

The logo for The True Life Companies, featuring the words "THE TRUE LIFE" in a serif font inside a red square, with the word "COMPANIES" written vertically in a sans-serif font to the right of the square.

COMPANIES

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 883-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.

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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 Flitton
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 Flitton, TTLC
Lloyd McKibbin, CWC