

## Sibbet, David

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**From:** Bill Martin <bmartin@escondido.org>  
**Sent:** Monday, October 14, 2019 2:33 PM  
**To:** Sibbet, David  
**Subject:** NCER Comments  
**Attachments:** doc02030520191014142058.pdf

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  
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**Bill Martin, AICP**  
**Director of Community Development**  
**Planning Division**  
**201 North Broadway, Escondido, CA 92025**  
**Phone: 760-839-4671 Fax: 760-839-4313**

October 14, 2019

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

RE: Notice of Intent - North County Environmental Resources PDS2008-3500-08-015  
Log No. PDS2008-3910-0808012

Dear Mr. Sibbet:

The City of Escondido appreciates this opportunity to comment on the proposed environmental findings for the project described above. The City has been monitoring the applicant's progress for several years and supports the County's efforts to provide a comprehensive review of this heavy industrial proposal in a semi-rural area near the northern boundary of Escondido.

The High Impact Industrial land use designation and associated M-54 zoning established on the site have long been a concern to the City and surrounding residents. Implementation of a concrete/asphalt/construction debris recycling facility will result in numerous physical impacts and could frustrate future County and City efforts to provide additional housing in the area.

The City of Escondido is directly adjacent to the western boundary of the ownership parcels and city residents live in close proximity to the southern boundary of the site. The project site is located within the Sphere of Influence and General Plan Boundary for the City of Escondido. The Escondido General Plan designates the project site as Rural I for low-density residential use with minimum lot sizes of 4, 8 and 20 acres. This designation is more consistent with the surrounding development pattern than the current High Impact Industrial designation imposed by the County at the request of the property owner.

County of San Diego PDS has determined the project is exempt from the California Environmental Quality Act (CEQA) under Public Resources Code Section 21083.3 and

CEQA Guidelines Section 15183 because the proposed project is consistent with the previously certified Environmental Impact Report (EIR) for the General Plan Update and there are no project-specific significant effects that have not been addressed as a significant effect in the prior EIR. This determination can be made only in situations where uniformly applied development policies or standards can be utilized as mitigation for significant effects.

The City of Escondido respectfully disagrees with the finding that the proposed project is consistent with the analysis performed for the General Plan Update (GPU) EIR and objects to the proposed CEQA exemption as noted in the following comments:

#### General

1. The 39-lot High Point (Escondido Tract 683-J) development located just west of the project site has a recorded final map. All streets have been completed and graded pads are ready for residential construction. The City is currently engaged in the design review process with a home builder. High Point is significantly higher than the project site and provides many direct line of sight opportunities into the proposed industrial project site. The High Point development is a reasonably anticipated off-site cumulative project and potentially significant effects from the proposed project have not been analyzed in the project environmental documentation nor the GPU EIR.

#### Aesthetics

The Visual Resources Impact Report (TRS, December 2014) notes the purpose of the Scenic Preservation Guidelines for the I-15 Corridor is to "1) Protect and enhance scenic resources within the I-15 Corridor Planning Area, while accommodating coordinated planned development which harmonizes with the natural environment."

1. The High Point development is located much higher and closer to the project site than the Jesmond Dene community. Although the graded pads for the High Point development are clearly visible in the Figures provided with the analysis, the report does not include High Point as a cumulatively affected "Viewer Group" and thus does not analyze potentially significant off-site cumulative impacts.

2. The report states that storage materials on the site will not be visible from I-15. The site plan indicates a five-foot setback for storage would be required from the inside of the loop road. According to the cross-section in figure 7, storage containers and materials piles at the 20-foot height limit would need to be set back at least 60 feet from the inside of the loop road to not be visible from I-15.

### Air Quality

San Diego County is currently in non-attainment status for Particulate Matter (PM 10 and PM 2.5). Operations on the site will generate significant amounts of this constituent, which can then impact off-site properties.

1. Crushing and grinding concrete, asphalt, trees and logs will result in fugitive dust emissions. The Air Quality and Greenhouse Gas Emissions Assessment memorandum (Dudek, June 2019) indicates a maximum of 20 tons of material per day would be crushed. This production rate is far less than the production capacity for the facility. Air Quality impacts analyzed at this reduced production rate are likewise underreported and additional mitigation may be required.
2. Dust emissions have proven to be a significant off-site issue for materials recycling facilities. A robust Dust Control Plan will be necessary and should have been evaluated as part of the air quality analysis.

### Biological Resources

1. The Biological Assessment notes the site has been illegally graded and a majority of biological impacts have already occurred without authorization. An additional 1:1 mitigation ratio is properly assessed as a penalty over and above standard ordinance compliance ratios. This additional mitigation is directly related to a project specific impact peculiar to the subject parcel and is outside the scope of the GPU EIR Biological Mitigation Measures Bio 1.5 and Bio 1.6.

### Noise

1. The Noise Technical Memorandum (Dudek) notes the project is limited to two export trips per day and operations will occur between 5 a.m. and 7 p.m. Monday-

Saturday. As noted elsewhere in our comments, the project scale and investment in the facility would suggest that overall production and traffic generation has been significantly underrepresented.

2. The memorandum notes the anticipated 64.7 dBA/CNEL noise level at the western property line would not meet County standards. Operations prior to 7:00 a.m. would be required to meet more restrictive nighttime noise standards. Cumulative noise impacts with respect to the future High Point neighborhood have not been analyzed and likely would exceed the City of Escondido standard of 45 dBA/CNEL for nighttime operations necessitating additional mitigation. At a minimum, pre-dawn noise from the facility would be a daily nuisance for future Escondido residents. The same issue would occur at the residences located 465 feet south of the site.

### Traffic

1. According to the Preliminary Traffic Assessment (RBF, May 2013), the project will generate approximately 6-8 in-bound daily truck trips and 2 out-bound daily truck trips. This trip generation rate appears to be significantly underestimated given the size and capacity of the facility.
2. The project will introduce heavy industrial traffic into a semi-rural area where no other industrial land uses occur. The traffic assessment states that trucks negotiating the existing westbound to northbound curve on Mesa Rock Road cannot safely do so under existing improvement conditions. Mitigation in the form of street widening through the curve will be required. This is a significant off-site impact peculiar to the proposed project that was not evaluated in the GPU EIR.

The City of Escondido remains concerned that the project will be a high impact industrial anomaly located within a relatively rural and scenic setting that will impact existing residents and could frustrate future attempts to develop critically needed housing in the area. The project analysis appears to be incomplete in that potential cumulative significant effects have not been completely analyzed. Additionally, production rates for the facility appear to be substantially underestimated leading the reader to conclude potentially significant effects are underreported and possibly unmitigated. The

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environmental document does not specify how this low production rate will be monitored to ensure project impacts are minimized to the extent documented in the analysis.

The proposal requires mitigation for significant effects peculiar to the site that are beyond standard ordinance compliance measures. Therefore, the CEQA exemption cannot be supported due to project specific impacts not anticipated in the previous GPU EIR. The City of Escondido would appreciate being informed of any further determinations, decisions and appeal periods for this project. Please send these notifications to my attention at [bmartin@escondido.org](mailto:bmartin@escondido.org).

Sincerely,



Bill Martin  
Director of Community Development

Copy: Mayor and City Council Members  
Jeffrey Epp, City Manager  
Kristin Gaspar, District 3 Supervisor  
Jim Desmond, District 5 Supervisor