

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@sdcountry.ca.gov>; Gaspar, Kristin <Kristin.Gaspar@sdcountry.ca.gov>; Desmond, Jim <Jim.Desmond@sdcountry.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.

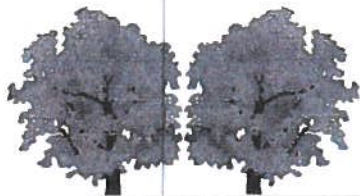
I would hope that you are not one of the dirty dozen profiting from this catastrophic event that will no doubt end in thousands of residents becoming ill and experiencing the variety of diseases that science has connected to toxic elements in air quality, water quality, and food quality, such as: Cancer, Autism, Alzheimer's, Parkinson's, ALS, Lou Gehrig's disease ... the list goes on.

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