extremely concerned about the plan by Arie DeJong, Hilltop Group INC. to construct a recycling plant at 25568 Mesa Rock Road. The county had determined that a full Environmental Impact Report (EIR) was necessary in 2015. Now this project is being allowed to move forward under the Environmental Quality Act with less information about the full impact that this facility would have on our air quality, traffic congestion, increased noise pollution, and property values.

The construction of an industrial recycling center in this residential area would be extremely disruptive and have tremendous negative consequences for all the local residents. This plan is unconscionable and it does not belong in this residential area.

Adequate time is not being allowed to review the hundreds of pages of information and I request that the time period be extended to 90 days.

Additionally, I request the applicant be required to submit a full Environmental Impact Report for the project as the County required in 2015.

Marcia and John Roberts
10570 Aspen Glen
Escondido, CA 92026

Sibbet, David

From: Marcia Roberts <mrobe26@yahoo.com>
Sent: Saturday, September 28, 2019 7:04 PM
To: Sibbet, David
Subject: Letter of Opposition

September 28, 2010

David Sibbet, Planning Manager County of San Diego -

Planning and Development Services
5510 Overland Avenue, Suite 310 San Diego, CA 92123

Mr. Sibbet,

I am extremely concerned about the plan by Arie DeJong, Hilltop Group INC. to construct a recycling plant at 25568 Mesa Rock Road. The county had determined that a full Environmental Impact Report (EIR) was necessary in 2015. Now this project is being allowed to move forward under the Environmental Quality Act with less information about the full impact that this facility would have on our air quality, traffic congestion, increased noise pollution, and property values.

The construction of an industrial recycling center in this residential area would be extremely disruptive and have tremendous negative consequences for all the local residents. This plan is unconscionable and it does not belong in this residential area.

Adequate time is not being allowed to review the hundreds of pages of information and I request that the time period be extended to 90 days.

Please require that this project get more thorough and complete review. Extend the time to 90 days so that a full understanding of this project can be developed work to stop this from happening. As an elected official you are working for us and this community and our family is in complete opposition to this facility.

Marcia and John Roberts
10570 Aspen Glen
Escondido, Ca 92026

Sakdarak, Souphalak

From: Neufeld, Darin
Sent: Tuesday, December 03, 2019 3:51 PM
To: Sakdarak, Souphalak
Subject: FW: Letter of Opposition

Please include in the files.

Darin Neufeld, AICP | Chief | Project Planning
COUNTY OF SAN DIEGO | Planning & Development Services
5510 Overland Avenue | Suite 310 | San Diego | CA | 92123
T. 858-694-3455 | M. 619-753-5439 | F. 858-694-3373 | MAIN 858-694-2960
PDS Website <http://www.sdcounty.ca.gov/pds/index.html>

From: Wardlaw, Mark <Mark.Wardlaw@sdcounty.ca.gov>
Sent: Tuesday, December 03, 2019 3:19 PM
To: Neufeld, Darin <Darin.Neufeld@sdcounty.ca.gov>
Subject: FW: Letter of Opposition

From: Marcia Roberts <mrobe26@yahoo.com>
Sent: Saturday, September 28, 2019 7:17 PM
To: Wardlaw, Mark <Mark.Wardlaw@sdcounty.ca.gov>
Subject: Letter of Opposition

September 28, 2010

Mark Wardlaw, Director
County of San Diego
Planning and Development Services
5510 Overland Ave. Suite 310
San Diego, CA 93123

Mr. Wardlaw,

I am extremely concerned about the plan by Arie DeJong, Hilltop Group INC. to construct a recycling plant at 25568 Mesa Rock Road. The county had determined that a full Environmental Impact Report (EIR) was necessary in 2015. Now this project is being allowed to move forward under the Environmental Quality Act with less information about the full impact that this facility would have on our air quality, traffic congestion, increased noise pollution, and property values.

The construction of an industrial recycling center in this residential area would be extremely disruptive and have tremendous negative consequences for all the local residents. This plan is unconscionable and it does not belong in this residential area.

Adequate time is not being allowed to review the hundreds of pages of information and I request that the time period be extended to 90 days.

Additionally, I request the applicant be required to submit a full Environmental Impact Report for the project as the County required in 2015.

Marcia and John Roberts
10570 Aspen Glen
Escondido, CA 92026

-

Sibbet, David

Subject: FW: NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN I-15 REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

From: LISA RONER <lroner@cox.net>

Sent: Tuesday, October 1, 2019 9:26 PM

To: Wardlaw, Mark <Mark.Wardlaw@sdcounty.ca.gov>; Mills, Benjamin <Benjamin.Mills@sdcounty.ca.gov>; david.sibbert@sdcounty.ca.gov; Desmond, Jim <Jim.Desmond@sdcounty.ca.gov>; Gaspar, Kristin <Kristin.Gaspar@sdcounty.ca.gov>; Jacob, Dianne <Dianne.Jacob@sdcounty.ca.gov>; Fletcher, Nathan (BOS) <Nathan.Fletcher@sdcounty.ca.gov>; Cox, Greg <Greg.Cox@sdcounty.ca.gov>

Cc: pmcnamara@escondido.org

Subject: NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN I-15 REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Arie DeJong, Hilltop Group Inc. is seeking to construct a recycling plant at 25568 Mesa Rock Road. The County determined that a full Environmental Impact Report (EIR) was necessary in 2015, however; the applicant is now using the California Environmental Quality Act process to provide less information in an attempt to satisfy existing County environmental standards. Given the potential impact of the project on the surrounding area, a full EIR should be required.

The presence of an industrial recycling center in this residential area would be disruptive and have a number of negative consequences for local residents, to include:

Possible negative health consequences due to decreased air quality and a lack of monitoring of emissions from this site. There are no independent controls proposed to limit the items brought to, or delivered from this recycling center.

The applicant claims that 48 tons of material will be produced daily, and the environmental impact reports submitted are based on that level of output. The applicant is legally allowed to produce 174 tons daily, which would vastly increase impacts to the surrounding area and render their submitted environmental reports invalid.

Particulate emissions from demolition and leveling on mountain side as well as from operation of crushing and grinding and material handling equipment outdoors.

Machinery capable of delivering and processing concrete and other building materials operating between the hours of 5am to 7pm, Monday through Saturday. Noise from explosive blasting during construction phase and then the operation phase of crushing and associated equipment on site.

The operating hours: 5:00 AM till 7:00 PM, do not meet Policy N-5.2 of the General Plan

More heavily-laden trucks and passenger vehicles driving on our already burdened local roads and decreasing their serviceable life.Noise and dust from fully loaded trucks entering and leaving site through Mesa Rock Road,Center City Parkway and the Deer Spring overpass.

Increased fire danger to an already at risk fire area.

Decreased Property Values: Due to the presence of high-impact industrial activity in close proximity to our homes, disturbing noise and unknown air quality effects from this project.

High-impact industrial activity is inconsistent with the surrounding area, harmful to our interests and needs to be stopped.

Community is burdened with monitoring and reporting violations including gas emissions, noise, dust, or truck loads in and out. Monitoring equipment not included in project.

I request the applicant to be required to submit a full Environmental Impact Report for this project as the County required in 2015.

The hundreds of pages of information submitted by the applicant cannot be adequately reviewed by residents in the 30-day time period allowed by your department – the comment period is closing on October 14, 2019. I request that time period be extended to 90 days.

Additional Request For Jim Desmond:

As our new District 5 Supervisor, I would appreciate you investigating this project, the 2011 re-zoning of the applicant's property that made it possible, and the circumstances surrounding the multi-year planning process that has ensued.

Regards,

Lisa Roner
25445 Rue De Fleur
Escondido CA 92026

Sibbet, David

From: elizarosev <elizarosev@gmail.com>
Sent: Wednesday, October 09, 2019 9:17 AM
To: Sibbet, David
Subject: NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN I-15 REVIEW

SUBJ: NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN I-15 REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Arie DeJong, Hilltop Group Inc. is seeking to construct a recycling plant at 25568 Mesa Rock Road. The County determined that a full Environmental Impact Report (EIR) was necessary in 2015, however; the applicant is now using the California Environmental Quality Act process to provide less information in an attempt to satisfy existing County environmental standards. Given the potential impact of the project on the surrounding area, a full EIR should be required.

I request the applicant to be required to submit a full Environmental Impact Report for this project as the County required in 2015.

The hundreds of pages of information submitted by the applicant cannot be adequately reviewed by residents in the 30-day time period allowed by your department – the comment period is closing on October 14, 2019. I request that time period be extended to 90 days.

The presence of an industrial recycling center in this residential area would be disruptive and have a number of negative consequences for local residents, to include:

- ☐ **Health:** Possible negative health consequences due to decreased air quality and a lack of monitoring of emissions from this site. There are no independent controls proposed to limit the items brought to, or delivered from this recycling center.
- ☐ **Production:** The applicant claims that 48 tons of material will be produced daily, and the environmental impact reports submitted are based on that level of output. The applicant is legally allowed to produce 174 tons daily, which would vastly increase impacts to the surrounding area and render their submitted environmental reports invalid.
- ☐ **Noise:** Machinery capable of delivering and processing concrete and other building materials operating between the hours of 5am to 7pm, Monday through Saturday.
- ☐ **Traffic:** More heavily-laden trucks and passenger vehicles driving on our already burdened local roads and decreasing their serviceable life.
- ☐ **Decreased Property Values:** Due to the presence of high-impact industrial activity in close proximity to our homes, disturbing noise and unknown air quality effects from this project.

High-impact industrial activity is inconsistent with the surrounding area, harmful to our interests and needs to be stopped.

Inscribed on the seal of the County of San Diego are the words, "The Noblest Motive is the Public Good." I ask you, and all County government, to live up to those words. The public good is no served by such a disruptive presence as this proposed project.

Additional Request For Jim Desmond:

As our new District 5 Supervisor, I would appreciate you investigating this project, the 2011 re-zoning of the applicant's property that made it possible, and the circumstances surrounding the multi-year planning process that has ensued. It has been strongly opposed by residents and the Twin Oaks Valley Community Sponsor Group. The original plan was to open a nursery on this site, a project that would garner considerable support in the community and join the other popular commercial establishments currently operating nearby.

Best regards,

Elizabeth Rose
760 509-5400



San Diego County Archaeological Society, Inc.

Environmental Review Committee

8 October 2019

To: Mr. David Sibbet
Department of Planning and Development Services
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, California 92123

Subject: Notice of Intent to Adopt Findings
North County Environmental Resources, Site Plan I-15 Review
PDS2008-3500-08-15, Log No. PDS2008-3910-0808012


Dear Mr. Sibbet:

I have reviewed the subject notice on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained on the PDS website and, especially, the Dudek and Brian F. Smith cultural resources reports, we agree that no impacts to cultural resources are likely to occur. Therefore, we also agree that no mitigation measures for cultural resources are necessary.

Thank you for including SDCAS in the County's environmental review process.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: Dudek
Brian F. Smith & Associates
SDCAS President
File

Sibbet, David

From: Candi Salenieks <wersaleniaks@me.com>
Sent: Sunday, October 27, 2019 10:48 PM
To: Sibbet, David
Subject: NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN I-15 REVIEW, S.O:
PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Hello,

Please find the attached Letter of Opposition to NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN I-15 REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012-The North County Environmental Resources project proposes a recycling facility for wood chipping and Construction, Demolition, and Inert (CDI) debris recycling facility on located on six parcels totaling to approximately 139 gross acres. The project components include a 12,000-sqaure foot steel building, 100,000-gallon water tank, and a security trailer. The project is located along Mesa Rock Road in the North County Metro Community Planning area, within the unincorporated San Diego County. The site is subject to the Semi-Rural Regional Category and the Land Use Designation is 18, High Impact Industrial. The Zoning Use Regulation for the site is General Impact Industrial (M54). The project is consistent with the General Plan and Zoning Ordinance.

If you have any questions, please don't hesitate to contact me.

Thank you!
Merrie "Candi" Salenieks
760-271-1332

Date: 10/24/19

David Sibbet, Planning Manager

via mail and email to David.Sibbet@sdcounty.ca.gov

County of San Diego - Planning and Development Services

5510 Overland Avenue, Suite 310

San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-1
015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

I am a resident in the Montreux Homeowners Association, a community that is roughly a third (1/3) of a from, and at about the same elevation as, the site for the proposed North County Environmental Resource project ("Project"). I submit this public comment letter concerning the proposed section 15183 exemption ("Proposed Exemption") as the County of San Diego ("County") should require the applicant, Hilltop Gr Inc. ("Applicant"), to prepare an Environmental Impact Report ("EIR") for the Project due to its foreseeable significant environmental impacts which will impact my family's and my community's health and well-being. I am dismayed that the County, having determined in 2015 that the Project requires an EIR, now proposes to fast-track environmental review of the Project through an unsupported and inapplicable exemption to limit public participation contrary to CEQA's requirements.

It is inappropriate for the County to base proposed findings supporting the Proposed Exemption on technical reports, many of which are five to ten years old and do not reflect existing baseline conditions, and other which are explicitly drafts or preliminary in nature. The alleged findings of these unreliable reports do not support the necessary findings for the Proposed Exemption. Moreover, many of the technical reports speciously limit their analysis to how the Applicant says it will operate the Project instead of analyzing the Project's maximum permitted use, thereby minimizing the Project's impacts by violating CEQA's mandate that a project's foreseeable environmental impacts be analyzed on its maximum use. An EIR is needed to ensure that these concerns are addressed and so there is public transparency for this highly-controversial project.

The peculiar presence of an industrial processing facility largely surrounded by residential areas will be disruptive and have myriad significant environmental consequences on nearby residents, including:

- Particulate emissions from demolition and leveling on mountain side as well as from operation of crushing and grinding and material handling equipment outdoors.
- Noise from explosive blasting during construction phase and then the operation phase of crushing and associated equipment on site.
- Operating hours of 5:00 AM - 7:00 PM, 6 days a week contrary to General Plan Policy N-5.2.
- Noise and dust from fully loaded trucks entering and leaving site through Mesa Rock Road, Cent City Parkway and the Deer Spring overpass.
- Community is burdened with monitoring and reporting violations including gas emissions, noise dust, or truck loads in and out. Monitoring equipment not included in project.
- Excessive grading of an iconic hill and rock known by residents with affection as Bear Rock.
- A facility to be perched on high level grade in view of over 6100 residents.

I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Woodbury. I have listed some additional concerns on the reverse of this page.

Additional project concerns:

I agree with everything written in this letter. A new EIR needs to be done, but more importantly why is this project proposed for this area?

Why was this land quietly & suspiciously re-zoned as heavy industrial?

This is very counter-intuitive and that coupled with the fact that the EIR report (which seemed dubious at best) is being ignored so this project can be fast-tracked, just seems to scream impropriety and political favors. Further, nothing that the concrete recycling plant owner claims as far as number of trucks & use of the plant is even congruent with how much money he would need to invest to make the site open for his purposes. Even the decibel count claimed in the original EIR can't possibly be correct with the blasting that needs to be done, the noise of the trucks & the noise of the site work. Also, the impact of everyone around due to pollution caused by this is inexcusable. We bought our property here because it was peaceful & a great place to live. This will ruin that. This may ruin kids' health. This may ruin our property value. The government nor this plant has no right to negatively affect our & our neighbors' lives so much. If this plant is built it will be a part of holding the county & the plant accountable for all detrimental impact on our lives & property. I also believe that this project should be investigated from the re-zoning up to this point to see how something like this could even be ~~done~~ carried out.

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Sibbet, David

From: Deborah Sampson <deborahsampson@cox.net>
Sent: Thursday, October 03, 2019 7:23 AM
To: Sibbet, David
Subject: Mesa Rock Project

Dear Mr. Sibbet:

As a homeowner in the Jesmond Dene area adjacent to the proposed Mesa Rock Project, I vehemently oppose the approval of this plan. It must not go forward and I urge you to do everything possible to stop this travesty.

Deborah Sampson
25161 Jesmond Dene Rd
Escondido 92026

Sibbet, David

From: Richard Savinda <rbsavinda@cox.net>
Sent: Tuesday, October 01, 2019 4:11 PM
To: Sibbet, David

Hello,

My name is Richard Savinda and I live at 25297 Jesmond Dene Hts. Pl. Escondido 920267. I live on the other side of 15 and every weekend some people use this recycling property as a shooting range. The noise is so loud it sounds like it is in my back yard. There are many more issues with the noise this plant will create such as the pollution this plant will create. Please use all your power to stop this plant as it will be very bad for many people.

Richard Savinda

Sibbet, David

From: Richard Savinda <rbsavinda@cox.net>
Sent: Wednesday, October 16, 2019 2:51 PM
To: Sibbet, David
Subject: Recycling plant

Hello,

You are probably sick of hearing why the recycling plant should not be built and the reasons are all very good but here is the major one everyone is missing. Every weekend some friends of the owners of the property do target shooting at this site. The noise bounces off the mountain and comes directly east towards my house. They recently put up metal targets that make the noise even worse. My house is in the Jesmond Dene area and this noise is unbearable. I have called the Sheriff and since this is in the County they can do nothing. Please do what you can to stop this project as it will destroy our neighborhood. If this noise from high powered rifles makes this much noise this plant crushing rock will be unbearable. Please do what you can to stop this project.

Richard Savinda

25297 Jesmond Dene Hts. Pl.

Escondido, Ca 92026

760-480-7295

Sibbet, David

From: Melody Seekins <melodyseekins@yahoo.com>
Sent: Tuesday, September 24, 2019 2:18 PM
To: Sibbet, David
Subject: Toxic Recycling Plant on I-15 and Mesa Rock

Dear Mr. Sibbet-

No vote, no representation or comment from those that this plant will affect?? Something definitely is wrong here. Corporate greed, lined pockets, remember who you represent ????? Serious health issues, crime, safety, environment, wildlife and the people in the surrounding areas. Please listen to the comments from your constituents this evening.

Thank you,

Melody Seekins
3242 Laurashawn Lane
Escondido, CA 92026

Sibbet, David

Subject: FW: Mesa Rock Recycling Plant

From: Melody Seekins <melodyseekins@yahoo.com>**Sent:** Wednesday, October 02, 2019 11:01 AM**To:** Wardlaw, Mark <Mark.Wardlaw@sdcounty.ca.gov>; jim.desmond@sdconty.ca.gov; Mills, Benjamin <Benjamin.Mills@sdcounty.ca.gov>; Gaspar, Kristin <Kristin.Gaspar@sdcounty.ca.gov>**Subject:** Mesa Rock Recycling Plant

I am a resident in the area of the proposed toxic plant. Our family is very concerned about health issues, environmental and safety issues to name a few, concerning the construction of this plant. It is unbelievable that this could get buy without a vote from the people you represent. How does this project not need an environmental study? This whole thing smells of deceit and coverup, remember who put you in office, who pays your salary??
Lets do the right thing, please NO TOXIC PLANT FOR MESA ROCK!!!!!!!!!!!!

Melody L. Seekins
3242 Laurashawn Lane
Escondido, CA 92026



County of San Diego

MARK WARDLAW
DIRECTOR
PLANNING & DEVELOPMENT SERVICES
1500 E. AVENUE, SUITE 100, SAN DIEGO, CA 92101
www.co.san-diego.ca.gov

PLANNING & DEVELOPMENT SERVICES
1500 E. AVENUE, SUITE 100, SAN DIEGO, CA 92101
www.co.san-diego.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES
PDS2008-3500-08-015; PDS2008-3910-0808012
SEPTEMBER 24, 2019. SAN MARCOS DINING ROOM
DRAFT 15183 PUBLIC DISCLOSURE MEETING COMMENT SHEET

RE: Construction Debris Recycling Facility on
West side of I-15

Opposed to this project!!

There are many issues with this project
that have all been handled secretly and not
in the public's best interest. There are
environmental concerns, hours of operation (emissions
and noise). Ugly, disgusting plant at the north
entrance to our city. All this done without approval,
meeting, notification to the residences in the area!

Mail to:

David Stubb, Project Manager
5575 Overland Ave., Suite 210
San Diego, CA 92125

Email: David.Stubb@co.san-diego.ca.gov

FAX: (619) 594-3373

Phone: (619) 594-3061

Melody SeeKins

Signature, Date

Melody L. SeeKins

Print Name

3242 Laurashawn Lane

Address

Escondido CA 92026

City, State, Zip Code

Sibbet, David

From: debby siebert <dsiebert874@gmail.com>
Sent: Tuesday, October 08, 2019 8:04 PM
To: Sibbet, David
Subject: North County Environmental Resources, Site Plan I-15 Review, S.O:
PDS20083500-08-015, Log No.PDS2008-3910-0808012
Attachments: Scan.pdf

David Sibbet
County of San Diego
Planning and Development Service

RE: North County Environmental Resources, Site Plan I-15 Review, S.O:
PDS20083500-08-015, Log No.PDS2008-3910-0808012

Mr. Sibbet:

As residents who own our homes at Deer Springs Oaks Mobile Home Park we are writing to oppose this Recycling project. We are a 55+ community and many of our residents already have respiratory issues and having so many environmental hazards nearby is a big concern for us. We request the following:

Reinstate the EIR requirement that the Planning Department established for this project in 2014

Planning Department to restrict permitted use/volume that is outlined in the initial request(4 trucks of waste per day in/ 2 trucks per day out)

Require full environmental monitoring and response measurements to be included so entire surrounding community ensured of safe guards to our health and safety.

As you can see, we're strongly opposed to this project on all levels including zone changes, air quality, noise, environmental hazards, fire plans or lack of, water and traffic.

All names listed below along with their email addresses are residents of Deer Springs Oaks and we will appreciate confirmation from you when this email has been received.
Thank you.

Debra Siebert dsiebert824@gmail.com
JACK MILLER jackbmillan24@gmail.com

Larry & LaVonne Bringham lbringham2@cox.net

Rj & Michael Marletre R MIKAELE97@cox.NET

Karen May kdkcarlsbad@yahoo.com

DARLA KENNEDY KITCHENDESIGN4U@cox.NET

WILLIAM R. YOUNG

Elsie E Gregory

Veronica Guzman Bow vguzmanbow@yahoo.com

Francis (Torii) Fison tfison@cox.net

Sibbet, David

From: D Silva <mrs.dalenesilva@gmail.com>
Sent: Saturday, October 12, 2019 4:42 PM
To: Sibbet, David; Wardlaw, Mark; Desmond, Jim; Mills, Benjamin
Subject: 25568 Mesa Rock Road

SUBJ: NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN I-15 REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012 No to Arie DeJong, Hilltop Group Inc. constructing a recycling plant at 25568 Mesa Rock Road!

It comes to my attention that the County determined that a full Environmental Impact Report (EIR) was necessary in 2015, however; the applicant is now using the California Environmental Quality Act process to provide less information in an attempt to satisfy existing County environmental standards. Given the potential impact of the project on the surrounding area, a full EIR should be required. I request the applicant to be required to submit a full Environmental Impact Report for this project as the County required in 2015. The presence of an industrial recycling center in this residential area would have a number of negative consequences for local residents, to include: ☐ Health: Probable negative health consequences to flora, fauna and humans due to decreased air quality and a lack of monitoring of emissions from this site. There are no independent controls proposed to limit the items brought to, or delivered from this recycling center. ☐ Production: The applicant claims that 48 tons of material will be produced daily, and the environmental impact reports submitted are based on that level of output. The applicant is legally allowed to produce 174 tons daily, which would vastly increase impacts to the surrounding area and render their submitted environmental reports invalid. ☐ Noise: Machinery capable of delivering and processing concrete and other building materials operating between the hours of 5am to 7pm, Monday through Saturday. ☐ Traffic: More heavily-laden trucks and passenger vehicles driving on our already burdened local roads and decreasing their serviceable life. ☐ Decreased Property Values: Due to the presence of high-impact industrial activity in close proximity to our homes, disturbing noise and unknown air quality effects from this project. High-impact industrial activity is inconsistent with the surrounding area, harmful to our interests and needs to be stopped. Inscribed on the seal of the County of San Diego are the words, "The Noblest Motive is the Public Good." I ask you, and all County government, to live up to those words. The public good is not served by such a disruptive presence as this proposed project.

No to the Recycling Plant at 25568 Mesa Rock Road!

Sincerely,
 Concerned Residents of East Reidy Creek

The Silva Family

Sibbet, David

From: Katherine Sims <kesims@yahoo.com>
Sent: Thursday, October 10, 2019 5:50 AM
To: Sibbet, David
Subject: Subject: North County Environmental Resources, Site Plan I-15 Review, S.O:
PDS20083500-08-015, Log No.PDS2008-3910-0808012

David Sibbet
County of San Diego
Planning and Development Service

Mr. Sibbet:

As residents who own our homes at Deer Springs Oaks Mobile Home Park we are writing to oppose this Recycling project. We are a 55+ community and many of our residents already have respiratory issues and having so many environmental hazards nearby is a big concern for us. We request the following:

Reinstate the EIR requirement that the Planning Department established for this project in 2014.

Planning Department to restrict permitted use/volume that is outlined in the initial request(4 trucks or waste per day in/ 2 trucks per day out).

Require full environmental monitoring and response measurements to be included so entire surrounding community ensured of safe guards to our health and safety.

As you can see, we're strongly opposed to this project on all levels including zone changes, air quality, noise, environmental hazards, fire plans or lack of, water and traffic.

All names listed below along with their email addresses are residents of Deer Springs Oaks and we will appreciate confirmation from you when this email has been received.

Thank you

Katherine Sims
San Marcos

Sibbet, David

From: Lois Sklar <lbsklar2@gmail.com>
Sent: Monday, October 14, 2019 3:05 PM
To: Wardlaw, Mark; Sibbet, David
Subject: Debris Recycling Facility Proposal in North County

Importance: High

Dear Sir:

It is a fact that this facility poses a danger of fire, noise pollution and actual pollution to neighborhoods in the North County Inland area. There is a significant impact on health issues, property values, environmental concerns, and life style values.

This is even more concerning because the County of San Diego did little to provide notice to the surrounding communities of the September meeting held in San Marcos.

A faulty EIR was never corrected. The EIR is necessary to avoid significant negative impacts to air quality, noise, traffic, and fire danger on 139 acres. The Planning Department told the Company their EIR was inadequate. It has never been fixed. This company is not exempt from the law.

How can you not consider the 6000 residents and homes that are in this area, not to mention all those that drive the I15 corridor daily.

It saddens me to see that the health, safety and quality of life for the residents of this County are no longer important to those that our taxes support.

I would appreciate a response. Thank you.

Sincerely,

Lois Sklar
Lou Carson

2954 Ora Avo Terrace
Vista, CA
760 550-8010

Director, Mark Wardlaw
 County of San Diego Planning and Development Services
 Project: PDS2008-3500-08-015; PDS 2008-3910-0808012

Dear Sir,

This narrative will implore you to reassess and disapprove the pending, above aforementioned project regarding the installation of a high impact industrial recycling plant proposed to be placed directly in the middle of several rural and semi-rural surrounding residential neighborhoods located in an extremely dangerous fire area. Just the reference to "high impact industrial", extreme fire danger, semi-rural and residential would put this matter into context as out of place and inappropriate for the location and situation.

Please evaluate and consider the following special circumstances in order to fully assess the potential dangerous, harmful and unwarranted conditions that may ensue should this project continue.

Extenuating, special and significant circumstances:

- A high impact industrial activity, with greater than normal accidental fire events as a result of operations, is located less than ½ mile from surrounding residential neighborhoods, and located in a semi-rural, extremely hazardous fire area, exposing the surrounding residential neighborhoods to the unnecessary fear and threat of wildfire danger.
- Direct line-of-site exposure to offending noise, harmful pollutants and particulates projecting into the surrounding neighborhoods exposing the residents to undue health, adverse life value implications, and depreciated home values.
- Easterly flowing and prevailing afternoon trade winds will subject the surrounding neighborhoods and schools to cumulated and harmful pollutants and particulate matter.
- The topography approximately ½ mile due east, encompasses a boxed or dead-end canyon (Reidy creek), consisting of approximately 6,700 residences and numerous schools, where there is no substantial exhaust or exit for a continuous incursion of offending odor and air-borne particulate matter.
- Surrounding surface streets already entail dangerous traffic situations and congestion that would only be compounded with the addition of large trucks and semi-trucks traveling through-out the region. This would also impose an undue danger and burden on the residents directly adjacent to the roads and surrounding access points.

Although with an outdated and "streamlined" environmental review performed 10 years ago that may have complied at a cursory level regarding density, zoning, and the general plan, it will be determined with an updated EIR and a detailed study and analysis of special and significant circumstances, that this project will in fact have several specific and significant impacts and effects which have not been analyzed and are peculiar to the project or its site.

Additionally it will be provided that the project will in fact have a substantial off-site and cumulative impact to the surrounding residential neighborhoods and schools that have not been disclosed or evaluated due to inadequate assessment by the GPU and the outdated EIR.

Regardless of the state mandates, this project should be individually re-assessed, and issues identified as special and extenuating circumstances. Please embrace and assess these disclosures in your decision to not approve the pending process and development of this project.

Respectfully submitted,



LEIGH SOBOTKA
 2963 Rue Montreux

Date:

10/22/2019

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

I am a resident in the Montreux Homeowners Association, a community that is roughly a third (1/3) of a mile from, and at about the same elevation as, the site for the proposed North County Environmental Resources project ("Project"). I submit this public comment letter concerning the proposed section 15183 exemption ("Proposed Exemption") as the County of San Diego ("County") should require the applicant, Hilltop Group Inc. ("Applicant"), to prepare an Environmental Impact Report ("EIR") for the Project due to its foreseeable significant environmental impacts which will impact my family's and my community's health and well-being. I am dismayed that the County, having determined in 2015 that the Project requires an EIR, now proposes to fast-track environmental review of the Project through an unsupported and inapplicable exemption to limit public participation contrary to CEQA's requirements.

It is inappropriate for the County to base proposed findings supporting the Proposed Exemption on technical reports, many of which are five to ten years old and do not reflect existing baseline conditions, and others which are explicitly drafts or preliminary in nature. The alleged findings of these unreliable reports do not support the necessary findings for the Proposed Exemption. Moreover, many of the technical reports speciously limit their analysis to how the Applicant says it will operate the Project instead of analyzing the Project's maximum permitted use, thereby minimizing the Project's impacts by violating CEQA's mandate that a project's foreseeable environmental impacts be analyzed on its maximum use. An EIR is needed to ensure that these concerns are addressed and so there is public transparency for this highly-controversial project.

The peculiar presence of an industrial processing facility largely surrounded by residential areas will be disruptive and have myriad significant environmental consequences on nearby residents, including:

- Particulate emissions from demolition and leveling on mountain side as well as from operation of crushing and grinding and material handling equipment outdoors.
- Noise from explosive blasting during construction phase and then the operation phase of crushing and associated equipment on site.
- Operating hours of 5:00 AM - 7:00 PM, 6 days a week contrary to General Plan Policy N-5.2.
- Noise and dust from fully loaded trucks entering and leaving site through Mesa Rock Road, Center City Parkway and the Deer Spring overpass.
- Community is burdened with monitoring and reporting violations including gas emissions, noise, dust, or truck loads in and out. Monitoring equipment not included in project.
- Excessive grading of an iconic hill and rock known by residents with affection as Bear Rock.
- A facility to be perched on high level grade in view of over 6100 residents.

I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed,

Leigh Schotta

Print Name,

Leigh Schotta

Address,

2963 Rue Montreux
 ESCONDIDO 92026

Sibbet, David

From: Diane Sorlie <desorlie@gmail.com>
Sent: Wednesday, October 02, 2019 3:48 PM
To: Sibbet, David
Subject: Mesa Rock construction recycling plant plans

Mr. Sibbet,

I would like to add my voice to my many neighbor's in harsh opposition to the plans for a construction debris recycling plant on Mesa Rock Road in Escondido. This is yet another plan to blight our area with a totally inappropriate use of open and residential space. My concerns are many-firstly, how this project came to this point of approval in our neighborhood with little notice, apparently a questionable permit process and lacking environmental due diligence. Secondly, we have already fought against development in the area due to traffic impact at the Deer Springs/I-15 intersection and surrounding roads. The roads are severely impacted now and adding up to 110 trips a day by big trucks as stated in the report would create a more compromised intersection. This is a huge concern for our quality of life and safety in the event of wildfire evacuation.

I am also extremely concerned about the pollution, both air and noise this plant would bring about. It is planned for the worst possible spot, in a residential area and with the windflow, could impact several schools and our children's health. The possibility that there could be toxic dust and the additional contaminant by-products of this plant is completely unacceptable for this area. More suitable areas could surely be found for this plant.

Please consider all requests for finding a more suitable spot for this project--it does not belong in our backyard!!

Sincerely,

Duane and Diane Sorlie
10303 Legend Rock Rd.
Escondido, Ca. 92026

Sibbet, David

From: Smith, Ashley
Sent: Wednesday, October 02, 2019 2:49 PM
To: Sibbet, David
Subject: FW: Recycling plant on Mesa Rock in Escondido

From: Cabral, Cecilia <Cecilia.Caballes@sdcounty.ca.gov> **On Behalf Of** Wardlaw, Mark
Sent: Wednesday, October 02, 2019 2:48 PM
To: Slovick, Mark <Mark.Slovick@sdcounty.ca.gov>; Smith, Ashley <Ashley.Smith2@sdcounty.ca.gov>
Cc: Flannery, Kathleen <Kathleen.Flannery@sdcounty.ca.gov>
Subject: FW: Recycling plant on Mesa Rock in Escondido

FYI

From: Aquajet Art <aquajetart@gmail.com>
Sent: Wednesday, October 02, 2019 1:28 PM
To: Wardlaw, Mark <Mark.Wardlaw@sdcounty.ca.gov>
Subject: Recycling plant on Mesa Rock in Escondido

Mr. Wardlaw,

I am so angry that "planning" people would even think to put a noisy, dirty recycling plant right in the middle of a rural residential area. How dare you attempt to make us live with the debris and the noise? Noise carries very easily in our area. The wind would push all that dust and debris right through our valley.

It may be great for all of you to buddy up with these people who line the pockets of our politicians, but not for us who have to live with something like this. Don't let this happen!! Represent the people and put this somewhere that makes better sense!!

Shirley Strub

Sibbet, David

From: Michelle Takagi <weightsandwhey@gmail.com>
Sent: Monday, October 28, 2019 1:46 PM
To: Sibbet, David; Wardlaw, Mark; Desmond, Jim; Mills, Benjamin; Gaspar, Kristin
Subject: Recycling Center in our Residential areas

Dear David, Mark, Jim, Benjamin and Kristin,

I am deeply grieved and troubled by the prospect of having a Recycling Center in the middle of our neighborhoods.

We all have too much stress in our lives. Our homes should be a place of refuge and rejuvenation. Having a Recycling Center in our neighborhood would destroy that. Think of how annoying it is to have a barking dog in your neighborhood. Now imagine the CONSTANT banging of crushing concrete and trucks' backing up beeping noise ALL DAY. LONG???? Just the thought of it makes me depressed. So, I thought of the **mental health impact** on everyone in the surrounding neighborhoods. STRESS is a major health problem and this noise pollution would definitely increase every one's stress level.

How ironic or TIMELY that this article came in my inbox after Thursday's meeting regarding the Recycling Center: <https://draxe.com/health/childrens-mental-health-air-pollution/>

I was concerned about my own mental health with the noise and air quality pollution created by such a recycling center but here is research on how it affects children!!! **"The World Health Organization warns that fine particulate matter in air pollution poses the greatest effects on human health. Most fine particulate matter comes from fuel combustion emitted from vehicles, power plants, households and more."**

I join with my fellow neighbors and am vehemently opposed to this Recycling Center coming to our neighborhoods. I am in agreement that it poses a long-term health and safety issue with the inhalation of fine particles in the air, that it would create a great deal of noise pollution, never allowing the bodies of those living nearby to fully relax in their own homes, the increase in fire danger to surrounding neighborhoods, increased traffic congestion and more air pollution, and how negatively this will affect the value of the homes we worked so hard to purchase.

And I return to the article I shared above. Our children deserve to be able to play outside without their physical and mental health being at risk.

Sincerely,

Michelle Takagi
 330 Cheyenne Ln, Escondido, CA 92026
 Ph# 760-670-1102

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Date: 10/24/19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

I live in an area that will be significantly impacted by the proposed North County Environmental Resources (NCER) ("Project"). I submit this public comment letter concerning the proposed section 15183 exemption ("Proposed Exemption") as the County of San Diego ("County") should require the applicant, Hilltop Group Inc. ("Applicant"), to prepare an Environmental Impact Report ("EIR") for the Project due to its foreseeable significant environmental impacts which will impact my family's and my community's health and well-being. I am dismayed that the County, having determined in 2015 that the Project requires an EIR, now proposes to fast-track environmental review of the Project through an unsupported and inapplicable exemption to limit public participation contrary to CEQA's requirements.

It is inappropriate for the County to base proposed findings supporting the Proposed Exemption on technical reports, many of which are five to ten years old and do not reflect existing baseline conditions, and others which are explicitly drafts or preliminary in nature. The alleged findings of these unreliable reports do not support the necessary findings for the Proposed Exemption. Moreover, many of the technical reports speciously base their analysis on how the Applicant says it will operate the Project instead of the maximum physical uses, thereby violating CEQA's mandate that the worst-case scenario be used to assess a project's foreseeable environmental impacts and wrongly allowing the reports to minimize the Project's impacts. An EIR is needed to ensure that these concerns are addressed and so there is public transparency for this highly-controversial project.

The peculiar presence of an industrial processing facility largely surrounded by residential areas will be disruptive and have myriad significant environmental consequences on nearby residents, including:

- Particulate emissions from demolition and leveling on mountain side as well as from operation of crushing and grinding and material handling equipment outdoors.
- Noise from explosive blasting during construction phase and then the operation phase of crushing and associated equipment on site.
- Operating hours of 5:00 AM - 7:00 PM, 6 days a week contrary to General Plan Policy N-5.2.
- Noise and dust from fully loaded trucks entering and leaving site through Mesa Rock Road, Center City Parkway and the Deer Spring overpass.
- Community is burdened with monitoring and reporting violations including gas emissions, noise, dust, or truck loads in and out. Monitoring equipment not included in project.
- Excessive grading of an iconic hill and rock known by residents with affection as Bear Rock.
- A facility to be perched on high level grade in view of over 6100 residents.

I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, Michelle TakagiPrint Name, Michelle Takagi Address, 330 Cheyenne Lane

Sibbet, David

From: Valerie Targia <valtargia@yahoo.com>
Sent: Friday, September 27, 2019 11:57 AM
To: Sibbet, David
Subject: RECYCLING/DUMP SITE ON I-15

North County Environment:

**PDS2008-3500-08-015; PDS2013-BC-13-
PDS2008-3910-0808012**

Mr.Sibbet,

As concerned residents of a nearby. upscale neighborhood, we are absolutely opposed to the proposed dump site on I-15 so close to our neighborhood.

A dump site involves industrial activity, and should never be allowed in and around residential homes. It will substantially affect property values in the surrounding residential and vacation facilities in the area.

Industrial facilities obviously belong in industrial areas not close to residential communities. In addition to the noise, and pollution, it will create horrendous traffic problems.

There are so many other vacant properties in San Diego county that are far more suitable for the proposed dump site.

This is a common sense decision. So, please make a common sense decision to locate this proposed dump site somewhere else that will not impact hundreds of homeowners.

Thank you

Valerie & Joseph Targia

Sibbet, David

From: John Thomas <jontms1@gmail.com>
Sent: Friday, October 25, 2019 1:23 PM
To: Sibbet, David
Subject: North County Environmental Resources;Exemption from Additional Environmental Review
Attachments: Comments to EIR Waiver.pdf

John A. Thomas
1940 Sleepy Hollow Road
Escondido, CA 92026

October 25, 2019

Subject: Exemption from Additional Environmental Review and 15183 Checklist; North County
Environmental Resources Record ID:
PDS2008-3500-08-015, PDS2013-BC-13-0019; PDS2008-3910-0808012

Mr. Sibbet

I have a few comments that I would like you to consider while processing the Subject request.

The county's vision for the future for this area that has been incorporated in planning documents is largely Residential with small pockets of commercial and light industrial. There is no good reason to change the plan for this unwanted, environmentally unacceptable, vanity project, and there are compelling reasons to dismiss the Request for Exemption.

Please do not streamline the process or advance this project that threatens the health of nearby and future residents. Please do not authorize a high impact business that will violate almost every standard used for evaluation by the I-15 Corridor Design Review Board. Do not authorize a business that can expose the County to hundreds of millions of dollars of risk with no significant benefit. Please do not allow the applicant to cut down the side of a mountain along the scenic I-15 corridor.

Stop this project permanently now, please.

PRINCIPAL CONCERNS:

1. The project is so poorly suited for this area, I fear that the Design Review Board will not be able to fairly apply the "SCENIC PRESERVATION GUIDELINES" for the I-15 Corridor. The process that produced these guidelines didn't sufficiently consider the threat of Spot Zoning. This application is clearly singling out a few parcels of land for a use classification that is totally different from that of the surrounding area, for the benefit of the owner of such property and to the detriment of other owners. It is clear that the owner's strategy is to take advantage of common arguments for small projects to justify dangerous shortcuts in building out this massive grading project. The project needs to be stopped early in the application process before it advances to the stage where mitigations are irrelevant. If not stopped now, a complete environment impact review must be performed to understand the consequences of the project over its lifetime lifetime.

2. The applicant's request for exemption from environment review requirements has no basis in fact and an unsupportable basis in law. According to the press, the applicant is an admitted felon with a history of environmental crimes. He is asking the county to give him the authorization to destroy the view of thousands of current and future residents. He is asking the county to trust him with the health and well being of thousands of county residents with no analysis, review, or monitoring of the project. When health impacts show up, and I believe they will. He will close the business, and residents will sue the county. If the county lets the project move forward with no process to mitigate off-site health risks, they assume shared responsibility.
3. The project grading requirement will create a permanent blight on the landscape. 182,430 yards of material needs to be moved on the 139.5-acre site. That is 12,000 Semi-sized truckloads; enough to stack a football field 10 stories high. You can see that from space much less from nearby properties. This area that I live in is designated for future residential growth. This single, ill-suited project is capable of damaging the sales value of thousands of current and future units. Even if it has just a \$10k impact on the value of 2,000 homes, that is \$200,000,000 (two hundred million) in probable economic damage from this project.
4. The project will have little operational oversight and will certainly not have reliable systems monitoring and alert for emissions. If there is no oversight of the emissions, their production will be directly related to the way the equipment is operated and the materials processed. Emissions should be restricted using the operating capacity of the processing equipment used on-site and the hours of operation allowed per day. Independent monitoring should be required to ensure that the type and quantity of materials processed. There should also be monitoring of off-site releases that include particulates and further analysis to ensure all materials that can have a health impact on the community; such as heavy metals, and asbestos, are not emitted.
5. There is no good reason to grant the zoning request, but in the event that you must continue to advance this project, my concerns will be covered more thoroughly if the applicant is forced to produce a full Environmental Impact Report about the project. The County determined that the full report was necessary in 2015. The applicant is attempting to use the California Environmental Quality Act (CEQA) process to provide minimal information in an attempt to satisfy existing County environmental standards. Given the potential impact of the project on the surrounding area, a full Environmental Impact Report should be required.

Regards,
John A Thomas
jontms1@gmail.com

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John A. Thomas
1940 Sleepy Hollow Road
Escondido, CA 92026

October 25, 2019

Subject: Exemption from Additional Environmental Review and 15183 Checklist
North County Environmental Resources Record ID:
PDS2008-3500-08-015, PDS2013-BC-13-0019; PDS2008-3910-0808012

Mr. Sibbet

I have a few comments that I would like you to consider while processing the Subject request.

The county's vision for the future for this area that has been incorporated in planning documents is largely Residential with small pockets of commercial and light industrial. There is no good reason to change the plan for this unwanted, environmentally unacceptable, vanity project, and there are compelling reasons to dismiss the Request for Exemption.

Please do not streamline the process or advance this project that threatens the health of nearby and future residents. Please do not authorize a high impact business that will violate almost every standard used for evaluation by the I-15 Corridor Design Review Board. Do not authorize a business that can exposes the County to hundreds of millions of dollars of risk with no significant benefit. Please do not allow the applicant to cut down the side of a mountain along the scenic I-15 corridor.

Stop this project permanently now please.

PRINCIPAL CONCERNS:

1. The project is so poorly suited for this area, I fear that the Design Review Board will not be able to fairly apply the "SCENIC PRESERVATION GUIDELINES" for the I-15 Corridor. The process that produced these guidelines didn't sufficiently consider the threat of Spot Zoning. This application is clearly singling out a few parcels of land for a use classification that is totally different from that of the surrounding area, for the benefit of the owner of such property and to the detriment of other owners. The owner's strategy is to take advantage of common arguments for small projects to justify dangerous shortcuts in building out this massive grading project. The project needs to be stopped early in the application process before it advances to the stage where mitigations are irrelevant. If not stopped now, a complete environment impact review must be performed to understand the consequences of the project over its lifetime.
2. The applicant's request for exemption from environment review requirements has no basis in fact and unsupportable basis in law. According to the press, the applicant is an admitted felon with a history of environmental crimes. He is asking the county to give him the authorization to destroy the view of thousands of current and future residents. He is asking the county to trust him with the health and well being of thousands of county residents with no analysis, review, or

monitoring of the project. When health impacts show up, and I believe they will. He will close the business, and residents will sue the county. If the county lets the project move forward with no process to mitigate off-site health risks, they assume shared responsibility.

3. The project grading requirement will create a permanent blight on the landscape. 182,430 yards of material need to be moved on the 139.5-acre site. That is 12,000 Semi-sized truckloads; enough to stack a football field 10 stories high. You can see that from space much less from nearby properties. This area that I live in is designated for future residential growth. This single, ill-suited project can damage the sales value of thousands of current and future units. Even if it has just a \$10k impact on the value of 2,000 homes, that is \$200,000,000 (two hundred million) in probable economic damage from this project.
4. The project will have little operational oversight and will not have reliable systems for emissions monitoring and alert. If there is no oversight of the emissions, their production will be directly related to the way the equipment is operated and the materials processed. Emissions should be restricted using the operating capacity of the processing equipment used on site and the hours of operation allowed per day. Independent monitoring should be required to ensure that the type and quantity of materials processed. There should also be monitoring of off-site releases that includes particulates and further analysis to ensure all materials that can have a health impact on the community; such as heavy metals, and asbestos, are not emitted.
5. There is no good reason to grant the zoning request, but if you must continue to advance this project, my concerns will be covered more thoroughly if the applicant is forced to produce a full Environmental Impact Report about the project. The County determined the full report was necessary in 2015. The applicant is attempting to use the California Environmental Quality Act (CEQA) process to provide minimal information to satisfy existing County environmental standards. Given the potential impact of the project on the surrounding area, a full Environmental Impact Report should be required.

Sincerely,

John A. Thomas
1940 Sleepy Hollow Road
Escondido, CA 92026

Sibbet, David

From: Melanie Thompson <melson39@hotmail.com>
Sent: Tuesday, September 24, 2019 10:04 AM
To: Sibbet, David
Subject: Recycling plant in North Escondido on Mesa Rock Road

Dear Mr. Sibbet,

As a resident in this area, I am writing to voice my opposition to locating a recycling plant in this location or any location that is zoned **residential** or agricultural and would share the neighborhood with people's homes.

If you want to see what happens when you combine residential and industrial use in neighborhoods, take a look at the La Presa and Bancroft areas of Spring Valley. Homes in those neighborhoods of Spring Valley would easily be worth two to three times as much if there were no recycling plants, auto-body shops, junk yards, metal fabrication plants, etc., in the same neighborhoods. **Once you allow one major industrial use, more will follow.** I know because I grew up in the Bancroft area of Spring Valley, and what was once a safe, peaceful community of well-cared for homes became a nightmare that I was forced to leave. Those unfamiliar with what Spring Valley originally looked like in the 1960's would be shocked to see it. One by one, industrial plants came and destroyed the neighborhoods. I had a lovely 2400 square foot home on an acre in the Troy Street area, that I was only able to get \$300,000 for at the height of the real estate boom in 2005, because there were 2 recycling plants nearby. The same home in La Mesa, where they don't allow industrial in residential neighborhoods, would have sold for three times as much.

Homes in North Escondido in the Jesmond Dene, Escondido Hills, Coyote Acres, Escondido Country Club and others that are currently valued at \$700,000 - \$1,000,000 will also have their values cut to less than half, as happened in Spring Valley. Think what that will do for the money currently being received from property taxes for this North Escondido area – it will also be cut to less than half. That alone should be a reason to disallow this plant from being constructed, or any other industrial-use in residential neighborhoods.

Sincerely,

Melanie Thompson

Sent from Mail for Windows 10

Sibbet, David

From: Bob Tulis <btulis@cox.net>
Sent: Wednesday, October 16, 2019 5:08 AM
To: Sibbet, David
Subject: Opposition to the Hilltop Group application for concrete crushing facility on Mesa Rock Road, Escondido

October 16, 2019

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Dear Mr. Sibbet,

This letter is written in opposition to the Hilltop Group Inc. application to put a concrete crushing facility on Mesa Rock Road, Escondido. I am dismayed and disgusted that the County, having determined in 2015 that the Project requires an EIR, now proposes to fast-track environmental review of the Project through an unsupported and inapplicable exemption to limit public participation contrary to CEQA's requirements.

Operations at this industrial facility threaten my and neighboring communities with many critical dangers:

- Fire danger!
- Air pollution due to dust and gas emissions! (Think 911 pollution when concrete buildings collapsed!)
- Noise pollution (Think noise not only from the crushing operation but also the delivery dump trucks. In addition, this noise will be amplified by the surrounding hills which will provide an echo chamber!)
- Traffic congestion from heavily loaded tractor trailers on the already over-loaded Route 15 / Deer Springs intersection.
- Reduced service life of roads from excessive wear from these heavy trucks.
- Property values decreased by the sight and sounds of an industrial facility perched on high level grade in view of over 6100 residents living in suburban communities that will be significantly impacted by the proposed North County Environmental Resources (NCER).

Sincerely,

Robert Tulis
27718 Willow Trail, Escondido, CA 92026

Sibbet, David

From: Rosemary Tulis <rjtulis@cox.net>
Sent: Tuesday, October 15, 2019 9:38 PM
To: Sibbet, David
Subject: Opposition to the Hilltop Group application for concrete crushing facility on Mesa Rock Road, Escondido

October 15, 2019

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Dear Mr. Sibbet,

This letter is written in opposition to the Hilltop Group Inc. application to put a concrete crushing facility on Mesa Rock Road, Escondido. I am dismayed and disgusted that the County, having determined in 2015 that the Project requires an EIR, now proposes to fast-track environmental review of the Project through an unsupported and inapplicable exemption to limit public participation contrary to CEQA's requirements.

Operations at this industrial facility threaten my and neighboring communities with many critical dangers:

- Fire danger!
- Air pollution due to dust and gas emissions! (Think 911 pollution when concrete buildings collapsed!)
- Noise pollution (Think noise not only from the crushing operation but also the delivery dump trucks. In addition, this noise will be amplified by the surrounding hills which will provide an echo chamber!)
- Traffic congestion from heavily loaded tractor trailers on the already over-loaded Route 15 / Deer Springs intersection.
- Reduced service life of roads from excessive wear from these heavy trucks.
- Property values decreased by the sight and sounds of an industrial facility perched on high level grade in view of over 6100 residents living in suburban communities that will be significantly impacted by the proposed North County Environmental Resources (NCER).

Sincerely,

Rosemary Tulis
27718 Willow Trail, Escondido, CA 92026



TWIN OAKS VALLEY COMMUNITY SPONSOR GROUP

P.O. Box 455

San Marcos, Ca. 92079

September 23, 2019

David Sibbet
County of San Diego
Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

RE: North County Environmental Resources PDS2008-3500-080-015; PDS2013-BC-13-0019; PDS2008-3910-08-08-012
Comments to the Intent To Adopt Findings.

Dear Mr. Sibbet,

In 2014 the Twin Oaks Valley Community Sponsor Group provided comments to a Notice of Preparation for and EIR. We were surprised to find in our mailbox on the 12th, just in time to make our agenda the month, the County's Intent to Adopt Findings. Due to the complexity of the documents and the significant quality of documents we request a 45 day review period. Given this project has been in process for seven years a fifteen more days for the public to review the documents and formulate meaningful comments is not too much to ask. Below are a few questions we have:

1. Why did the County not address or respond to our previous comment letters? We provided comments to the 2012 scoping letter and our response for the 2014 NOP. We have been waiting for the EIR to be released in hopes it would address the concerns we raised. I have included it and would appreciate a response by the time of the public meeting.
2. What occurred between 2014 and a week or so ago that made it possible for this project to qualify for a 15183 exemption? Using the 15183 process via a General Plan Update wrapper to prevent adequate public review of a project, one that is clearly vastly different from what borders it is not what the 15183 process was intended for. The determination for exempt this project for an EIR seems odd. We are confused why five years later the County finds the project doesn't need an EIR.

During the General Plan update the Twin Oaks Valley Community Sponsor Group was opposed to the rezone of this site to High Intensity Industrial because the site is close to

residential uses and is in an aesthetically important area along the I-15 corridor. We felt the change to High Impact Industrial was a Spot Zoning as defined by “*The granting to a particular parcel of land a classification concerning its use that differs from the classification of other land in the immediate area.*” We were concerned because it appeared to be an *arbitrary, capricious, and unreasonable treatment of a limited area for the benefit of a single property owner.*

We are very concerned this is what is happening in this case.

I 15, between Escondido and 76, is one of the last segments that still has the rugged beauty that makes it a gateway to San Diego. It is critical that the site be development with sensitivity. It is not suitable for high impact industrial use.

We have not had sufficient time to review them and understand the County’s actions. We hope you can shed some light on the matter at Tuesday’s public meeting.

Thank you for listening to our concerns.

Sincerely,

Sandra Farrell
Chair, Twin Oaks Valley Community Sponsor Group
Karen Binns
Vice Chair, Twin Oaks Valley Community Sponsor Group



TWIN OAKS VALLEY COMMUNITY SPONSOR GROUP

P.O. Box 455

San Marcos, Ca. 92079

October 9, 2014

Maggie Loy
County of San Diego
Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

**RE: North County Environmental Resources PDS2008-3500-080-015; PDS2013-BC-13-0019; PDS2008-3910-08-08-012
NOP Comments**

Dear Maggie Loy,

The Twin Oaks Valley Community Sponsor Group would like to thank you for the opportunity to comment on this Notice of Preparation. As the County is aware, there has been a lot of Community involvement with this project and our Group has been following this project from its beginnings. We ask that the EIR for the North County Environmental Resources (NCER) consider the following:

1. During the General Plan update the Twin Oaks Valley Community Sponsor Group was opposed to the rezone of this site to High Intensity Industrial because the site is close to residential uses and is in an aesthetically important area along the I-15 corridor. We felt the change to High Impact Industrial was a Spot Zoning as defined by *"The granting to a particular parcel of land a classification concerning its use that differs from the classification of other land in the immediate area."* We were concerned because it appeared to be an *arbitrary, capricious, and unreasonable treatment of a limited area for the benefit of a single property owner.*
2. We ask that the EIR address the impacts of the zoning change and to provide clear legal justification for the zoning change so the public can be assured the zoning, which allows for this project, is appropriate, and the change to High Impact Industrial was done legally.
3. The EIR should evaluate at least three project alternatives that consider placing the project in existing industrial parks where these activities are allowed. Escondido, Vista and San Marcos have industrial parks zoned for the use that is being proposed

on this site. These industrial parks have been designed to accommodate the traffic, odors, noise, waste water treatment and other issues that will occur from this type of activity. In addition, due to the economic problems of the last six years, some of these parks have many large vacant buildings.

Air Quality:

- a. The EIR needs to study impacts from activities being planned for the site as well as cumulative impacts, both off site and on site of vehicular traffic that will be used to run the industrial operations. Activities such as rock crushing and unloading of material may have significant negative impact on residents. In addition, the large trucks being used to transport material to and from the site will add pollutants both from diesel exhaust and from the material being transported.
- b. Also, wind currents in the area may spread pollutants far beyond the site, negatively impacting nearby residents. The EIR should include a wind and microclimate study to look at how air borne particles from the site and from trucks being used for the operation, could impact adjacent residential properties.
- c. Many of the people who live near the site, such as those living in the Deer Springs Mobile Home Park, are elderly and likely have respiratory health issues that will be exacerbated by the airborne pollutants created by this project. The EIR should provide data identifying the different pollutants from the project, list how it may impact nearby residents and other businesses, and provide adequate mitigation to eliminate project impacts.
- d. Finally, the EIR should define what methods will be use to ensure mitigation measures are being followed. The community is experiencing problems with uncovered loads, dust, noise and speeding from trucks traveling to and from the quarry located on North Twin Oaks Valley Road. No enforcement measures are being used by the County. The public needs to be assured that there is sufficient mitigation and enforcement measures in place for the NCER project to prevent problems the community now experiences from the quarry, which is another form of high-impact industrial activity. The EIR needs to identify who will enforce these measures and prove they can do so. The EIR should study the use of a bond or other financial mechanism to pay for independent enforcement.

Will the trucks be covered when they are arriving and leaving the site? (legally they are supposed to but we need the EIR to tell us how it will be enforced).

Noise:

- a. The Twin Oaks Valley Community Sponsor Group is very concerned with the hours of operation, and why they are so long? They are from 5 am to 7 pm Monday thru Saturday. Since most business start at 7 am and close around 4:00 or 5:00 pm and the truck scales do not even open until 7 am, we are concerned independent truckers bringing material into the site will use the early hours to bypass weigh scales, and other legal requirements designed to protect the public. The EIR needs to explain this issue in detail and answer the following: What type of business will they be conducting at such an early hour? What type of noise will this generate? We are concerned this will be a real hardship for the neighbors near this project, or residential neighborhoods that will get truck traffic from this project. Will residents near the site

be listening to large trucks idling as they are staging before 5 am to enter the site? There is a noise ordinance that needs to be adhered to. It starts at 7 am.

- b. The EIR needs to address how the project will be able to adhere to the Noise Ordinance with the type of demolition such as rock crushing, blasting, etc., that they will be conducting. If the project cannot follow the noise ordinance the EIR needs to identify why it can't.
- c. The EIR should identify what the containers used for transportation of material will be made of. Will they be metal containers? The neighbors will be exposed to the constant "clanging" every time something is dumped into the containers.
- d. The EIR should consider mitigation measures such as building a sound wall and/or using rubberized road surface to help reduce noise created by the project.

Environmental Hazards:

Another concern is how hazardous waste will be handled. We have been told at past meetings that workers at the project site will be visually inspecting each load as it enters. However, this is no guarantee that hazardous materials will be missed. Who is to say that the hazardous materials are not going to be placed in the center of the load where they will not be detected. What happens if they are then detected after the load has been dumped and the dumping party has left the site? The EIR needs to identify how this will be addressed and what checks and balances will be used to ensure compliance.

Fire Plan:

The NOP states that C&D mulch can stay on site for 90 days. Our fear is for a mulch fire on site. Last year there were several mulch fires around the county and they burned for days. The EIR needs to include a discussion of how will the Fire Plan address and provide detailed mitigation measures. If one of the mitigation measures involves the use of water to keep the mulch pile cool so that it won't ignite, then the EIR should identify the amount of water needed and how that will be acquired given the ongoing drought status.

Water:

The project stands to use a tremendous amount of water. We are in a severe drought with no relief in sight. The EIR needs to study if there will be water available and how its use for this project may reduce the amount of water for other agricultural and residential uses.

Traffic:

According to the NOP, the project is only allowed two outbound trucks per day. The EIR needs to identify if this will be a single truck load or a truck with multiple beds, each carrying a load.

Other Issues:

We are concerned that this project won't be economically feasible. The EIR needs to provide a long-range business plan for the project so the public is assured taxpayers won't be on the hook should the project fail, leaving behind a site that requires millions to clean up.

The EIR should also address how the proposed project could damage property values and adjacent properties that are zoned residential. The devaluation of property value will cause a decline in the comparison value or “comps” for people who are trying to sell their property who may not even live next to the site. The EIR needs to study industrial activities of this type that have impacted neighborhoods in the past so the public can be assured the neighborhood will not become blighted. The EIR should also study how this project will impact the Community Character.

The project applicant is notorious for not getting the appropriate licenses. The Community is aware of this and is quite skeptical that he will adhere to the rules and conditions he needs to follow. The Community is also concerned with “piece-mealing” where the applicant understates his project to get approval and then after approval increases his capacity.

Thank you for listening to our concerns regarding this Notice of Preparation.

Sincerely,

Sandra Farrell
Chair, Twin Oaks Valley Community Sponsor Group
Karen Binns
Vice Chair, Twin Oaks Valley Community Sponsor Group

Cc: Beth Ehsan



**COUNTY OF SAN DIEGO
DEPARTMENT OF PLANNING AND DEVELOPMENT
SERVICES: Zoning
COMMUNITY PLANNING OR SPONSOR GROUP
PROJECT RECOMMENDATION**

PROJECT NAME: ____

ADJ Holdings SAJE Complex to North County Environmental Services, : 25568 Mesa Rock Road.

PROJECT CASE NUMBER(s): PDS2008-3500-08-015 (STP08-015) Site Plan I-15 Review (APN 187-100-37)

PLANNING / SPONSOR GROUP NAME: Twin Oaks Valley Community Sponsor Group

Results of Planning / Sponsor Group Review

Meeting Date: __April 17, 2013

A. Comments made by the group and the members of the public on the proposed project.

1. Concerns raised about how truck traffic, especially trucks with trailers, could make the sharp turns needed to transition from Center City Parkway to Mesa Rock Road. One person said there was not way to ensure truck traffic wouldn't use Mesa Rock Road/ Deer Springs over Center City Parkway since ADJ had no control over the trucking firms. Several people said the early start times and late hours of operation were not realistic given the residential areas the trucks would pass through. They asked why construction site would be limited to start and stop time as a way to reduce noise but this project did not have the same time limits given to Sound walls along all truck routes through residential neighborhoods and rubberized roadways.

B. **Advisory Vote:** The Group ☐ Did or ☒ Did Not make a formal recommendation, approval or denial on the project at this time because they had not received the documents needed to review the project that are currently being reviewed by the County. These documents include Biological Report, Noise Study, Traffic Report, Visual Studies.

If a formal recommendation was made, please check the appropriate box below:

MOTION:

- ☐ Approve without conditions
- ☐ Approve with recommended conditions
- ☐ Deny
- ☐ Continue

VOTE: ____ Yes ____ No ____ Abstain

C. Recommended conditions of approval:

Reported by: _____ Position: _____ Date: _____

Attachment B
Please email recommendations to BOTH EMAILS; Project Manager listed in email (in this format):
Firstname.Lastname@sdcounty.ca.gov and to CommunityGroups.LUEG@sdcounty.ca.gov .

PDS-534 PDS-534 (01/12)

5510 Overland Avenue, San Diego, CA 92123 • (858) 565-5981 • 1-888-267-8770 • www.sdcounty.ca.gov/pds/

Sponsor Group Meeting Wednesday, April 21, 2010

- 3) **Attended Planning Commission meeting on April 16. Spoke about community issues Attachment D, handout of remarks previously distributed by e-mail, obtained Merriam Mountain letter and distributed by e-mail. Didn't get Attachment Sandra wanted, requested after left for meeting.**

- 6) **Mesa Rock Nursery CEQA Hydrology Study for ADJ HOLDINGS, LLC at 807 E. Mission Rd. San Marcos, CA 92069.**
 1. **Amended Project Description dated March 15, 2010**
 2. **Present text of hydrology study contains errors; PM 14236 is incorrect, rock nursery unknown description.**
 3. **Question of runoff coefficient on previously graded site, and effect of impervious surfaces on runoff coefficient.**
 4. **Presentation of software calculations incomplete.**
 5. **Review of Twin Oaks Hydrologic Map shows ridgeline bisects area, site drainage may affect wetlands.**
 6. **Review of Twin Oaks Slope Analysis shows that much of the area northeasterly of the above mentioned ridgeline is steep slopes.**
 7. **A requested slope analysis is presented in the form of a GIS TIN. Unfortunately, the average reviewer is not familiar with this form of data presentation. It is requested that the slope information be presented in a form that permits comparison with RPO slope ranges. In addition, it is requested that the source of elevation data be given along with the estimated accuracy of the resulting calculations.**
 8. **Review of Twin Oaks Current Land Uses Map shows considerable residential uses in the surrounding area and land used for, or related to, transportation. The conditions of approval on the Parcel Map should be shown on project maps.**
 9. **Nursery businesses generally use and store pesticides, fertilizers and other chemicals on site. These materials can show up in groundwater and runoff. In view of nearby wetlands and old wells on site, careful evaluation of mitigation measures is a must.**

slfarrell

From: "Henry Palmer" <hpalmer3@dslextre.me.com>
To: <slfarrell@cox.net>
Sent: Monday, April 12, 2010 9:10 AM
Attach: Steep Slope Exhibit.pdf; PLOT PLAN 04 Layout1 (1).pdf; PLOT PLAN 01 Layout1 (1).pdf; PLOT PLAN 02 Layout1 (1).pdf; PLOT PLAN 03 Layout1 (1).pdf
Subject: Fw: CEQA HYDROLOGY STUDY - MESA ROCK

Hi, Sandra

As you may remember, I volunteered to look at the hydrology map and was not satisfied that the hydrology analysis reflected current plans and asked for a list of documents that were going to be submitted to the county.

- There is only one entrance so I asked if the plans had been approved by the Fire Dept. This item is of interest because impervious surfaces will be added and improvements such as clearing will be required alongside the road. These actions both increase runoff.
- The county hydrology manual recommends that when software is used, the software variables be set forth in a section called "Presentation of Product". That saves the reviewer from digging them out of computer runoffs.
- Nurseries use pesticides and fertilizers and BMPs must provide mitigation. In addition, the water quality control board will be requiring testing of runoff from nurseries, farms, stables, etc. I asked for info on this subject.
- An incorrect parcel number was given. I like to look at the parcel map which create parcels because they contain the conditions of approval. I spent \$4 for nothing!
- I asked for a plot plan to get a better idea of what is being proposed.
- In addition, I have been in contact with Carl Stiehl trying to find out why the county is recommending that these parcels be rezoned as high impact industrial which would allow M54, M56 and M58. Read them in the Zoning Ordinance and weep! I also have contacted Escondido Planning because the area is a county island in there sphere. They knew nothing about it.

Hank

----- Original Message -----

From: Gary Larson
To: Henry Palmer
Cc: Rick Gittings ; Shibley1@cox.net
Sent: Friday, April 09, 2010 10:11 AM
Subject: RE: CEQA HYDROLOGY STUDY - MESA ROCK

Henry,

1. Encroachment Open Space Map attached.
2. We are contacting the engineer concerning hydrologic variables.
3. Mitigation measures will be applied at the appropriate time.
4. There is no parcel map associated with this project. This reference will be removed from the report during the design phase.
5. County Fire has approved the access as shown on the plot plan.
6. Copies of the plot plan are attached.
7. Documents currently being submitted to the County:
 - a. Plot Plan
 - b. Stormwater Management Plan
 - c. Biological Report
 - d. Traffic Impact Analysis

Gary Larson

4/12/2010

From: Henry Palmer [mailto:hpalmer3@dslextre.me.com]
Sent: Wednesday, April 07, 2010 9:42 AM
To: Gary Larson
Cc: Gil Jemmott
Subject: Re: CEQA HYDROLOGY STUDY - MESA ROCK

Good morning, Mr. Larson

Thank you for the updated project description. I have requested that the revised project description be placed on the next agenda of the Twin Oaks Valley CSP.

Thank you for the slope graphic, which is apparently a TIN. Instead, I would like to see the slope analysis summarized in RPO format with area per slope interval. Impervious surfaces have been added with the proposed development. Impervious surfaces may have changed the runoff coefficients used in the hydrology analysis. A copy of hydraulic variables used to estimate peak discharge was previously requested. The information and format desired can be found at Chapter 4.11 - "Presentation of Product" - of "Computational Hydrology in Flood Control Design and Planning" which generally comes with the AES software. If not available, I can e-mail you a copy of the format.

Pesticides and fertilizers will be stored on site. Mitigation measures should consider the type of materials that are proposed for use on the site. In addition, the Water Quality Control Board has imposed regulations regarding runoff testing for farms and nurseries.

The parcel map number given in Section 1.1 is incorrect. Please supply the correct parcel map number.

Access is provided from Mesa Rock Road via an improved 32' wide road. Could you comment on possible County fire requirements for an additional exit?

Could you please supply two or three copies of the site plan for use by CSP members in advance of the meeting. Also, do you have a list of the documents that are being currently submitted as a part of the application?

Thanks,

H. L. Palmer

----- Original Message -----

From: Gary Larson
To: Henry Palmer
Cc: Rick Gittings ; Shibley1@cox.net
Sent: Wednesday, March 31, 2010 11:46 AM
Subject: RE: CEQA HYDROLOGY STUDY - MESA ROCK

Henry,

1. The slope map was prepared with AutoCAD/Eagle Point software.
2. The site was previously graded.
3. The project description is attached.
4. The analysis of Caltrans facilities will be preformed during the design phase.

Thank You,
 Gary Larson

From: Henry Palmer [mailto:hpalmer3@dslextre.me.com]
Sent: Monday, March 29, 2010 9:36 AM
To: Gary Larson

Cc: Jon F Mehtlan

Subject: Re: CEQA HYDROLOGY STUDY - MESA ROCK

Good morning, Mr. Larson

Thank you for the slope map. Could you tell me what software was used to prepare the slope map? Was the site previously graded? Proposed land use for the site is described as a "rock nursery" in the project description. Could you please expand on this description? Also, the report refers to Caltrans downstream drainage improvements as probably adequate to handle project runoff. Is there an analysis to support the probable adequacy of the Caltrans drainage improvements?

In general, Sections 1.6 and 1.7 of the June 2003 County Hydrology Manual will be used as the primary guide by the CSG in preparing comments, if any.

Thanks,

Henry Palmer

----- Original Message -----

From: Gary Larson

To: Henry Palmer

Cc: Rick Gittings ; Shibley1@cox.net

Sent: Friday, March 26, 2010 3:43 PM

Subject: RE: CEQA HYDROLOGY STUDY - MESA ROCK

Henry,

Attached is a copy of the slope analysis. The hydrology information you are asking for can be obtained from the Post – Development Site Map and the computer print out.

Thank You,
Gary Larson

From: Henry Palmer [mailto:hpalmer3@dslextreame.com]

Sent: Thursday, March 25, 2010 10:02 AM

To: Gary Larson

Subject: CEQA HYDROLOGY STUDY - MESA ROCK

Good Morning, Mr. Larson

Would it be possible to meet with you in the next week or so to briefly discuss your hydrology report and look at your slope analysis?

Could you hand sketch the different flow regimes between nodes and the variables in each flow process if one is not available. (So far as I know, the AES software doesn't provide a schematic plan.) Please explain initial concentration. Could we look at the drainage plan as a separate layer/sheet?

Thanks,

Henry Palmer, member
Twin Oaks Valley Community Sponsor Group

Sibbet, David

From: sampelwoods <sampelwoods@gmail.com>
Sent: Monday, September 30, 2019 4:10 PM
To: Sibbet, David
Subject: Recycling Plant/Mesa Rock & I 15
Attachments: Screenshot_20190930-155936_Nextdoor.jpg

Sent from my Sprint Samsung Galaxy S8.

3:59 Sprint

LTE 49% P.j. Petoscia, Broadway Laurashawn... 

URGENT SUPPORT NEEDED: TOXIC RECYCLING PLANT ON I-15 & MESA

This is a full-on Bait & Switch situation on how they're pushing it through - and it should not be allowed to happen. Posted in Crime & Safety because it is 100% a Safety issue and will undoubtedly become a serious Health Issue for all of us that live in this area. Furthermore, if this toxic plant is allowed to move forward, it most definitely would be a crime against humans, wildlife, and the environment.

The dreaded toxic plant (includes asbestos, mold, etc.) that reared it's head back in 2013 is moving forward, and San Diego County intends to issue them a permit.

Among other deeply concerning issues - Your air quality is about to become very toxic. There is currently no provision for monitoring this site once it's started, and insanely enough, they are not required to submit a full Environmental Impact Report - which is outrageous.

I also find it very interesting that the affected neighborhoods were not notified. Usually when there is something unsavory afoot - it's politically customary to keep the public unconscious about it. I just happened to find out there will be a public meeting tomorrow night:

Date: Tuesday, Sept 24, 2019 at

Time: 6:30pm

Location: San Marcos Community Services Department, Dining Room Hall, located at 3 Civic Center Drive, San Marcos, CA 92069.

Please show your support, Attend the meeting tomorrow night,
Inundate the County with phone calls,
RAISE YOUR VOICES!



CALL David Sibbet at [\(858\) 694-3091](tel:(858)694-3091) or at



Sibbet, David

From: Swacknitz <wacknitz.stephen@gmail.com>
Sent: Wednesday, September 25, 2019 3:14 PM
To: Sibbet, David
Subject: Re: Last nights signup sheet for NCES

Mr. David Sibbet
 Planning Manager
 Planning & Development Services

Thanks for forwarding the list of attendees. It was a pleasure meeting you last night. I hope last night gave you a firm impression of the communities resistance to the proposed project. As you know, a recycling facility located in a scenic residential area is totally out of place!

Furthermore, the site and use is vulnerable to fires, traffic congestion, ground pollution, and air pollution. Additionally, the project presents a threat to local wildlife.

Considering all of the above, I don't know how this project can be legitimately approved.

Please include this email with the other letters objecting to this project.

Best wishes,
 Stephen H. Wacknitz

Sent from my iPhone

> On Sep 25, 2019, at 10:49 AM, Sibbet, David <David.Sibbet@sdcounty.ca.gov> wrote:

>

>

> See attached, thanks

>

>

> David Sibbet, Planning Manager

> COUNTY OF SAN DIEGO | Planning & Development Services

> 5510 Overland Avenue | Suite 310 | San Diego | CA | 92123 T.

> 858.694-3091 | F. 858.694.3373 | MAIN 858.694.2960 PDS Website

> <http://www.sdcounty.ca.gov/pds/index.html>

> PDS Mapping Service <http://gis.co.san-diego.ca.us/>

>

>

> <Scanned from a Xerox Multifunction Printer.pdf>

Sibbet, David

From: sylvia Wacknitz <kkawac39@gmail.com>
Sent: Thursday, September 26, 2019 6:13 PM
To: Sibbet, David
Subject: Recycling facility proposed for North Escondido

THIS E-MAIL IS NOT ALL ABOUT ME. I am thinking of the neighbors and those of us who have made this area our home for so many years.

My father built our home in 1970 and we moved in and have been here now for almost 50 years. We raised our children here, played with our grandchildren here and now have a great-grandchild. We have an acre with a beautiful view of Escondido and on a clear day can see the ocean.

Years ago I spoke about not having a water park here but now wish it had been built and not this recycling plant that is planned.

People might say well you are old why should you worry you will not be around long, however we would like our last years to be right here.

What reasons do I have to be concerned about this recycling facility? No. 1 it is fire danger. I have kept records for the last few years of

fires that has happened at recycling plants.

#1, Flames leaped at San Marcos Facility Nov. 7, 2014

#2. Fire at Spring Valley, Calif. recycling center July 20, 2016
 firefighter injured damages home

#3 Fire sparks at Lakeside recycling center September 23, 2016
 fire crews arrived to find Quality Recycling in flames

#4 A fire burning at a recycling plant in Ontario, October 21, 2016
 A fire burning at a recycling plant in Ontario sending a plume of black smoke into the air visible for miles

#5. Recycling plant bursts into flames in El Cajon May 16, 2018

#6 Brush fires threatened Escondido neighborhood May 19, 2017
 the fire was on a hillside near the location of the planned recycling plant
 Ground crews helicopter and air tankers worked to corral the flames

No. 2 . I am concerned about the dangerous road Mesa Rock where 4 teenagers were killed in an automobile. A ride down that road shows a sign 15 miles per hour. This accident was near the proposed recycling plant. It is hard to imagine large trucks going on that dangerous road safely without endangering themselves and others. Take a ride down this road. I also have pictures of the road and where the crosses stand in memory of those young people.

No. 3. How about the air. How is this old lady who has asthma going to manage with this air pollution. How will it effect children and all those living in this area.

Should you care? I hope you care about the people living here and not just about a rich man who does not care about the area but just about himself. IT IS ALL ABOUT HIM.

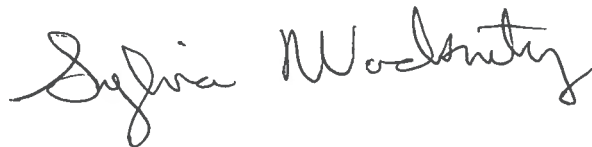
September 20, 2019

Dear David Sibbet,

Thank you for reviewing the material enclosed. I did not send copies of all the letters and correspondence I have with County Supervisors and others. There is so much as I started in 2013.

Sue suggested that I send the information about what I am most concerned which is the fire danger and the roads near the planned site. I have sent pictures of that.

Thank you for your consideration.

A handwritten signature in cursive script, reading "Sylvia Woodbury". The signature is written in dark ink and is positioned below the typed text.

Fire No. 1.

Recycling fire

Nov. 7, 2014 Flames Leap from Trash
Pile at San Marcos Waste facility

Today 1/13/15 I talked to the CEO of EDCO I asked him about the fire I saw on TV that happened at their plant in San Marcos on Nov. 7th it was on TV showing the fire and several fire trucks there. I talked to the CEO of EDCO Jeff Richie and he said it was in a pile of trash but the firemen could not ever determine what caused it. The fire was at 224 S. LosPosa Rd. San Marcos
He said these fires can occur with the piles of cardboard etc.

He wanted to know why I was asking him and I said it was because of the Waste and Recycling Facility they want to put at Mesa Rock and I am concerned about fire there. He said to watch carefully for when the environment report comes out and voice your opinion on it. I asked him if the man that owns this land is connected to EDCO and he said no he use to own the one in Oceanside He wanted to know if a lot of people are fighting it.

I then called Beth again in the county and told her about the fire she said she did not feel I needed to be concerned as they keep the area cleared around the facility and I said this is a dangerous area for fires and she did say she would send a note to the man who is doing this report.

San Marcos City Phone is 760 744 1050



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Flames Leap from Trash Pile at San Marcos Waste Facility

By Andie Adams

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Flames Leap from Trash Pile at San Marcos...



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Owner of a broken T-shirt...

Friday, Nov 7, 2014 • Updated at 6:19 PM PST

A raging fire at a San Marcos trash and recycling facility prompted a major fire department response to stop its spread Friday evening.

Flames Leap from Trash Pile at San Marcos Waste Facility | NBC 7 San Diego

A trash pile caught fire just after 5 p.m. outside the EDCO Waste and Recycling Services building at 168 S. Las Posas Road.

Multiple fire engines from the San Marcos Fire Department were called out to help.

Firefighters grabbed a hose and climbed up a ladder to extinguish the fire from a higher angle.

No injuries were reported, and there is no word on the cause.

Smoke could be seen off State Route 78.



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11 Things You Should Never Do Again After 50

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Fire No. 2

Fire erupts at recycling center in Spring
Valley injures firefighter, damages home

July 20, 1916

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Fire at Spring Valley, Calif., recycling center injures firefighter, damages home

Tuesday | UPI



Fire erupts at recycling center in Spring Valley, firefighter inj...

Tuesday | KFMB-am

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Recycling yard to pay \$90K in civil case

Wednesday Jul 20 | [The San Diego Union-Tribune](#) |  Comment?

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Fire at Spring Valley, Calif., recycling center injures firefighter, damages home

Tuesday | UPI



Fire erupts at recycling center in Spring Valley, firefighter inj...

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Recycling plant fire burning in Spring Valley

Tuesday | [10News](#) | [Comment?](#)

Recycling yard to pay \$90K in civil case

Wednesday Jul 20 | [The San Diego Union-Tribune](#) | [Comment?](#)

Fire No. 3

Fire sparks at Lakeside recycling center

September 23, 1916

Firefighters worked Friday morning to extinguish a fire at a recycling center in Lakeside.

Fire sparks at Lakeside recycling center

BY: City News Service , 10News Digital Team

POSTED: 10:51 AM, Sep 23, 2016

LAKESIDE, Calif. -- Firefighters worked Friday morning to extinguish a fire at a recycling center in Lakeside.

Fire crews arrived to find Quality Recycling at 10027 Vine St. in flames with smoke billowing from the building shortly before 10 a.m., according to Heartland Fire & Rescue officials.

The business, which was open at the time, was evacuated. There were no reports of injuries.

The business collects aluminum, brass and copper, according to its website.

The cause of the fire was not immediately known.

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Fire No. 4

A fire burning at a recycling plant in
Ontario

October 21, 2016

THE STATE



Photographs by IRFAN KHAN Los Angeles Times

Fire at recycler

People in Ontario watch as smoke billows from a three-alarm fire at a nearby cardboard recycler Friday. The blaze was reported just after 4:20 p.m. at State Street and Bon View Avenue, the site of a business that also stores wooden pallets, said Deputy Chief Art Andres of the Ontario Fire Department. Right, firefighters work on the blaze, which was contained about 7 p.m.





By [Neil Nisperos](#), Inland Valley Daily Bulletin

Posted: 10/21/16, 5:28 PM PDT | Updated: 31 secs ago

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Ontario firefighters attempt to get the handle on a fire burning unknown items near State Street and Bon View Avenue in Ontario Friday afternoon, Will Lester/Staff Photographer

ONTARIO >> A fire is burning at a recycling plant in Ontario Friday evening, sending a plume of black smoke up into the air, visible for miles.

An official with the Ontario Police Department confirmed the fire is at a recycling center, though some tweets referred to a hay fire. The address is 825 E. State St., near railroad tracks.

• [Video: Smoke billows at Ontario fire](#)

TV coverage from the air shows stacks of wood pallets on fire.

The police spokesman said propane tanks are exploding.

Freeway traffic was backed up from the area of the fire to the 15 Freeway on both east and westbound lanes.

It was still unclear whether the thick plume of smoke was impacting airport traffic. Nearby homes are being hosed down.

Fire No. Five

Recycling plant bursts into flames in

El Cajon

May 16th, 2018

20 firefighters responded to the blaze

They had to use breathing tanks

3-929

10News

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65

Recycling plant bursts into flames in El Cajon

BY: [Zac Self](#)**POSTED:** 1:52 PM, May 16, 2018**UPDATED:** 2 hours ago

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EL CAJON, Calif. (KGTV) -- A recycling facility's car crusher in El Cajon burst into flames Wednesday afternoon, sending thick, black smoke into the air.

The fire erupted at the intersection of Magnolia Avenue and Bradley Avenue near In-N-Out Burger. On a map, the fire appears to have broken out at All Metal Recycling.

In total, 20 firefighters from Santee Heartland and San Miguel responded to the blaze. Firefighters said they had to use breathing tanks because they didn't want to come into contact with the heavy smoke.

Crews also consulted with a hazmat team due to the nature of the fire. Officials said they are working to try and control runoff from the fire which may contain hydraulic fluid from the car-crushing device.

Sky10 was live over the scene of the fire. Watch the video in the player below:

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Thank you and welcome!

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Fire No. 6

September 19, 2019

This fire was near the location that the county wants the recycling plant built

The fire was on a hillside near the Interstate 15

Ground crews, helicopter and air tankers worked to corral the flames. Homes on the other side of the hill were saved

Brush fire threatens Escondido neighborhood - CBS News 8 - San Diego, CA

AOL: Kkawac

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Brush fire threatens Escondido neighborhood



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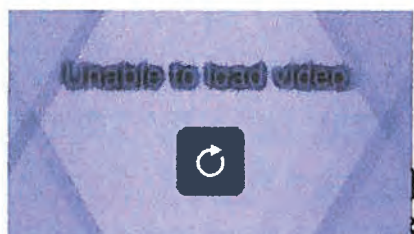
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Brush Fire Alert: Fire threatens Escondido neighborhood

A fire of unknown origin blackened about three acres on a brushy hillside next to Interstate 15 in northern San Diego County Friday, moving dangerously close to homes but causing no reported structural damage.

ESCONDIDO (CNS) - A fire of unknown origin blackened about three acres on a brushy hillside next to Interstate 15 in northern San Diego County Friday, moving dangerously close to homes but causing no reported structural damage or injuries.

The blaze erupted shortly before 12:30 p.m. on the west side of the freeway near Deer Springs Road in the unincorporated Escondido area, according to Cal Fire.

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Ground crews and personnel aboard emergency-services helicopters and air tankers worked to corral the flames and keep them away from nearby houses, getting the spread of the fire halted within about an hour, said Isac Sanchez, a fire captain with the state agency.

The blaze forced the closure of one lane on the southbound side of the interstate and caused heavy congestion in the area through the afternoon, the California Highway Patrol reported.

The cause of the fire remained under investigation as of 5 p.m., Sanchez said.

Fire No 6

May 19, 2017

This fire was near the location of the
planned recycling plant

the fire ws on a hillside nea the Interstate
15

Ground crews, helicopter and air tankers
worked to corral the flames. Homes on the
other side of the hill were saved

Brush fire threatens Escondido neighborhood - CBS News 8 - San Diego, CA

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Brush fire threatens Escondido neighborhood



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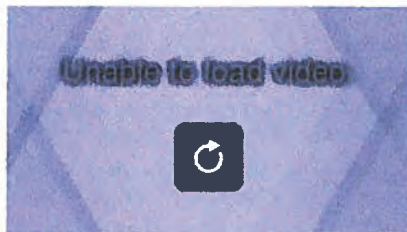
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The blaze forced the closure of one lane on the southbound side of the interstate and caused heavy congestion in the area through the afternoon, the California Highway Patrol reported.

The cause of the fire remained under investigation as of 5 p.m., Sanchez said.

October 1, 2014,

Beth,

I have driven by the sight again and took some pictures of the curve, 15 mile per hour warning and the memorials to the three people killed there. It is such a dangerous curve and so sad to see these crosses. It is hard to get the right pictures however just driving the road tells it all.

If you would take a drive and go down N. Nutmeg Street, turn left onto N Center City Parkway and the 1st left onto Mesa Rock Rd you will see the underpass and there are the crosses on the south side of the road. There is a 15 mile an hour sign across from the memorial.

I had mentioned what a dangerous curve this is for a regular automobile how would trucks be able to use this. There is no restriction as far as truck weight. How would a truck even get under that underpass.

The sight where they are planning on building the Recycling Facility is not far from the 3 crosses and it appears they have already started grading even though there has not been an approval from the county.

Thank you for reading this and please pass it on to the traffic section or anyone you feel should see it. Thank you for your help and patience.

Thank you.

Sylvia Wacknitz

2148 Rockhoff Rd.

Escondido, Ca. 92026

The following attachments:

1. Map from Thomas Bros. showing location of underpass and the curve
2. Pictures of the crosses where three people died on this road
3. Underpass where the crosses are located on Mesa Rock Road.
4. Snapshots of going west around the curve
6. Aerial photos of the area

3-937



3-938



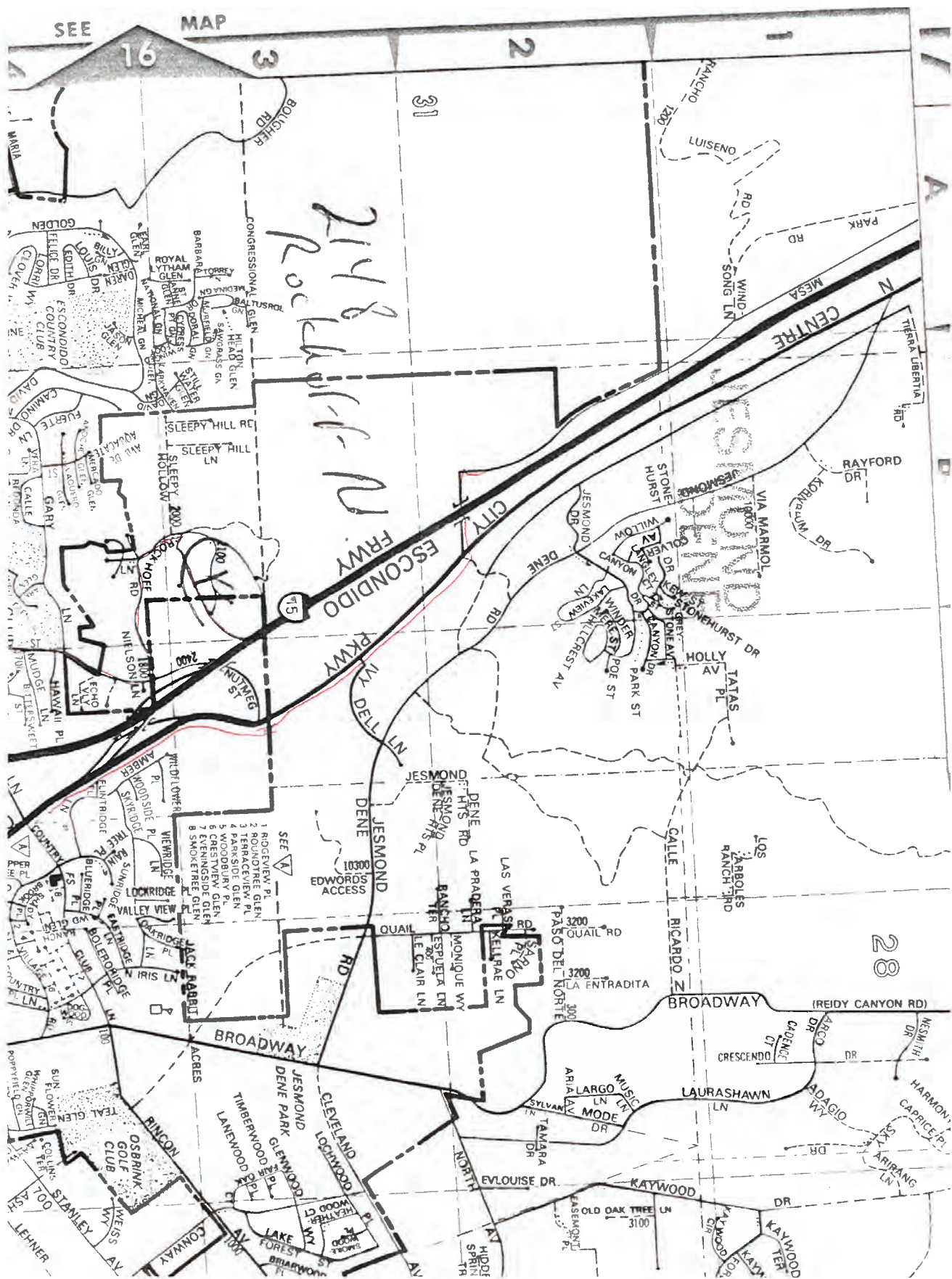
3-939

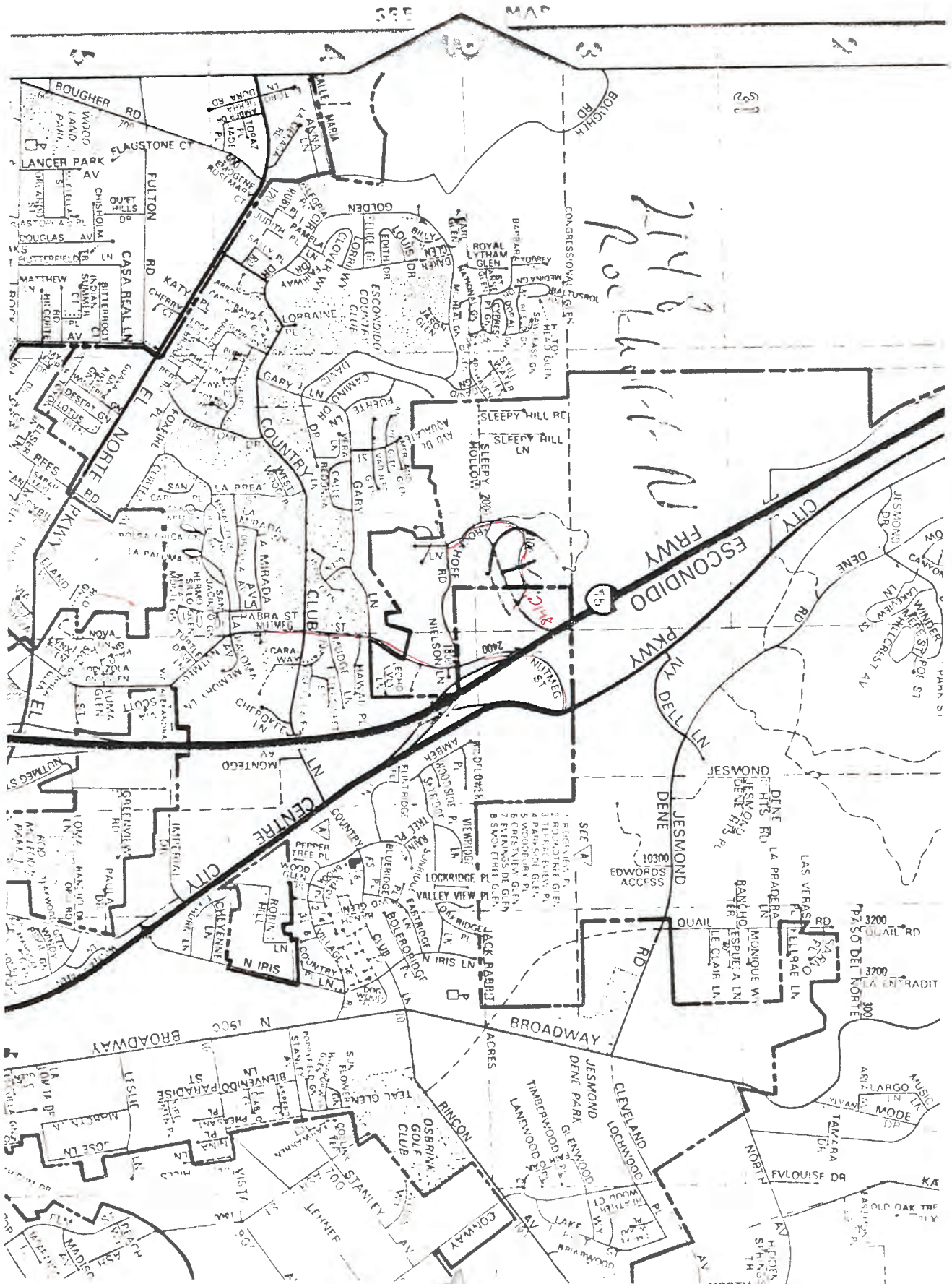


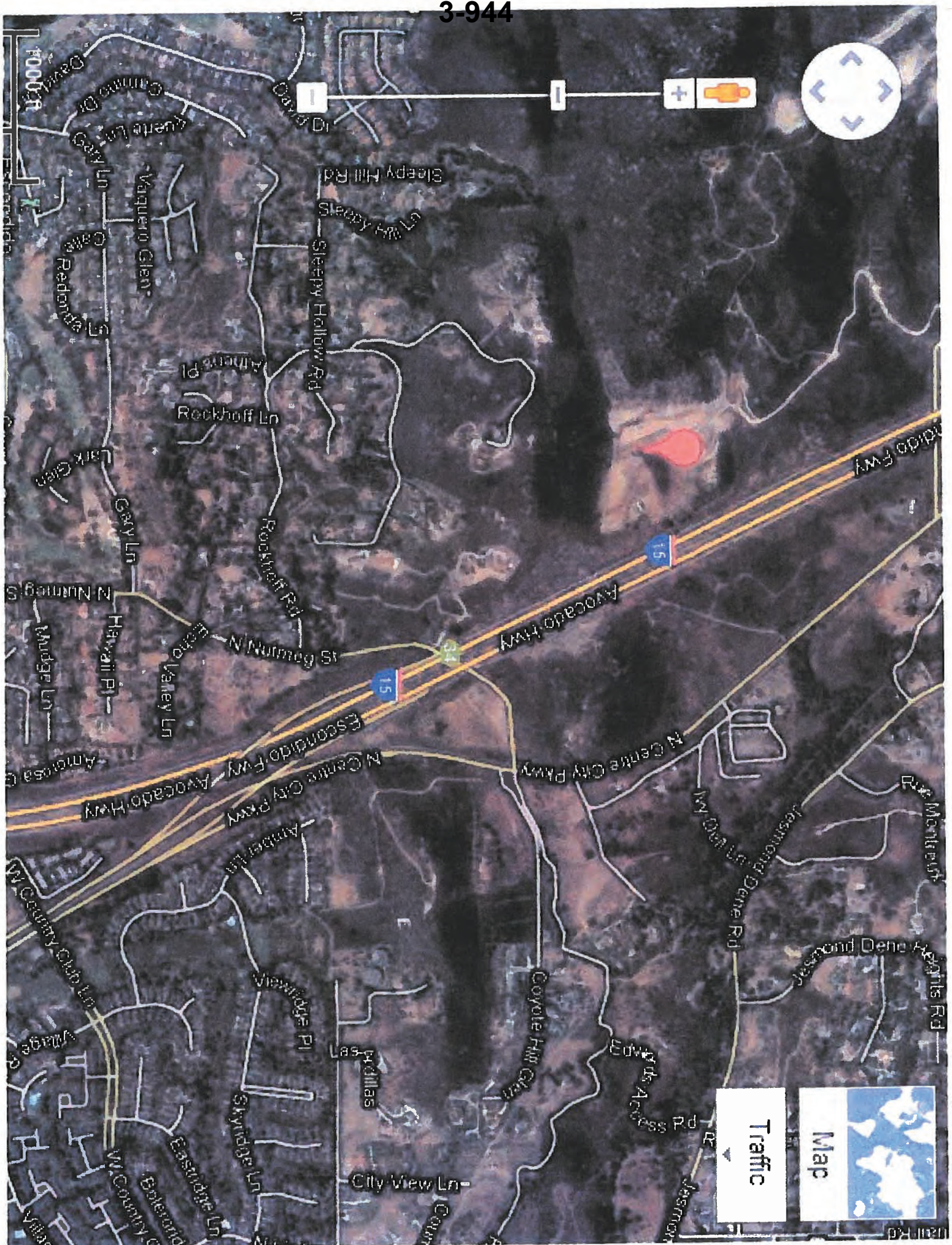



3-941












Map



Traffic

3-945





3-947



3-948



3-949





3-951



Sylvia Wacknitz
2148 Rockhoff Rd.
Escondido, California 92026
760-747-4543

Mark Wardlaw
Planning Director
County of San Diego
5510 Overland Ave. Suite 310
San Diego, Ca. 92123

October 23, 2019

Mark Wardlaw,

I am writing to you about the recycling plant they are planning to build in North Escondido. I am opposed to the recycling plant for several reasons but mainly it is the fire danger.

There was an article in the San Diego Union on October 22, 2019 regarding mailing out disaster plans to people who live in a very dangerous fire area. I am sure they will mail me the information.

I live in a dangerous fire area and with the building of the recycling plant near my home it will become even more dangerous.

I forwarded pictures to David Sibbet of fires that was in the newspaper or TV the last few years where fires were at recycling plants and one fire near where they are planning on building this recycling plant.

Fire #1 Flames leaped at San Marcos recycling facility Nov. 7, 2014

Fire #2 Fire at Spring Valley, Calif. recycling center July 20, 2016

Fire #3 Fire sparks at Lakeside recycling center September 23, 2016
fire crews arrive to find Quality Recycling in flames

Fire #4 A fire burning at a recycling plant in Ontario, October 21, 2016

A fire burning at a recycling plant in Ontario sending a plume of black smoke into the air visible for miles

Fire #5 recycling plant bursts into flames in El Cajon May 16, 2018

Fire #6 Brush fires threatened Escondido neighborhood May 19 2017
this fire was on a hillside near the location of the planned recycling plant.
Ground crews helicopter and air tankers worked to corral the flames.

I use to see a sign that was near where this recycling plant is planned
to be built and the sign said FIRE DANGER. For some reason someone
removed it. I called about that at the time and said I would send a picture
of the sign was told it was not needed.

I am also concerned about the dangerous Mesa Rock Road where 4
teenagers were killed in an automobile. Take a ride down that road
and see the sign 15 miles per hour. This accident was near where the
proposed recycling plant would be built.

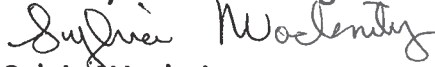
It is hard to imagine large trucks going on that dangerous road safely
without endangering themselves and others. I also have pictures of where
the crosses stand in memory of those young people. I also sent pictures
of the road the signs ect. to David Sibbet.

How about the air with this recycling plant being near all the homes of
people? I am 80 and know this will be a problem with my asthma.

I have lived in this area in our home for almost 50 years. It has been
a wonderful place to live and raise our family. I would like to be
able to live here the rest of my life but I am not now sure that will
happen with this dangerous plant being built.

I am sure you are a wise and caring man who will not just consider just the
businessman but also think of how this will effect so many families, the
young and the old who live in this area.

Thank you for reading this.


Sylvia Wacknitz



sylvia Wacknitz <kkawac39@gmail.com>

Another recycling plant fire1 message

sylvia Wacknitz <kkawac39@gmail.com>

Fri, Nov 8, 2019 at 9:11 AM

To: "Sibbet, David" <david.sibbet@sdcounty.ca.gov>

Dear David Sibbet,

Just a note to let you know that there was another fire at a recycling center.

This one took place on Nov. 3, 2019 at Miramar Plant.

I talked to Souphie and she said to send you the information and you would put it in the file.

I am sending you a copy of the pictures of the fire at the Recycling plant.

I am still amazed that the county would think of approving such a dangerous business to be placed in an area where people can not even get fire insurance.

I could not believe another fire and there it was on NBC 7 Bales of Recycling Material Go Up In Flames at Miramar recycling center.

Please let me know when you receive the information from me that I will mail to you.

Thank you,
Sylvia Wacknitz
2148 Rockhoff Rd.
Escondido Ca. 92026
760-747-4543

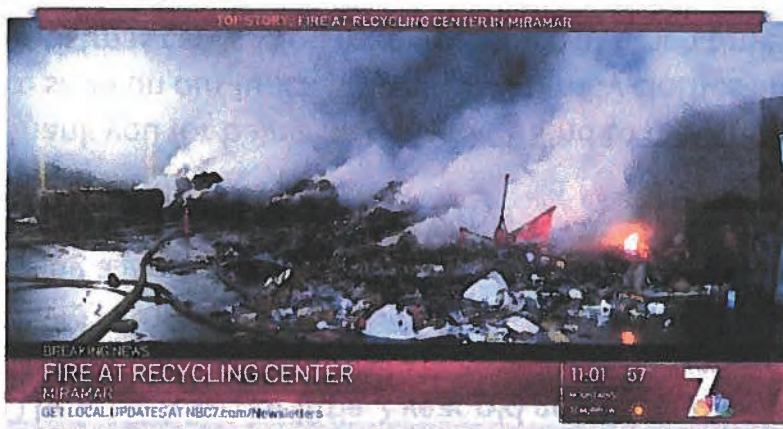
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Bales of Recycled Materials Go Up in Flames at Miramar Plant

Firefighters stayed through the night to crush each packed cube of materials to eliminate any lasting embers

By NBC 7 Staff

Published Nov 3, 2019 at 9:17 PM · Updated 28 minutes ago



NBC 7's Erika Cervantes is live in Miramar with the latest on a fire that started at a recycling center. (Published Sunday, Nov. 3, 2019)

Bales of plastic and cardboard went up in flames at a recycling plant near MCAS Miramar, closing the facility to the public Monday as firefighters worked to clean up the mess.

San Diego Fire-Rescue Department responded to the the Allan Company recycling center on Consolidated Way around 8:30 p.m. Sunday and found pallets of recycled materials burning and billowing smoke into the night.

• [Officials ID Woman Killed in La Mesa Crash, 2 Suspects at Large](#)

The high volume of paper and cardboard was making the firefighting efforts difficult as those materials can burn for a long time, SDFD Deputy Chief Steve Wright said.

Wright said the fire did not pose any threat to the public.

• [\\$10M of Marijuana Seized From Illegal Chula Vista Pot Shop](#)

The fire was contained to the materials in the plant and the building itself did not burn, according to firefighters. The blaze was partially knocked down around 9:30 p.m.

Firefighters stayed through the night to crush each packed cube of materials to eliminate any lasting embers.

[\[UPDATED\]](#) [1 Person Injured as a Fire Sparked in Oceanside Near Nursery](#)

TRENDING STORIES



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[San Diego Boy With Lemonade Stand Finds Unexpected Partner for Good Cause](#)



VIDEO [Driver Identified in National City Crash, Family Speaks Out](#)



['Beer Guy' Moment Worth Estimated \\$8M in Ads. Bud Light Tells How it Happened](#)

WEATHER FORECAST

San Diego, CA [Change](#)



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Radar



Forecast



Maps

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Which do you do more: show up early for an obligation, or show up late?

☐ I show up early more often than late

☐ I show up late more often than early

☐ Does not apply / Other

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There was some concern that the chemicals from the recycled materials could send an odor into the air, but Wright said they were not harmful.

"When the plastics meltdown and burn and everything there could be some carbons from that, but not chemicals to speak of that are toxic in nature," Wright said.



Photo credit: NBC 7/Erika Cervantes

The weather conditions worked in first responders' favor.

"We don't think it's going to be a whole plant going up, out of control," Wright added. "There's hardly any wind, it is dry. It's not bad."

• [RESPOND](#) Is Your Car Under A Recall?

The recycling facility is typically open to the public on weekdays, but the fire forced owners to shutter their doors Monday.

The business sits close to MCAS Miramar, just off Miramar Road and east of Interstate 805.

• [High Rise Takes on Bold Construction Project](#)

No injuries were reported.

The cause of the fire has not yet been determined.

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Sibbet, David

From: ppwarren <ppwarren@cox.net>
Sent: Wednesday, October 02, 2019 12:15 AM
To: Sibbet, David
Subject: Recycling plant near Mesa Rock

Excuse me, but are you nuts? Considering a toxic recycling facility without a full environmental impact review is incredibly irresponsible!
As taxpayers, we will accept nothing less.

Sincerely,
Pam and Mark Warren
10344 Stonehurst Dr.
Escondido, CA 92026

Sent from my Verizon, Samsung Galaxy smartphone

Project Synopsis:

Hilltop Group Inc. is seeking to construct a recycling plant that will process construction and demolition debris, as well as tree trimmings and green waste at 25568 Mesa Rock Road. The peculiar presence of an industrial recycling facility near these residential areas will be disruptive and will have several negative consequences for residents. The project will result in very specific negative effects to an area that was not intended in the spirit of the County Plan or the CEQA submitted. These include:

- Particulate emissions from demolition and leveling on mountain side as well as from operation of crushing and grinding and material handling equipment outdoors
- Noise from explosive blasting during construction phase and then the operation phase of crushing and associated equipment on site.
- Operating hours 5:00 AM till 7:00 PM, not meeting Policy N-5.2 of the General Plan
- Noise and dust from fully loaded trucks entering and leaving site through Mesa Rock Road, Center City Parkway and the Deer Spring overpass.
- Community is burdened with monitoring and reporting violations including gas emissions, noise, dust, or truck loads in and out. Monitoring equipment not included in project.
- Odor from the recycled waste plant.
- Excessive grading of an iconic hill and rock known by residents with affection as Bear Rock.
- A facility to be perched on high level grade in view of over 6100 residents.

Additional concerns I neglected to type:

Loss of value to my home

Sibbet, David

From: Debbie Wilkie <dswilkie@sbcglobal.net>
Sent: Sunday, October 20, 2019 7:45 PM
To: Sibbet, David; Wardlaw, Mark
Subject: North County Environmental Resources Project (Mesa Rock Road)

Dear Messrs. Sibbert and Wardlaw:

Please consider this communication my formal objection to the building of a recycling plant located west of Interstate 15 (I-15) along Mesa Rock Road in the Twin Oaks Community Plan Area, more formally identified as North County Environmental Resources PDS2008-3500-08-015; PDS2013-BC-13-0019; PDSXXXX-HLP-XXX, LOG NO. PDS2008-3910-0808012 (referred to herein as "the project"). I have owned my home in the Escondido Hills area, which is located just south of the proposed building site just east of Centre City Parkway and north of Country Club Lane, since 1981. I have been evacuated three times for fires that have erupted on the hill immediately behind my house. Accordingly, I have significant concerns regarding the fire hazard the project presents to an area that is already rife with fire concerns. In fact, in the past year, many of the homeowners in this development have had their homeowners insurance policies cancelled, by multiple insurance companies who have deemed the area to be a significant fire hazard zone. Accordingly, the installation of the project contemplated by the County is egregious and negligent and potentially puts the residents in the immediate vicinity directly in harms' way. It is my understanding that fires at similar facilities, have already occurred, including but not limited to the following:

- **November 7, 2014:** A major fire occurred at a San Marcos trash and recycling facility
- **July 20, 2016:** A major fire at a Spring Valley recycling center injured a firefighter and damaged homes in the nearby vicinity;
- **September 23, 2016,** fire sparks occurred at a Lakeside recycling center;
- **October 21, 2016,** fire burned at an Ontario recycling plant sending plumes of smoke into the air from wood pallets and a propane tank to explode; and
- **May 16, 2018,** an El Cajon recycling plant burst into flames.

You must also be aware of the fact that as recently as September 14, 2019, fire threatened the Escondido/Deer Springs Road neighborhood just off Interstate 15, within a mile of the proposed North County Environmental Resources proposed project site.

In addition, I expect the applicant to be required to submit a full Environmental Impact Report for the project as the County required in 2015. Planning and Development Services (PDS) is now using the California Environmental Quality Act Section 15183 process which is a less intensive evaluation for project impacts and does not require public input. Given the potential impact of the project on the surrounding area, a full Environmental Impact Report is required.

The project contemplated by Hilltop Group Inc. will process construction and demolition debris as well as tree trimmings and green waste. The peculiar presence of an industrial recycling facility near these residential areas will be disruptive and have a number of negative consequences for local residents which cannot be ignored, and which will result in specific and significant negative effects to an area that was not intended in the spirit of the County Plan or the CEQA submitted, including, but not limited to the following:

3-961

- Particulate emissions from demotion and leveling on the mountain side as well as from the operation of crushing, grinding and material handling equipment outdoors;
- Noise from explosive blasting during the construction phase and then the operation phase of crushing and associated equipment on site;
- Noise and dust from full loaded trucks entering and leaving the site through Mesa Rock Road, Centre City Parkway and the Deer Springs overpass;
- The residential community will be burdened with monitoring and reporting violations including gas emissions, noise, dust, and/or truck loads, as well as monitoring equipment not included in the project;
- Excessive grading of an iconic hill and rock known affectionately by residents as Bear Rock; and
- A facility perched on a high level grade in view of over 6100 residents.

Further, there was insufficient time for the residents effected to adequately review and comment on the hundreds of pages of information submitted by the applicant, and thus a 90-day (minimum) extension of time to comment is requested.

My opposition to the project cannot be stated strongly enough. I know it is difficult to change the course when resources and efforts have gone into a project such as this. I strongly urge you to do so, however, as those expended resources and efforts pale in comparison to those expended by the families living in the area who have so much to lose should the project proceed as contemplated.

Thank you for your anticipated consideration of the foregoing.
Sincerely,

Debra Wilkie
608 Wildflower Place
Escondido, CA 92026

(760) 470-8353

Sent via email and U.S. Mail

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3-962
Debra S. Wilkie
608 Wildflower Place
Escondido, California 92026
(760) 470-8353
dswilkie@sbcglobal.net

October 21, 2019

David Sibbert, Planning Manager and
Mark Wardlaw, Planning Director
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Re: North County Environmental Resources PDS2008-3500-08-015;
PDS2013-BC-13-0019; PDSXXXX-HLP-XXX, LOG NO.
PDS2008-3910-0808012

Dear Messrs. Sibbert and Wardlaw:

Please consider this communication my formal objection to the building of a recycling plant located west of Interstate 15 (I-15) along Mesa Rock Road in the Twin Oaks Community Plan Area, more formally identified as North County Environmental Resources PDS2008-3500-08-015; PDS2013-BC-13-0019; PDSXXXX-HLP-XXX, LOG NO. PDS2008-3910-0808012 (referred to herein as "*the project*"). I have owned my home in the Escondido Hills area, which is located just south of the proposed building site just east of Centre City Parkway and north of Country Club Lane, since 1981. I have been evacuated three times for fires that have erupted on the hill immediately behind my house. Accordingly, I have significant concerns regarding the fire hazard *the project* presents to an area that is already rife with fire concerns. In fact, in the past year, many of the homeowners in this development have had their homeowners insurance policies cancelled, by multiple insurance companies who have deemed the area to be a significant fire hazard zone. Accordingly, the installation of *the project* contemplated by the County is egregious and negligent and potentially puts the residents in the immediate vicinity directly in harms' way. It is my understanding that fires at similar facilities, have already occurred, including but not limited to the following:

- ▶ November 7, 2014: A major fire occurred at a San Marcos trash and recycling facility;
- ▶ July 20, 2016: A major fire at a Spring Valley recycling center injured a firefighter and damaged homes in the nearby vicinity;
- ▶ September 23, 2016, fire sparks occurred at a Lakeside recycling center;
- ▶ October 21, 2016, fire burned at an Ontario recycling plant sending plumes of smoke into the air from wood pallets and a propane tank to explode; and
- ▶ May 16, 2018, an El Cajon recycling plant burst into flames.

You must also be aware of the fact that as recently as September 14, 2019, fire threatened the Escondido/Deer Springs Road neighborhood just off Interstate 15, within

Re: North County Environmental Resources PDS2008-3500-08-015;
PDS2013-BC-13-0019; PDSXXXX-HLP-XXX, LOG NO. PDS2008-3910-0808012
October 21, 2019
Page two

a mile of the proposed North County Environmental Resources proposed project site.

In addition. I expect the applicant to be required to submit a full Environmental Impact Report for *the project* as the County required in 2015. Planning and Development Services (PDS) is now using the California Environmental Quality Act Section 15183 process which is a less intensive evaluation for project impacts and does not require public input. Given the potential impact of *the project* on the surrounding area, a full Environmental Impact Report is required.

The project contemplated by Hilltop Group Inc. will process construction and demolition debris as well as tree trimmings and green waste. The peculiar presence of an industrial recycling facility near these residential areas will be disruptive and have a number of negative consequences for local residents which cannot be ignored, and which will result in specific and significant negative effects to an area that was not intended in the spirit of the County Plan or the CEQA submitted, including, but not limited to the following:

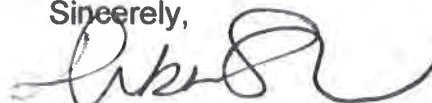
- ▶ Particulate emissions from demotion and leveling on the mountain side as well as from the operation of crushing, grinding and material handling equipment outdoors;
- ▶ Noise from explosive blasting during the construction phase and then the operation phase of crushing and associated equipment on site;
- ▶ Noise and dust from full loaded trucks entering and leaving the site through Mesa Rock Road, Centre City Parkway and the Deer Springs overpass;
- ▶ The residential community will be burdened with monitoring and reporting violations including gas emissions, noise, dust, and/or truck loads, as well as monitoring equipment not included in the project;
- ▶ Excessive grading of an iconic hill and rock known affectionately by residents as Bear Rock; and
- ▶ A facility perched on a high level grade in view of over 6100 residents.

Further, there was insufficient time for the residents effected to adequately review and comment on the hundreds of pages of information submitted by the applicant, and thus a 90-day (minimum) extension of time to comment is requested.

My opposition to the project cannot be stated strongly enough. I know it is difficult to change the course when resources and efforts have gone into a project such as this. I strongly urge you to do so, however, as those expended resources and efforts pale in comparison to those expended by the families living in the area who have so much to lose should the project proceed as contemplated.

Thank you for your anticipated consideration of the foregoing.

Sincerely,



Debra Wilkie

Sibbet, David

From: Roger Wildenstein <roger@ceramistone.com>
Sent: Monday, September 30, 2019 2:24 PM
To: Desmond, Jim; Wardlaw, Mark
Cc: Sibbet, David; benjamin.mills@sdcounty.c.gov
Subject: 25568 Mesa Rock Rd - PDS2008-3500-08-015

Re; North County Environmental Resources Site Plan I15 Review, S.O. PDS2008-3500-08-015, Log No. PDS2008-3910-0808012

Gentlemen,

Please do not issue a use permit for this project. I used to own a recycle center in Oceanside and I know how hazardous they are. The environmental impact of a facility this size is enormous! I am talking about Air pollution, ground water contamination, run off contamination and noise just to name a few. A facility for this kind of processing needs to be in an industrial zone not amongst million dollar residences. Besides that I live on the east side of this proposed project with prevailing winds out of the west every day and I don't want to smell it! And neither do my neighbors!

This project needs to have a Full EIR done to show the impact it will have. Once done this project would not be approved. We need recycling centers to reduce damage done to our planet for sure. But we need to do it responsibly. Centers like this need to be completely contained and located in an industrial zone not in the middle of residences. Look at EDCO's facility in Escondido. They have made a great effort to contain the materials but it still gets out and when it rains the soil is contaminated along with ground waters and finally the ocean. At least there in an industrial zone, run off can be collected and cleaned at water treatment plants.

All the Best!

Roger Wildenstein

Ceramistone International, Inc.
590 Airport Rd.
Oceanside, Ca 92058

m)760-505-7866
o) 760-754-6700
f) 760-681-5664
www.ceramistone.com

Sibbet, David

From: Carolyn Winters <cdfwinters@yahoo.com>
Sent: Friday, October 25, 2019 3:39 PM
To: Sibbet, David
Subject: Opposed to the Concrete Crushing and Wood Recycling Plant

David,

I am writing in opposition to the proposed Concrete Crushing Facility off Deer Springs in Escondido.

From what I have seen, I am concerned about the air borne dust and gas emissions as well as the sound projection. I am new to Escondido and have purchased a new construction home in an area that is quiet and clean and am concerned how this Facility will impact those features.

I am open to hear/see what you are proposing to mitigate these concerns however based on the information I have, please accept this notification as an official opposition.

Thank you

Carolyn Winters
510-813-5380 cell

CAUTION: This email originated from outside of the County network. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you are unsure, forward the email to spam.protection@sdcounty.ca.gov.

Sibbet, David

From: chickeyrose@aol.com
Sent: Sunday, October 06, 2019 3:15 PM
To: Sibbet, David
Subject: RECYCLING FACILITY ON WEST SIDE OF I-15

Mr. David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

Dear Mr. Sibbet,

RE: PROJECT TO BUILD A RECYCLING FACILITY ON THE WEST SIDE OF I-15

Recently we were notified that the County intends to accept a California Environmental Quality Act (CEQA) report, streamlining the acceptance rather than requiring a full (EIR) Environmental Impact Report – meaning the construction is moving forward at this point. The (CEQA) exemption document is riddled with inaccuracies and refers to documents provided by the developer as old as 2014. **We need to point out incorrect view, noise and air quality impact called out as having “no impact to our community health.”**

We've been through this fight before in our neighborhood and are tired of fighting, only to have, after 6 years of fighting, high density housing dumped on our former golf course in the Country Club area. Now we have this new doomsday project looming over us. We know now that BIG MONEY ALWAYS WINS OUT.

Please listen to the concerns of the people in the neighborhoods that will be impacted by a decision to go ahead with the building of this facility so close to residential neighborhoods. Besides the detrimental impact of all the traffic and resulting poor air quality associated with the massive building on the golf course, among other things we will now have to endure the unhealthy air quality associated with the building of this recycling facility.

HERE ARE THE MANY REASONS NOT TO PERMIT THIS PROJECT TO GO FORWARD:

Air Quality: Possible negative health consequences due to decreased air quality and a lack of emissions monitoring from this site. Emission of silica dust from concrete crushing and handling operations on the facility is a particular concern. Those downwind from the facility may be significantly impacted by particulates and other contaminants in the air– the prevailing winds in our area blow directly from the project site to our neighborhoods. The impacts will extend to areas along Mesa Rock Road and Centre City Parkway because of the truck traffic carrying the waste material to the site.

Air Quality Monitoring: The project scope is severely lacking in terms of appropriate monitoring and alert systems for emissions. There is a vagueness regarding the rate at which the processing equipment will operate. Emissions are directly related to the operating rates and these must be made specific enough to properly calculate emissions. The applicant states that they will ship 2 truckloads – 48 tons/day of product, half of which will be crushed aggregate from construction debris. The site is allowed to receive 174 tons/day of product- the facility could accumulate a week's worth of incoming material and process it in less than a day, thus grossly exceeding particulate threshold limits of 100 lbs./day for PM10. Emissions should be calculated on the basis of operating capacity of the processing equipment used on site and the hours of operation allowed per day.

Production: The applicant claims that 48 tons of material will be produced daily, and the environmental impact reports submitted are based on that level of output. The applicant is legally allowed to produce 174 tons daily which would vastly increase impacts to the surrounding area and render their submitted environmental reports invalid. If the applicant's production levels are not capped at the current estimate of 48 tons per day, the environmental studies submitted the County are no longer accurate or valid in terms of representing real-life levels. It appears the production levels may have been purposely lowered to a point where the established General Plan EIR mandates are complied with.

Even if the production levels are limited to 48 tons/daily, enforcement to ensure compliance with that standard would be left to County Code Enforcement. Residents have had some experience with code enforcement and understand they are overworked and understaffed. We have little confidence any meaningful enforcement will be forthcoming.

Noise: Machinery capable of delivering and processing concrete and other building materials operating between the hours of 5am to 7pm, Monday through Saturday. These operating hours are far outside the mainstream of other similar businesses. The residential area around the facility would be severely impacted – residents may not be able to enjoy their property, particularly outside.

According to the applicant's own report, the Supplementary Noise Technical Analysis (page 3), the anticipated nighttime noise may exceed established County limit of 57.5 decibels. When operated together, the wheel loader and C&D crusher will emit 58 decibels of sound according to the report. Since the plans submitted for the site do not contain a description of the types of machinery being employed, we believe the noise levels cannot be accurately estimated by the applicant's consultant.

The estimates provided in the report do not appear to have been tailored to this specific site. The area around the proposed center is shaped like an amphitheater – the sound will be reflected toward the neighborhoods to the east, and unless that feature has been considered, the noise estimates in the acoustic study may be lower than reality. There was no mention of the hills affecting the sound in the report. The only mentions of topography was the mitigating effects of hills between the site and the neighborhood to the east.

Traffic: Heavily loaded incoming and outgoing trucks will travel the roads parallel to Interstate Highway 15 on the west and east sides, with corresponding engine emissions and dust released from the cargo. The communities along these roads will be impacted by this traffic and the service life of the roads will be significantly affected. Tractor trailers and other heavy vehicles.

The Minnesota Department of Transportation published a study that indicates heavily-laden trash trucks and semi-tractor-trailers are responsible for wear on roadways that is hundreds of times greater than ordinary passenger vehicles. (<https://www.lrrb.org/pdf/201432.pdf> page 9). Mesa Rock Road has little heavy truck traffic currently, but this site will cause a substantial increase.

Full Environmental Impact Report: Our concerns will be covered more thoroughly if the applicant is forced to produce a full Environmental Impact Report about the project. The County determined the full report was necessary in 2015. The applicant is attempting to use the California Environmental Quality Act (CEQA) process to provide minimal information in an attempt to satisfy existing County environmental standards. Given the potential impact of the project on the

surrounding area, a full Environmental Impact Report should be required. One of our resident/subject matter experts believes the process is not in keeping with the requirements of Title 14, Chapter 3 of the California Code of Regulations.

Production Levels: In the opinion of experienced business owners, this project is not economically viable with outgoing shipments of 2 truckloads/day considering the scope of land improvement/capital expenditure being undertaken, the facilities needed for that level of productivity, and operating costs to include employee pay and benefits and taxes. Future increases in processing of materials is likely; this will result in a higher level of impact to the surrounding area than is being estimated in the applicant's submittals to the Planning and Development Department.

Fire:

There is a significant risk of fire in the area of this project. Several residents have had their fire insurance cancelled, some more than once. At the same time, recycling centers in Southern California appear to have a propensity for fire:

San Marcos Nov. 7, 2014 – Fire at San Marcos trash and recycling facility: <https://www.nbcsandiego.com/news/local/Flames-Leap-from-Trash-Pile-at-San-Marcos-Waste-Facility-281994841.html>

Spring Valley, August 2, 2016 - Fire at recycling center

injures firefighter, damages home <https://patch.com/california/lamesa/firefighter-injured-fire-spring-valley-recycling-center>

Lakeside, September 23, 2016 Fire at recycling center <https://www.cbs8.com/article/news/explosion-sparks-fire-at-recycling-plant-in-lakeside/509-57239699-966c-426e-90a8-62d5abd105b5>

Ontario, October 21, 2016 Fire at recycling center

<https://www.cbsnews.com/news/recycling-plant-fire-in-ontario-southern-california-burns-out-of-control/>

El Cajon May 16, 2018, Recycling plant bursts into flames <https://www.10news.com/news/recycling-plant-bursts-into-flames-in-el-cajon>

Fire at the project site during a Santa Ana wind condition could easily lead to fire racing up the hills to the east and impacting San Marcos' residential areas.

Delay in Review Period: The hundreds of pages of information submitted by the applicant cannot be adequately reviewed by residents in the 30-day time period allowed by the Planning and Development department – the comment period is closing on October 28, 2019. We should have at least 90 days to examine the documentation and fully understand the impacts on our neighborhoods.

Need for Facility of This Type: There are other similar facilities less than 10 miles away from this location that can provide the required service to those who need it. There is no benefit to the surrounding neighborhood from having a recycling center at this location. The site will not be open to the public, so we cannot even take advantage of its services with our own waste at that location.

Zoning: Spot zoning is often described as “the process of singling out a small parcel of land for a use classification totally different from that of the surrounding area for the benefit of the owner of such property and to the detriment of other

owners."^[1] This appears to be a classic case of spot zoning. Michigan State University identified four criteria to indicate spot zoning:

- The area is small compared to districts surrounding the parcel in question.
- The new district allows land uses inconsistent with those allowed in the vicinity.
- The spot zone would confer a special benefit on the individual property owner not commonly enjoyed by the owners of similar property.
- The existence of the spot zone conflicts with the policies in the text of the master plan and the future land use map.

https://www.canr.msu.edu/news/how_to_spot_a_spot_zoning

San Diego County General Plan Goal LU 16.2 - Integrity of Waste Management Facilities.

Avoid encroachment of incompatible land uses upon solid waste facilities in order to minimize or avoid potential conflicts. <https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/GP/LandUseElement.pdf>

San Diego County General Plan

CHAPTER 3 LAND USE ELEMENT

COUNTY OF SAN DIEGO GENERAL PLAN 3-16

High-Impact Industrial.

This designation provides for freestanding industrial development in areas with access to key transportation corridors at a maximum FAR of 0.35. Typical uses within this designation are similar to those of the Medium Impact Industrial designation and include: manufacturing, processing, and assembly; warehousing and distribution; large equipment supply and sales; and other industrial and commercial activities that are generally incompatible with dissimilar adjacent land uses. However, the off-site impacts of industrial uses in this designation are likely to be more significant due to process, product, and reliance on outdoor operations or storage of process materials and product. Therefore, this designation may be incompatible with most Village areas and must be thoughtfully applied in any location in the unincorporated area. In certain limited circumstances it may be designated near the periphery of Village areas where the industrial use is isolated from residential and commercial designations and all allowed uses are adequately screened and buffered to eliminate unacceptable off-site impacts. Secondary support uses are also allowed in this designation, including related business and industrial services.

<https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/GP/LandUseElement.pdf> Page 16 on the web or 3-16 in hard copy

From: **Foothill Communities Coalition v. County of Orange (2014) 222 Cal.App.4th 1302**

"The `rezoning of property, even a single parcel, is generally considered to be a quasi-legislative act' thus `subject to review under ordinary mandamus.' The standard for review of a quasi-legislative act is whether the action was `arbitrary or capricious or totally lacking in evidentiary support.'"

This Site: The applicant in this case asked for his parcels to be rezoned from semi-rural residential to high-impact industrial use with classification M54. From the San Diego County Zoning Ordinance Summary at <https://www.sandiegocounty.gov/pds/zoning/formfields/PDS-444.pdf> Page 4:

"M54 – General Impact Industrial. Allows unenclosed commercial and industrial operations having potential nuisance characteristics such as construction sales and services"

From the **County of San Diego Use Regulations** found at: <https://www.sandiegocounty.gov/content/dam/sdc/pds/zoning/z2000.pdf>

Page 11-14

"M54 GENERAL IMPACT INDUSTRIAL USE REGULATIONS 2540 INTENT.

The provisions of Section 2540 through Section 2549, inclusive, shall be known as the M54 General Impact Industrial Use Regulations. The M54 Use Regulations are intended to create and preserve areas where manufacturing and industrial uses not having high nuisance characteristics may locate."

"M54 Use Regulations would be applied near rail and trucking facilities, or other locations where impacts associated with noise, odor and traffic would not impact on residential or commercial areas."

[1] Anderson's American Law of Zoning, 4th Edition, § 5.12 (1995)

Respectively Submitted,

Robert & Rosemarie Woldin

1471 Vaquero Glen, Escondido 92026

Sibbet, David

From: Laurie Wood <bwood@auswood.com>
Sent: Sunday, October 27, 2019 3:21 PM
To: Sibbet, David
Subject: NCER Project Objection - 25311 Jesmond Dene Rd, Escondido
Attachments: 2019-27-10 NC Environmental Resources Recycling Project Objection Letter 25311.pdf

Dear Mr. Sibbet,

Please find attached a letter of objection to the proposed North County Environmental Resources Project.

Sincerely,

Laurie Wood
Owner,
25311 Jesmond Dene Rd
Escondido CA 92026

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Sibbet, David

From: Laurie Wood <bwood@auswood.com>
Sent: Sunday, October 27, 2019 3:21 PM
To: Sibbet, David
Subject: Objection to Proposed NCER Project
Attachments: 2019-27-10 NC Environmental Resources Recycling Project Objection Letter 25315.pdf

Dear Mr. Sibbet,

I am the owner and resident at 25315 Jesmond Dene Rd, Escondido. Please find attached a letter of objection to the proposed North County Environmental Resources Project.

Sincerely,

Laurie Wood
25315 Jesmond Dene Rd
Escondido CA 92026

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David Sibbet,
Planning Manager,
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
via mail and email to David.Sibbet@sdcounty.ca.gov

Re. NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008-3500-08-015, LOG NO. PDS2008-3910-0808012

October 27, 2019

Dear Mr. Sibbet,

As the owner of the property at 25311 Jesmond Dene Road, Escondido, I write to voice my objection to the proposed North County Environmental Resources (NCER) ("Project"). I have previously (October 2014) provided comments on the Notice of Preparation for an Environmental Impact Report. Having done that, I am dismayed that the County, having determined that the Project requires an EIR, now proposes to fast-track environmental review of the Project through an unsupported and inapplicable exemption to limit public participation contrary to CEQA's requirements.

I submit this public comment letter concerning the proposed section 15183 exemption ("Proposed Exemption") as the County of San Diego ("County") should require the applicant, Hilltop Group Inc. ("Applicant"), to prepare an Environmental Impact Report ("EIR") for the Project due to its foreseeable significant environmental impacts which will impact my family's and my community's health and well-being.

My house on the property directly overlooks the proposed site, across I-15 from the East. There are no hills or other natural obstructions to provide any substantial visual or noise protection. Note that I also own an adjoining property at 25315 Jesmond Dene Road, the subject of separate correspondence.

My family have owned and lived at this property for more than 50 years. It is my belief that if the project goes ahead we will be adversely affected by it in many ways. Aside from substantial impact on the value of my property, it will we believe generate very significant noise, dust, and other environmental pollution. In addition to that and the visual impact, we are greatly concerned by the proposed hours of operation 5am -7pm six days a week contrary to General Plan Policy N-5.2.

Specifically, the peculiar presence of an industrial processing facility largely surrounded by residential areas will be disruptive and have myriad significant environmental consequences on nearby residents, including:

- Particulate emissions from demolition and leveling on mountain side as well as from operation of crushing and grinding and material handling equipment outdoors.

- Noise from explosive blasting during construction phase and then the operation phase of crushing and associated equipment on site.
- Operating hours of 5:00 AM - 7:00 PM, 6 days a week contrary to General Plan Policy N-5.2.
- Noise and dust from fully loaded trucks entering and leaving site through Mesa Rock Road, Center City Parkway and the Deer Spring overpass.
- Community is burdened with monitoring and reporting violations including gas emissions, noise, dust, or truck loads in and out. Monitoring equipment not included in project.
- Excessive grading of an iconic hill and rock known by residents with affection as Bear Rock.
- A facility to be perched on high level grade in view of over 6100 residents.

It is inappropriate for the County to base proposed findings supporting the Proposed Exemption on technical reports, many of which are five to ten years old and do not reflect existing baseline conditions, and others which are explicitly drafts or preliminary in nature. The alleged findings of these unreliable reports do not support the necessary findings for the Proposed Exemption. Moreover, many of the technical reports speciously base their analysis on how the Applicant says it will operate the Project instead of the maximum physical uses, thereby violating CEQA's mandate that the worst-case scenario be used to assess a project's foreseeable environmental impacts and wrongly allowing the reports to minimize the Project's impacts. An EIR is needed to ensure that these concerns are addressed and so there is public transparency for this highly-controversial project.

In summary, I object to the Project and believe that if it were to proceed it would have very substantial negative impact on our residential amenity, health, and general wellbeing. I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw.

Sincerely,

Laurie Wood
25311 Jesmond Dene Rd
Escondido CA 92026

David Sibbet,
Planning Manager,
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
via mail and email to David.Sibbet@sdcounty.ca.gov

Re. NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008-3500-08-015, LOG NO. PDS2008-3910-0808012

October 27, 2019

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Laurie Wood
25315 Jesmond Dene Rd
Escondido CA 92026

David Sibbet,
Planning Manager,
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
via mail and email to David.Sibbet@sdcounty.ca.gov

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October 27, 2019

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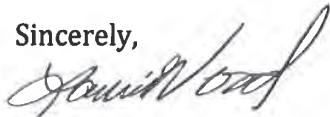
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In summary, I object to the Project and believe that if it were to proceed it would have very substantial negative impact on our residential amenity, health, and general wellbeing. I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw.

Sincerely,



Laurie Wood
25311 Jesmond Dene Rd
Escondido CA 92026

Sibbet, David

From: Ozzie Ahlers <fingers@ozzieahlers.com>
Sent: Tuesday, October 29, 2019 12:47 PM
To: Sibbet, David
Subject: Opposition to Concrete Facility
Attachments: Opposition to Concrete Facility

CAUTION: This email originated from outside of the County network. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you are unsure, forward the email to spam.protection@sdcounty.ca.gov<mailto:spam.protection@sdcounty.ca.gov>.

Date:

Oct. 11, 2019

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

I live an area that will suffer significant impacts from the proposed North County Environmental Resources project (Project). I submit this public comment letter concerning the proposed section 15183 exemption ("Proposed Exemption") as the County of San Diego ("County") should require the applicant, Hilltop Group Inc. ("Applicant"), to prepare an Environmental Impact Report ("EIR") for the Project due to its foreseeable significant environmental impacts which will impact my family's and my community's health and well-being. I am dismayed that the County, having determined in 2015 that the Project requires an EIR, now proposes to fast-track environmental review of the Project through an unsupported and inapplicable exemption to limit public participation contrary to CEQA's requirements.

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed,



Print Name,

DAVID O. ANDERS

Address,

1711 Muirfield Glen Escondido 9202

1

I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Tony Alfaro

Address, 10140 Via Marmol, Escondido, CA 92026

--

Tony Alfaro

858-880-3333-Mobile

talfaro61@gmail.com

Date: 10/28/2019

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, Beth Ann AvelPrint Name, Beth Ann AvelAddress, 2522 Buena Vista92026

Additional project concerns:

It will be messy w/ the dust
& killing plants & displacing animals -
Ruining the hill view & natural
landscape.

Sibbet, David

From: Beth Alitt <bethannsd@gmail.com>
Sent: Monday, October 28, 2019 10:39 AM
To: Sibbet, David; Wardlaw, Mark
Subject: North County Environmental Resources Project PDS 2008-3500-08-015
Attachments: Concrete letter 2.pdf; Concrete letter 1.pdf

Hi and please see the attached letters regarding the concrete project across the street from my home. I am a small business owner and a resident of 92026.

This project is unbelievable. For several reasons:

Fire hazard due to the blasting (like we don't have enough fire issues in our area)
Ruining the iconic view of the hills and the rocks which may also be an Indian burial ground.
Killing of CA native plants
Displacement of wild animals
Increased heavy truck traffic on roads not suited nor built to accommodate such weight or volume
The dust and pollutants that will be in the air due to the concrete crushing. There are many elderly facilities in view of this project, including Las Villas del Norte, the Salvation Army senior living and Via Monticello.
NO full environmental impact report was done and the partial one that I read was absolutely flawed on so many levels I was shocked it was ever even seriously considered as a relevant review.
Night hours of blasting
There are 2 identical facilities withing 10 miles....why is a 3rd one needed and why on a lovely hillside by HUGE residential neighborhoods and senior centers?

I hope you both review and reconsider the concrete plant. It is wrong.

Sincerely,

Beth Ann Alitt

Beth Ann Alitt
Alitt Insurance Agency Inc
555 W. Country Club Lane, Ste C-184
Escondido, CA 92026

760-510-0009 ph
760-683-3353 efax
License # 0752419

**** NO COVERAGE IS BOUND UNTIL CONFIRMED BY AN AGENT****
EMAILING A REQUEST TO BIND DOES NOT CONSTITUTE COVERAGE IS IN PLACE

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Date: 10/27/19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, Carolyn Alvarez

Print Name, CAROLYN ALVAREZ Address, 2751 QUAIL RD, ESCANDIA

Additional project concerns:

ALLERGIES & HEALTH CONCERNS FOR ELDERLY
PARENT WITH COPD.

HORSES & ANIMALS STRESSED FROM NOISE.

DISTURBANCE TO QUIET ENJOYMENT - REASON FOR
PURCHASING HOME IN AREA.

REDUCED VALUE TO HOME.

Sibbet, David

From: Carolyn Alvarez <calvarez@propadvantage.com>
Sent: Monday, October 28, 2019 10:44 AM
To: Sibbet, David
Subject: RE: NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008-3500-08-
Attachments: SBusiness C19102809530.pdf

Dear Mr. Sibbet:

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Signed, see attached for signed copy & additional concerns

Print Name, _____ Address, _____

Kind Regards,
 Carolyn Alvarez

3-990

Carolyn Alvarez, *Property Manager*
PropertyADVANTAGE SM
419 South Coast Highway, Oceanside, California 92054

760.585.1780 *direct office* • 760-585-1700 *office*
760.722-3779 *fax*
www.propadvantage.com
CA BRE License 01857991

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Date: 10/21/15

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, Barbara KennyPrint Name, Barbara KennyAddress, 1795 Lemon Tree Ct San MarcosCA
92078

Date: 10-24-2019

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, Alan M. Barnett

Print Name, ALAN M. BARNETT Address, 2136 ROYAL LUTHERAN GLEN, ESCONDIDO CA 92026

Sibbet, David

From: Peg Basom <mbasom@gmail.com>
Sent: Monday, October 07, 2019 2:50 PM
To: Sibbet, David
Subject: NC Environmental Site Plan review PDS2008- 3500-08-015, LOG NO.
PDS2008-3910-0808012
Attachments: Scan 2019-10-7 14.35.41.pdf

Re:

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO.
PDS2008-3910-0808012

Please see enclosed

Date: 10/7/19

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, Margaret B. Basom

Print Name, Margaret Basom Address, 1053 Crimson Dr
San Marcos CA 92069

Date: 10-10-19

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed, Ronald Beale

Print Name, Ronald Beale

Address, 3165, N. Broadway
Escondido, CA 92026

Additional project concerns:

I am totally amazed that this project has got this far! Surrounded by Residential & a care facility close by. Dust, noise, traffic, etc. The impact would be beyond belief.

Rh Benke

Date: 10-24-2019

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, Marlene Beard

Print Name, MARLENE BEARD Address, 1823 CONGRESSIONAL GLEN
ESCONDIDO, CA
92026

Date: 10.21.19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

I live an area that will suffer significant impacts from the proposed North County Environmental Resources project (Project). I submit this public comment letter concerning the proposed section 15183 exemption ("Proposed Exemption") as the County of San Diego ("County") should require the applicant, Hilltop Group Inc. ("Applicant"), to prepare an Environmental Impact Report ("EIR") for the Project due to its foreseeable significant environmental impacts which will impact my family's and my community's health and well-being. I am dismayed that the County, having determined in 2015 that the Project requires an EIR, now proposes to fast-track environmental review of the Project through an unsupported and inapplicable exemption to **limit public participation** contrary to CEQA's requirements.

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WHAT IS 'LIFE' OF THIS LOCATION?
 The peculiar presence of an industrial processing facility largely surrounded by residential areas will be disruptive and have myriad significant environmental consequences on nearby residents, including:

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- A facility to be perched on high level grade in view of over 6100 residents.

I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, *Dea Bell*

Print Name, DEA BELL Address, 1137 CONGRESSIONAL CIRCLE
ESQ. 92024

Date: 10-27-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed, Alan Berkowitz

Print Name, Alan Berkowitz Address, 25522 Avenida 14c
Escondido, CA 92026

Additional project concerns:

Date:

10/24/19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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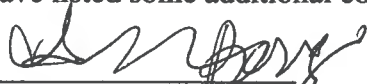
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Signed,



Print Name,

Debbie Berg

Address,

257 Rue Ma...

Date: 10.11.19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed, Denise R. Bergeron

Print Name, Denise Bergeron Address, 2409 Country View
Glen, 92026, Escondido
CA

Additional project concerns:

Noise + gas emissions along with
dust + excessive grading will directly
affect my family + our quiet exclusiv
neighborhood.

Date: 10-12-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed, Print Name, JOHN BITTENGGERAddress, 1751 Doral St.

Sibbet, David

From: Kim Blackwell <kim2blackwell@gmail.com>
Sent: Sunday, October 27, 2019 7:01 AM
To: Sibbet, David
Subject: NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008-3500-08-015, LOG NO. PDS2008-3910-0808012
Attachments: David Sibbet Planning Manager.docx

10-27-19

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

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Kim Blackwell
10345 Greystone Ave.
Escondido, CA 92026

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10-27-19

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County of San Diego - Planning and Development Services
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Kim Blackwell
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Date: 10-12-19

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Signed, David G. Blythe

Print Name, DAVID G. BLYTHE Address, 1618 JOSE LN. ENCINITAS

CA 92026

Date: 10/12/2019

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed, Carl Bobbitt

Print Name, C. EARL BOBBITT Address, 1731 SAWGRASS GLEN

Sibbet, David

From: patricia borchmann <pborchmann9@gmail.com>
Sent: Wednesday, October 23, 2019 3:46 PM
To: Sibbet, David
Cc: patricia borchmann; Jerry Harmon
Subject: 2 Opposition statements, North County Env. Resources (Hilltop Group), Recycling proposal Mesa Rock Road
Attachments: img002.jpg; img003.jpg

David Siebbet@sdcounty.ca.gov -

2 digital files - attachments

Opposition statements on North County Env. Resources (Hilltop Group), Recycling proposal Mesa Rock Road

Patricia Borchmann
Andrea Seavey

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NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, Patricia Borchmann

Print Name, PATRICIA BORCHMANN Address, 1141 CARPENTERS WOOD GLEN
FRANCO CA 92026

Sibbet, David

From: whsox@cox.net whsox@cox.net <whsox@cox.net>
Sent: Monday, October 28, 2019 4:01 PM
To: Sibbet, David
Subject: NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW
Attachments: Letter to county-Hilltop Project.docx

Good Afternoon Mr Sibbet,

Please see attached letter.

Thank you

William Bowersox

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October 28, 2019

David Sibbet, Planning Manager
David.Sibbet@sdcounty.ca.gov
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed: William Bowersox
25240 Jesmond Dene Heights Place
Escondido, CA 92026

Additional project concerns:

Data prepared by Hilltops consultants is very misleading and should not be used to avoid the EIR process.

This is major facility. Project needs to be reviewed by the county Agriculture department. There is a high probably of vectors (insects) being in the recycle product. Which could spread to the Counties agricultural produce.

I could go on and on, but these are my main concerns . Please read them carefully and act accordingly.

Vicki Broughton 2191 Rockhoff Rd Escondido, CA 92026

Sibbet, David

From: Phil Broughton <pbroughton@cox.net>
Sent: Thursday, October 17, 2019 1:38 PM
To: Sibbet, David
Subject: NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008-3500-08-015, LOG NO. PDS2008-3910-0808012

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10/17/19

David Sibbet, Planning Manager via email to David.Sibbet@sdcounty.ca.gov

County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw.

Phillip H. Broughton

2191 Rockhoff Rd

Escondido, CA 92026

pbroughton@cox.net

Date: _____

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed, Barbara Brownell

Print Name, BARBARA BROWNELL

Address, 2233 HILTON HEAD CLUB

Escondido

Date: 10/24/2019

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed,

Margaret Bruecker + Stefan Bruecker

Print Name,

Margaret Bruecker Address, 2367 Lochridge Pl
Stefan Bruecker Escondido CA 92026

Date: 10/25/19

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

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Signed, Kenneth Byerly

Print Name, Kenneth Byerly Address, 2372 Lochridge Pl.
Escondido, Ca 92026

Date: 10-21-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed, Carole CentanniPrint Name, CAROLE CENTANNIAddress, 650 S. RANCHO SANTA FE #340
SAN MARCOS, CA 92078

Date: Oct 14 2019

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed, Janice Chamberlain

Print Name, Janice Chamberlain Address, 2156 Royal Lytham Glen
Esc 92026

Date: 10.7.19

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 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed, Print Name, Carlton CasmanAddress, 1011 Memory Ln.Enc CA 92026

Date: _____

David Sibbet, Planning Manager
County of San Diego - Planning and
5510 Overland Avenue, Suite 310
San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

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Signed, Radney Cook

Print Name, Rockney Cook Address, 2349 Lockridge Pl.
Escondido, CA, 92026

Date: 10-13-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed, James F. Cox

Print Name, James F. Cox Address, 1717 Cypress Point Glen
Escondido, CA 92026

Date: 10/24/2019

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. ~~I have listed some additional concerns on the reverse of this page.~~

Signed,

Print Name,

YUON DACAYANA

Address,

11151 Boulder PassEscondido, CA 92026

Address, 2507 Starlight Glen
Escondido CA 92026-3860

Date: 10/21/19

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

I am a resident who will be affected by the North County Environmental Resources project ("Project"). I submit this public comment letter concerning the proposed section 15183 exemption ("Proposed Exemption") as the County of San Diego ("County") should require the applicant, Hilltop Group Inc. ("Applicant"), to prepare an Environmental Impact Report ("EIR") for the Project due to its foreseeable significant environmental impacts which will impact my family's and my community's health and well-being. I am dismayed that the County, having determined in 2015 that the Project requires an EIR, now proposes to fast-track environmental review of the Project through an unsupported and inapplicable exemption to limit public participation contrary to CEQA's requirements.

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, David C Deaton IV

Print Name, David C Deaton IV Address, 945 Hawaii Pl, Escondido, CA 92026

Date: 10-22-19

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, Joanne Deaton

Print Name, Joanne Deaton Address, 945 Hawaii Pl., Escondido, CA 92026

Date: 10-22-19

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed, Mary Donovan

Print Name, Mary Donovan Address, 1809 Carter Ave

Escondido Ca
92026

Date: 10/12/19

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed [Signature] Diane F. Dow

Print Name, Robert Dow Diane F. Dow Address 2201 Sawgrass Glen
Escondido, CA 92026

Additional project concerns:

Considering the 300+ Home approved to be built on the
Old Esccondido Country Club Site - Esccondido - W Country Club Lane
to the south
+ there New Construction to the north - Woodland Heights Glen

This is NOT a location for - crushing concrete! etc -

I Don't know if I'll be able to see it, but I know I do NOT
want to HAVE it, or be subject to additional FIRE hazard.

RBH

Date: 10/14/19

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed, Anita M. Downs

Print Name, ANITA M. DOWNS Address, 28024 HIGH VISTA DR, ESCONDIDO, CA 92026

Date:

10/10/19.

5

David Sibbet, Planning Manager

via mail and email to David.Sibbet@sdcounty.ca.gov

County of San Diego - Planning and Development Services

5510 Overland Avenue, Suite 310

San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed,



Print Name,

ALISON DRIESSEN

Address,

1757 Turnberry Dr
San Marcos CA 92069

Date: 8/14/19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed, Jack J. DuninPrint Name, JACK DUNINAddress, 2114 ROYAL LYTHAM BLVD
1780

Date: 10-18-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed, Dariusz Ekiadi

Print Name, DARIUSH EKIADI Address, 2219 Sawgrass Glen
Escondido, CA 92026

Date: 10/9/19

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed,

Print Name,

Barbara D. Erlos Address, 3823 Exception R. Rd

Date: 10/10/19

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

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Signed, Elizabeth H. Erickson

Print Name, Elizabeth H. Erickson Address, 2766 Quail Rd, Escondido, Ca
92026

Date: 10/12/19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

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- A facility to be perched on high level grade in view of over 6100 residents.

I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, 

Print Name, SHANNON FURNER Address, 1741 CYPRESS POINT Glen
ESCONDIDO, CA 92026

Date:

10/19/19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

I live an area that will suffer significant impacts from the proposed North County Environmental Resources project (Project). I submit this public comment letter concerning the proposed section 15183 exemption ("Proposed Exemption") as the County of San Diego ("County") should require the applicant, Hilltop Group Inc. ("Applicant"), to prepare an Environmental Impact Report ("EIR") for the Project due to its foreseeable significant environmental impacts which will impact my family's and my community's health and well-being. I am dismayed that the County, having determined in 2015 that the Project requires an EIR, now proposes to fast-track environmental review of the Project through an unsupported and inapplicable exemption to limit public participation contrary to CEQA's requirements.

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed,

Geraldine Geis

Print Name,

Geraldine Geis

Address,

2195 Torrey Glen

23 October 2019

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw.

Clara Gill

25110 Rue De Fleur
Escondido, CA 92026

23 October 2019

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

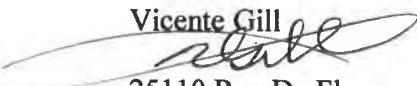
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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw.

Vicente Gill

25110 Rue De Fleur
Escondido, CA 92026

Date: 10-18-19

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, JoAnn Gilliland

Print Name, JoAnn Gilliland Address, _____

Date: 10/21/19

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, Carolyn May Glenn

Print Name, CAROLYN MAY GLENN Address, 1896 A Fairway Park Escondido 92026

Date: 10-15-19

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, Gayle Groh

Print Name, Gayle Groh

Address, 1729 Muirfield Glen, Esc.

Date: 10-5-2019

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

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Signed, 

Print Name, GERALD T. GRANGER

Address, 9766 CRYSTAL RIDGE DRIVE
ESCONDIDO CA 92026

Additional project concerns:

THE DRIVE BETWEEN ESCONDIDO AND
TEMECULA IS A WELCOME BREAK FROM CITY
AND INDUSTRIAL SURROUNDINGS. THIS VERY UGLY
FACILITY WOULD SEVERELY DISRUPT. BAD IDEA.
PUT IT IN THE CITY. WHERE IT BELONGS,

Date: 10-5-2019

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed,

Print Name,

Jody J. Granger

Jody J. Granger

Address,

9766 Crystal Ridge D
Escondido, CA 92026

Date: 10-19-2019

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, Barbara J. Gustafson

Print Name, Barbara J. Gustafson Address, 1747 Cypress St. Alen
Escobedo

Date: Oct 19, 2019

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, 

Print Name, Gordon Gustafson

Address, 1747 Cypress Point Glen

Escondido, CA 92026

Date: 10/12/19

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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- A facility to be perched on high level grade in view of over 6100 residents.

I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, Sandra Hamilton

Print Name, Sandra Hamilton Address, 1703 Doral Glen
Escondido, CA 92026

Additional project concerns:

NA

Date: 10-19-19

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

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Signed, Joy Harlow

Print Name, Joy Harlow

Address, 2219 Modina Glen
Escondido, CA 92026

Date: 10/20/19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, Print Name, Nancy HauserAddress, 668 Elizabeth St San Marcos
CA 92069

Date: 10-27-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, 

Print Name, Atila Hevesi Address, 25157 Sesmond Avenue
Escondido CA 92026

Date: Oct 19 19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, Hildegard M. Tolvstad

Print Name, HILDEGARD M. TOLVSTAD Address, 2938 HILTON HEAD

19-26-19
David Sibbet, Planning Manager

County of San Diego - Planning and Development Services

5510 Overland Avenue, Suite 310
San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-013, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

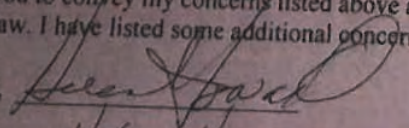
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Signed, 

Print Name, Helen Howard

Address, 25159 Jesmond Road

Escondido, CA 92026

Sibbet, David

From: helenhoward@cox.net
Sent: Saturday, October 26, 2019 3:12 PM
To: Sibbet, David
Subject: North County environmental resources, site plan review
Attachments: 20191026_150650.jpg

Sent from my LG Phoenix 4, an AT&T 4G LTE smartphone

CAUTION: This email originated from outside of the County network. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you are unsure, forward the email to spam.protection@sdcounty.ca.gov.

*Please distribute to Planning Commission*Date: 10-10-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

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Signed, Patricia A. Hunter

Print Name, PATRICIA A. HUNTER Address, 1240 PORTOLA AVE
ESCONDIDO 92026

Page 2.

In addition to the above, I want to stress I can understand why a business wants to locate their construction recycling plant in this location as there are huge plans to build in the old Escondido Country Club (380 units) where I live, plus the probable 2100+ unit development at Deer Springs – not to mention the building toward Fallbrook, etc.

BUT....why should a for-profit business have priority to skip past CEQA's full EIR? Why should this facility be built in a semi-rural area? There must be other sites that would not have the huge negative impacts on neighboring residents.

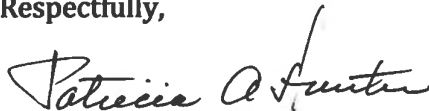
It seems to me the duty of the County is to protect it's citizens and the environment – not fast track a business enterprise that only has negative impacts on the people living within the area that it will affect.

Construction debris is part of the cost of building – so build this somewhere else that won't negatively affect every nearby resident as well as all the people who must drive Centre City Parkway, Deer Springs Rd., Mountain Meadow Road, etc.

Lastly, it is my understanding no ridgeline construction is allowed in Escondido – why doesn't the County respect this? If the County allows this business to be at such an elevation that it will be observable to residential communities where over 6000 people live, it will negatively impact property values along with quality of life.

PLEASE DO NOT APPROVE THIS PROJECT UNTIL A FULL EIR IS IN HAND AND ALL IMPACTS ARE RECOGNIZED.

Respectfully,



Patricia A. Hunter
1240 Portola Ave.,
Escondido, CA 92026

oilpainter.pat@gmail.com

Date: 10-18-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed, Susan Kaiser

Print Name, Susan Kaiser Address, 2213 Sawgrass Glen
Escondido, CA 92021

Date: 10/12/19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed, 

Print Name, Glenn Kalscheuer Address, 1703 Dorad Glen
Escondido, CA 92026

Additional project concerns:

n/A

Date: 10-27-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed, Edith Kovari

Print Name, Edith Kovari Address, 25157 Jesmond Lane rd
Escondido CA 92026

Date: 10/27/19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, 

Print Name, Edmond Kovesi Address, 25157 Jesmond Lane Rd.
Escondido CA 92026

Date: 10-27-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

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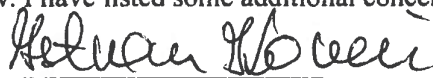
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Print Name, Estvan Kovacs Address, 25157 Desmond Lane rd
Escondido CA 92026

Date: 10-27-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed, Print Name, Kris KovesiAddress, 28157 Sesmond dene rdEscondido CA 92026

Sibbet, David

From: mai le <vofamily2005@hotmail.com>
Sent: Sunday, October 27, 2019 10:02 PM
To: Sibbet, David
Subject: Fw: Letter to David Sibbert
Attachments: Letter_from_MTL_to_David_Sibbert--27Oct2019.pdf

From: Toan Vo <ipluatsu2006@gmail.com>
Sent: Sunday, October 27, 2019 11:01 PM
To: mai le <vofamily2005@hotmail.com>
Subject: Letter to David Sibbert

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Date: 10/27/19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed, 

Print Name, MAI T. LE Address, 117 Double Eagle Glen
Escondido, CA 92026

Date: _____

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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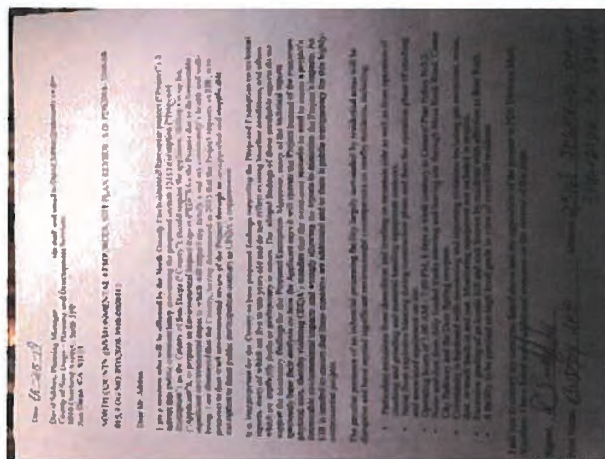
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Signed, Print Name, VERONICA T. LEAGUEAddress, 678 CALLE MONTERA
ESCONDIDO, CA
92025

Sibbet, David

From: Buddy Lee <rescuelee1@yahoo.com>
Sent: Monday, October 28, 2019 5:26 AM
To: Sibbet, David
Subject: Site plan review

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Sent from my iPhone

Sibbet, David

From: Angela Lee <Angela.Lee@unionbank.com>
Sent: Friday, October 25, 2019 11:39 AM
To: Sibbet, David
Subject: FW: Scan from Oasis Printer
Attachments: Scan2019-10-25-111203.pdf

Please see the attached document related to the North County Environmental Resources, Site Plan Review, S.O.:
PDS2008-3500-08-015, Log No. PDS2008-3910-0808012

Thank you.

Respectfully,

Angela Lee
Vice President
Branch Service Manager
Encinitas

Direct 760-753-5519 | Fax 753-5517
Union Bank | 200 West D Street
MC 02-021 | Encinitas, CA 92024
NMLS #683644
angela.lee@unionbank.com | unionbank.com



Please consider the impact on the environment before printing this document.

From: Angela Lee
Sent: Friday, October 25, 2019 11:12 AM
To: Angela Lee <Angela.Lee@unionbank.com>; Angela Lee <Angela.Lee@unionbank.com>
Subject: Scan from Oasis Printer

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Date: 10/25/2019

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, 

Print Name, ANGELA LEE

Address, 25169 JERMOND DENE RD
ESCONDIDO CA 92026

Date: 10/19/19

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

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Signed, Patricia Leopold

Print Name, PATRICIA LEOPOLD Address, 2205 HILTON HEB GLAD

Sibbet, David

From: mandelco@cox.net mandelco@cox.net <mandelco@cox.net>
Sent: Tuesday, October 08, 2019 9:10 AM
To: Sibbet, David
Subject: North County Environmental
Attachments: letter to county recycling.pdf

Please see attached.

Thank you. Please stop this from being done.
Karen Mandel

Date:

10/7/19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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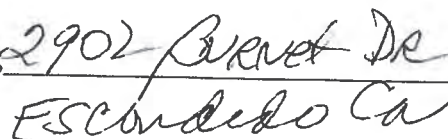
Signed



Print Name,

KAREN MANDEL

Address,



Date: 10/28/2019

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed, Christine Marler

Page 1

Print Name, CHRISTINE MARLER Address, 25147 Rueda Fleu, Escondido
CA 92026

Date: 10-23-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed,

Print Name,

Gina McCollough
Gina McCollough

Address,



Sibbet, David

From: Dennis & Rita <dmcfayden@cox.net>
Sent: Tuesday, October 29, 2019 12:56 PM
To: Sibbet, David
Subject: Site Plan Review PDS2008-3500-08-015, Log NO. PDS2008-3910-0808012
Attachments: Dennis McFayden Site Plan Objection.jpg; Rita McFayden Site Plan Objection.jpg

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Date: 10/29/2019

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

I live in an area that will be significantly impacted by the proposed North County Environmental Resources (NCER) ("Project"). I submit this public comment letter concerning the proposed section 15183 exemption ("Proposed Exemption") as the County of San Diego ("County") should require the applicant, Hilltop Group Inc. ("Applicant"), to prepare an Environmental Impact Report ("EIR") for the Project due to its foreseeable significant environmental impacts which will impact my family's and my community's health and well-being. I am dismayed that the County, having determined in 2015 that the Project requires an EIR, now proposes to fast-track environmental review of the Project through an unsupported and inapplicable exemption to limit public participation contrary to CEQA's requirements.

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- A facility to be perched on high level grade in view of over 6100 residents.

I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, Dennis M. Fayden

Print Name, Dennis M. Fayden Address, 2954 Jesmond Denic Heights Rd.
Escondido, CA 92026

Date: 10/29/2019

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

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Signed, Dennis McFayden

Print Name, Dennis McFayden Address, 2954 Jesmond Dene Heights Rd.
Escondido, CA 92026

Date: 10-29-19

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

via mail and email to David.Sibbet@sdcountry.ca.gov

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Signed, Rita M'Fayden

Print Name, RITA M'FAYDEN Address, 2954 Jeannette Avenue
Heights Road
Escondido, Ca 92026

Date: 10-29-19

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
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Signed, Rita McFayden

Print Name, RITA M'FAYDEN Address, 2954 Jeannette Lane
Heights Road
Escondido, Ca 92026

Date: _____

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Signed, Gerald McInroePrint Name, GERALD MCINROE Address, 2210 HILTON HEAD CILENLESDANDIA, CA 92026

Date: 10/22/19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed, Print Name, JOHN F. MCUIEAddress, 1015 HAWAII PLACE
ESCONDIDO, CA
92026

Date: 10/22/2019

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 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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Signed, 

Print Name, SANDY MONEY

Address, 1015 HAWAII PLACE

ESCONDIDO, CA 92026

Date: 10/14/19

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Signed, Maryem MedinaPrint Name, Maryem Medina Address, 1753 Cypress Point Glen Escondido, Ca

Date: Oct 13, 2019

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
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Signed, Joy Meeker

Print Name, Joy Meeker Address, 3165 N. Broadway
Escondido, 92028

Date: 10/18/19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

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Signed, Laurie Meyer

Print Name, Laurie Meyer Address, 2124 Royal Lytham Glen
Escondido, CA 92026

Date: 10/12/19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, 

Print Name, SONJA NELSON Address, 1711 CYPRESS POINT GLEN
ESCONDIDO, CA 92026

Date: _____

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

I live an area that will suffer significant impacts from the proposed North County Environmental Resources project (Project). I submit this public comment letter concerning the proposed section 15183 exemption ("Proposed Exemption") as the County of San Diego ("County") should require the applicant, Hilltop Group Inc. ("Applicant"), to prepare an Environmental Impact Report ("EIR") for the Project due to its foreseeable significant environmental impacts which will impact my family's and my community's health and well-being. I am dismayed that the County, having determined in 2015 that the Project requires an EIR, now proposes to fast-track environmental review of the Project through an unsupported and inapplicable exemption to limit public participation contrary to CEQA's requirements.

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, _____

Print Name, _____

BJARNE NICOLAISEN

Address, _____

333 CYPRESS, ESC 92025

Date: 10/10/19

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, Janice Niles

Print Name, Janice Niles Address, 1976 Miller Ave, Esc, CA 92025

Date: 10-10-2019.

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, Print Name, CAROL NORLAND Address, 2231 SAWGRASS GLEN

TIM NORLAND


ESCONDIDO CA 92026

Date: 10-10-2019

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, John OberhauserPrint Name, JOHN OBERHAUSER Address, 1749 SAWGRASS GLEN

Date:

10/19/19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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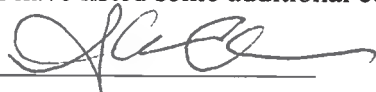
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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed,



Print Name,

Alexis Olson

Address,

2143 Royal Lytham Glen
 Escondido CA 92026

Date: 10-17-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, Brandi OrtizPrint Name, Brandi OrtizAddress, 1811 Congressional Gln,
ESC CA 92026

10/14/19
David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

3-1098

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, Diane Palmer

Print Name, DIANE PALMER Address, 1705 CYPRESS POINT GLEN
ESCONDIDO, CA 92026

Date: 10/24/19

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, 

Print Name, R. N. Pappas

Address, 2963 RUE MONTREUIL

Date: 10-19-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, Joan PeacePrint Name, Joan Peace Address, 1312 Gary LaneEscondido, CA 92026

Date: 10-15-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, Cindi PetersonPrint Name, Cindi Peterson Address, 2223 Medina Glen, Escondido

I work at Golden Door 777 Deer Springs Rd. San Marcos

Sibbet, David

From: Ray Plevyak <rayplevyak@att.net>
Sent: Sunday, October 27, 2019 2:49 PM
To: Sibbet, David
Subject: Proposed NCER Recycling Plant north Escondido
Attachments: 10-28-19 letter opposing NCER recycling plant.pdf

Dear Mr. Sibbet:

Attached is a letter objecting to the proposed NCER Recycling facility off of Mesa Rock Road.

I would have mailed you a copy but I just received the notice of a 10/28/19 4:00PM deadline from a concerned citizen in the area. I must have completely missed the general notifications to affected residents that normally precede voting on a project as disruptive to the local communities as this one.

Please reconsider and not allow this project to proceed. An industrial site as dusty, noisy and polluting as the proposed site does not belong in and around the quiet country neighborhoods that have been allowed to grow in this unincorporated area of San Diego county over the last 30 years.

Sincerely, Raymond S. & Karen E. plevyak

CAUTION: This email originated from outside of the County network. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you are unsure, forward the email to spam.protection@sdcounty.ca.gov.

Date: October 28, 2019

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

via email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

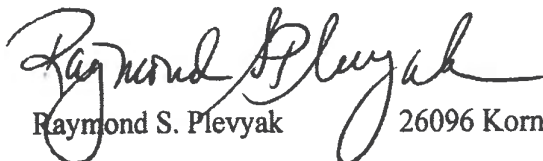
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It is inappropriate for the County to base findings supporting the Proposed Exemption on technical reports that may be five to ten years old and do not reflect existing baseline conditions, and others which are explicitly drafts or preliminary in nature. This area has changed significantly in the last five to ten years disqualifying any reports that old. In addition, many of the technical reports speciously base their analysis on how the Applicant says it will operate the Project instead of the maximum physical uses. This violates CEQA's mandate that the worst-case scenario be used to assess a project's foreseeable environmental impacts and wrongly allows the reports to minimize the Project's potential negative impacts. An EIR is needed to ensure that these concerns are addressed, as well as, there is public transparency for this highly-controversial project.

The peculiar presence of an industrial processing facility largely surrounded by residential areas will be disruptive and have myriad significant environmental consequences on nearby residents, including:

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- Operating hours of 5:00 AM - 7:00 PM, 6 days a week contrary to General Plan Policy N-5.2.
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- Excessive grading of an iconic hill and rock known by residents with affection as Bear Rock.
- A facility to be perched on high level grade in view of over 6100 residents.

I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.



Raymond S. Plevyak

26096 Kornblum Dr., Escondido, CA 92026

Additional project concerns:

Our house is on the east side of Interstate 15 with a direct view to the proposed site. Not only will we be subject to the eyesore of a recycling plant in a mostly residential area but because of prevailing winds we will most certainly be subject to operational noise from 5AM to 7PM six days a week, traffic noise from dump trucks starting even earlier and ending later, and dust and pollution from the recycling operations.

This will not only have a significant impact on the value of all our properties within the general area of the plant but, much more importantly, it will also have a significant negative impact on our current way of life.

We moved to this beautiful country setting 25 years ago because of the beauty of the hillsides and the peace and quiet. With this plant, the peace and quiet will definitely be taken away (at least 14 hours per day 6 days per week) as well as the beauty of the undisturbed hillside west of Interstate 15.

Date: 10/22/19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

I live in an area that will suffer significant impacts from the proposed North County Environmental Resources project (Project). I submit this public comment letter concerning the proposed section 15183 exemption ("Proposed Exemption") as the County of San Diego ("County") should require the applicant, Hilltop Group Inc. ("Applicant"), to prepare an Environmental Impact Report ("EIR") for the Project due to its foreseeable significant environmental impacts which will impact my family's and my community's health and well-being. I am ^{very} dismayed that the County, having determined in 2015 that the Project requires an EIR, now proposes to fast-track environmental review of the Project through an unsupported and inapplicable exemption to limit public participation contrary to CEQA's requirements.

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed,

Print Name,

Doreen Poling

Address,

2207 Sawgrass
Glen, Escondido
Ca. 92026

Additional project concerns:

Please reconsider the placement of a facility that could damage our precious hills w/ fire danger & pollution.

Date:

10/25/13
 David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed,

Print Name,

Patrick Poling
 Address, *2207 Sawgrass Glen*
Escondido CA
92026

Date: 10-26-2019

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, JAMES P. POWELL

Print Name, JAMES P. POWELL Address, 2356 N IRIS LN
ESCONDIDO, CA 92026

Date: 10/26/2019

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, Karen K Power

Print Name, Karen K Power

Address, 2356 N. Iris Ln.

Escondido, CA 92026

Sibbet, David

From: robinsmile@aol.com
Sent: Sunday, October 06, 2019 3:12 PM
To: Sibbet, David
Subject: Against the NCER Project

October 5, 2019

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015,
LOG NO. PDS2008-3910-0808012

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Thank you

Robin Rabens

28382 Tricia PL

Escondido, CA

92026

robinsmile@aol.com

Date: 10/20/19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, 

Print Name, MILU RATERMANN Address, 128 CHESAPEAKE CT SAN MARCOS
92069

Date: 10/14/19

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-
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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, 

Print Name, CATALIN RATIU Address, 1815 CONGRESSIONAL GLEN,
ESCONDIDO, CA.

Date: Oct 11/2019

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, Canace Reich

Print Name, CANACE REICH Address, 1741 Mainfield Way
Escondido Ca 92025

Date: 10/21/19

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

I am a resident who will be affected by the North County Environmental Resources project ("Project"). I submit this public comment letter concerning the proposed section 15183 exemption ("Proposed Exemption") as the County of San Diego ("County") should require the applicant, Hilltop Group Inc. ("Applicant"), to prepare an Environmental Impact Report ("EIR") for the Project due to its foreseeable significant environmental impacts which will impact my family's and my community's health and well-being. I am dismayed that the County, having determined in 2015 that the Project requires an EIR, now proposes to fast-track environmental review of the Project through an unsupported and inapplicable exemption to limit public participation contrary to CEQA's requirements.

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, 

Print Name, RUSSELL ROBINSON Address, 25671 RUE DE LA ESPERANZA, CA 92026

Date: 10/8/19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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- Excessive grading of an iconic hill and rock known by residents with affection as Bear Rock. ☹️
- A facility to be perched on high level grade in view of over 6100 residents. ☹️

I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, Print Name, Tanya RossAddress, 1383 Athens Place
Escondido, CA 92026

Additional project concerns:

Loss of wildlife habitat

Air quality concerns and other health hazards

Date: 10-14-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

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Signed, Sarah M. Sandvik

Print Name, SARAH M. SANDVIK Address, 1717 Muirfield Glen
Escondido, Ca. 92026
760 520-4727

3-1119

Date: 10-31-2019

David Sibbet, Planning Manager

County of San Diego - Planning and Development Services

5510 Overland Avenue, Suite 310

San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015. LOG NO. PDS2008-3910-0808012

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Signed, Betty Savinda

Print Name, Betty Savinda Address, 25297 Jesmond Dene Hills Pl
Escondido, CA 92026

Date: 10-30-18

David Sibbet, Planning Manager

via mail and email to David.Sibbet@sdcounty.ca.gov

County of San Diego - Planning and Development Services

5510 Overland Avenue, Suite 310

San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, Richard SavindraPrint Name, RICHARD SAVINDAAddress, 25297 JESMOND PINE
HTS, PL. ESCON, 92026

Date: 10/23/2014

3-1121

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, Andrea V. Saxe

Print Name, Andrea V. Saxe Address, 1937 Alexander Dr, Escondido
CA 92025-6404

Date: 10/25/14

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

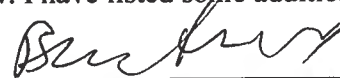
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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, 

Print Name, Bruce Senior Address, 2211 Medding GARDEN
Escondido CA 92026

Date: October 23, 2019

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page. →

Signed, Mary Ann Senior

Print Name, Mary Ann Senior

Address, 2211 Medina Glen
Escondido CA
92026

I am particularly concerned that this is being considered with out an EIR that takes into consideration maximum permitted use. It is inappropriate to put a facility that can be expected to generate so much noise, dust, traffic from trucks and increased fire danger in an area with so many existing homes and many more under construction. I would like to see the zoning changed back to residential!

M.A. Lem

Date: 10/25/19

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, Harvey Shepherd

2352 Lochridge Pl.

Print Name, Harvey Shepherd Address, Escondido, CA 92026

Sibbet, David

From: Madeleine <macduf3@cox.net>
Sent: Monday, October 28, 2019 2:42 PM
To: Sibbet, David
Subject: Concrete Crushing N. Escondido
Attachments: Scan0221.pdf

Dear Mr Sibbet

Please find attached my letter against the crushing plant in North Escondido. This is not a wise choice and not the right place for such a facility.

Yours Sincerely

Madeleine Smith

CAUTION: This email originated from outside of the County network. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you are unsure, forward the email to spam.protection@sdcounty.ca.gov.

Date: 10/28/2019

David Sibbet, Planning Manager

via mail and email to David.Sibbet@sdcounty.ca.gov

County of San Diego - Planning and Development Services

5510 Overland Avenue, Suite 310

San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, MSwift

Print Name, Madeleine Swift Address, 1655 Tierra Libertaria rd
Escondido CA 92026

Date: _____

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

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Signed, _____

Print Name, _____

Address, _____

Cynthia Snow
 Cynthia Snow

25618 Rue de la C
Escondido, CA
92026

Date: 10/20/19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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Signed, Print Name, Vicki SnyderAddress, 1529 Casa Real Ln
San Marcos, CA 92176

Date: 10-25-19

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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I live an area that will suffer significant impacts from the proposed North County Environmental Resources project (Project). I submit this public comment letter concerning the proposed section 15183 exemption ("Proposed Exemption") as the County of San Diego ("County") should require the applicant, Hilltop Group Inc. ("Applicant"), to prepare an Environmental Impact Report ("EIR") for the Project due to its foreseeable significant environmental impacts which will impact my family's and my community's health and well-being. I am dismayed that the County, having determined in 2015 that the Project requires an EIR, now proposes to fast-track environmental review of the Project through an unsupported and inapplicable exemption to limit public participation contrary to CEQA's requirements.

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The peculiar presence of an industrial processing facility largely surrounded by residential areas will be disruptive and have myriad significant environmental consequences on nearby residents, including:

- Particulate emissions from demolition and leveling on mountain side as well as from operation of crushing and grinding and material handling equipment outdoors.
- Noise from explosive blasting during construction phase and then the operation phase of crushing and associated equipment on site.
- Operating hours of 5:00 AM - 7:00 PM, 6 days a week contrary to General Plan Policy N-5.2.
- Noise and dust from fully loaded trucks entering and leaving site through Mesa Rock Road, Center City Parkway and the Deer Spring overpass.
- Community is burdened with monitoring and reporting violations including gas emissions, noise, dust, or truck loads in and out. Monitoring equipment not included in project.
- Excessive grading of an iconic hill and rock known by residents with affection as Bear Rock.
- A facility to be perched on high level grade in view of over 6100 residents.

I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed,



Print Name,

T. Rudy G. Sommar Address, 2384 N. Iris Ln Esc. CA 92026

Date: 10-23-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

I expect the applicant to be required to submit a full Environmental Impact Report for this project as the County required in 2015. Planning and Development Service (PDS) is now using the California Environmental Quality Act Section 15183 process which is a less intensive evaluation for project impacts and does not require public input. Given the potential impact of the project on the surrounding area, I believe a full Environmental Impact Report is required.

Hilltop Group Inc. is seeking to construct a recycling plant that will process Construction and Demolition debris as well as tree trimmings and green waste at 25568 Mesa Rock Road. The peculiar presence of an industrial recycling facility near these residential areas will be disruptive and have a number of negative consequences for local residents. These will result in very specific negative effects to an area that was not intended in the spirit of the County Plan or the CEQA submitted. These include:

- Particulate emissions from demolition and leveling on mountain side as well as from operation of crushing and grinding and material handling equipment outdoors
- Noise from explosive blasting during construction phase and then the operation phase of crushing and associated equipment on site.
- Operating hours 5:00 AM till 7:00 PM, not meeting Policy N-5.2 of the General Plan
- Noise and dust from fully loaded trucks entering and leaving site through Mesa Rock Road, Center City Parkway and the Deer Spring overpass.
- Community is burdened with monitoring and reporting violations including gas emissions, noise, dust, or truck loads in and out. Monitoring equipment not included in project.
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I also believe that the hundreds of pages of information submitted by the applicant cannot be adequately reviewed by residents in the 30-day time period allowed by your department – the comment period is closing on October 14, 2019. I request that time period be extended 90 days from October 14, 2019.

Signed, Barbara Spector

Print Name, BARBARA SPECTOR Address, 2498 Bear Rock Glen
Escondido, CA 92026

Date: 10-24-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, Gay Sports

Print Name, Gay Sports

Address, 28490 Cervera Ct
ESCONDIDO, CA 92026

Date: 10-22-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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- A facility to be perched on high level grade in view of over 6100 residents.

I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. ~~I have listed some additional concerns on the reverse of this page.~~ (these are reason enough)

Signed, 10-22-19

Print Name, Michael Sumpter & Virginia Sumpter Address, 1713 Sawgrass Glen, Escondido, CA

Date:

10/24/19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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- A facility to be perched on high level grade in view of over 6100 residents.

I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, Ben Takagi

Print Name, Ben Takagi Address, 330 Cheyenne Ln 92028

Sibbet, David

From: mynameinlights <mynameinlights@gmail.com>
Sent: Monday, October 28, 2019 6:14 PM
To: Sibbet, David

Dear Mr. Sibbet:

I live in an area that will be significantly impacted by the proposed North County Environmental Resources (NCER) ("Project"). I submit this public comment letter concerning the proposed section 15183 exemption ("Proposed Exemption") as the County of San Diego ("County") should require the applicant, Hilltop Group Inc. ("Applicant"), to prepare an Environmental Impact Report ("EIR") for the Project due to its foreseeable significant environmental impacts which will impact my family's and my community's health and well-being. I am dismayed that the County, having determined in 2015 that the Project requires an EIR, now proposes to fast-track environmental review of the Project through an unsupported and inapplicable exemption to limit public participation contrary to CEQA's requirements. It is inappropriate for the County to base proposed findings supporting the Proposed Exemption on technical reports, many of which are five to ten years old and do not reflect existing baseline conditions, and others which are explicitly drafts or preliminary in nature. The alleged findings of these unreliable reports do not support the necessary findings for the Proposed Exemption. Moreover, many of the technical reports speciously base their analysis on how the Applicant says it will operate the Project instead of the maximum physical uses, thereby violating CEQA's mandate that the worst-case scenario be used to assess a project's foreseeable environmental impacts and wrongly allowing the reports to minimize the Project's impacts. An EIR is needed to ensure that these concerns are addressed and so there is public transparency for this highly-controversial project.

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw.

Signed,

The Springfield Family

25860 Holly Ave, Escondido CA 92026

Sent from my Sprint Samsung Galaxy S8.

CAUTION: This email originated from outside of the County network. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you are unsure, forward the email to spam.protection@sdcounty.ca.gov.

Date: 10-15-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, Penny Thompson

Print Name, Penny Thompson Address, 1759 Cypress Point Glen
Escondido, CA 92026

Date: 10-11-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, Mary Ann Truesdale

Print Name, Mary Ann Truesdale Address, 2237 Sawgrass Glen
Escondido, CA. 92026

10-11-19

The area surrounding this proposed plant is one of Escondido's loveliest with the hills and beautiful rocks. The Mama Bear and Cub rocks are a symbol of Escondido for so many people. Please do not allow a dirty, noisy, invasive plant to disturb the natural beauty and serenity of this area. Those are things easily destroyed and irreplaceable and are treasured by the people who live here.

May Ann Luczak
2237 Sanguass Ln
Escondido, CA. 92026

Sibbet, David

From: Niensan Tseng <niensan03@gmail.com>
Sent: Thursday, October 10, 2019 5:11 PM
To: Sibbet, David
Subject: NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008-3500-08-015, LOG NO. PDS2008-3910-0808012
Attachments: NORTH COUNTY ENVIRONMENTAL RESOURCES SITE PLAN REVIEW.pdf

Dear Mr. Sibbet:

I have included my concern on the project in the attached file. Please convey my concerns and my opposition of the project to PDS Director Mark Wardlaw. Thank you.

Regards,

Nien-San Tseng

Date: 10/10/2019

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, 

Print Name, NIEN-SAN TSENG Address, 1251 NUTMEG TER. ESCONDIDO, 920

Date: 10/26/19

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, 

Print Name, TANYA TURCK Address, 2381 N IRIS LN
ESCONDIDO, CA 92026

Date: 10.12.19

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

I am a resident who will be affected by the North County Environmental Resources project ("Project"). I submit this public comment letter concerning the proposed section 15183 exemption ("Proposed Exemption") as the County of San Diego ("County") should require the applicant, Hilltop Group Inc. ("Applicant"), to prepare an Environmental Impact Report ("EIR") for the Project due to its foreseeable significant environmental impacts which will impact my family's and my community's health and well-being. I am dismayed that the County, having determined in 2015 that the Project requires an EIR, now proposes to fast-track environmental review of the Project through an unsupported and inapplicable exemption to limit public participation contrary to CEQA's requirements.

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I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, Timothy J. Lutz

Print Name, PETER HESTER Address, 2963 OLD BLANCO CANYON PIKE

Date: 10-12-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

NORTH COUNTY ENVIRONMENTAL RESOURCES, SITE PLAN REVIEW, S.O: PDS2008- 3500-08-015, LOG NO. PDS2008-3910-0808012

Dear Mr. Sibbet:

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- A facility to be perched on high level grade in view of over 6100 residents.

I ask you to convey my concerns listed above and my opposition of the project to PDS Director Mark Wardlaw. I have listed some additional concerns on the reverse of this page.

Signed, Print Name, Jania WelshAddress, 2139 Weiss WayEscondido, CA 92026

Date: 10-12-19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

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Signed, Paul Heredia

Print Name, PAUL HEREDIA Address, 920 E. EL NORTE PKWY
ESCONDIDO CA, 92026

Date: 10-12-19

David Sibbet, Planning Manager
County of San Diego - Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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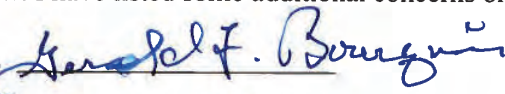
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Signed,



Print Name, Gerald F. Bourguin Address, 2296 Amber Lane Escondido CA 92026

Date: 16.12.19

David Sibbet, Planning Manager
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

via mail and email to David.Sibbet@sdcounty.ca.gov

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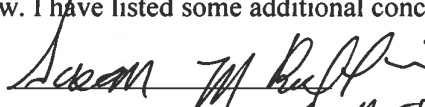
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Signed,



Print Name,

Susan M Ruffin Address, 2005 Skyview Glen
Escondido, CA
92027

Date: 10/2/19

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

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Signed, 

Print Name, CHRISTINA SANTANA Address, 2132 WOODGLEN PLACE ESCONDIDO CA 92

Date: 01/21/18

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
 County of San Diego - Planning and Development Services
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Signed, Helen Sandberg

Print Name, Helen Sandberg Address, 525 W. El Norte #317
Enc Ca 92026

Date: 10-12-19

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Signed, Carilyn Robert

Print Name, Carilyn Robert

Address, 14776 INTERLACHEN TERRACE

VALLEY CENTER, CA 92082

Date: 10/12/19

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Signed,

Print Name,

Barbara F. Gomes Address, 525 W. El Norte Pkwy #317
Es. Ca 92026

Date: 10-12-19

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Signed, Cathie White

Print Name, CATHIE White Address, 26745 N. Broadway

ESC CA 92626

Date: 10-12-19

David Sibbet, Planning Manager via mail and email to David.Sibbet@sdcounty.ca.gov
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Signed,

Print Name,

Shirley M. Karsa
SHIRLEY M. KARSA

Address,

3139 SANS SOUCI DR
ESCONDIDO, CA 92029