

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Although with an outdated and "streamlined" environmental review performed 10 years ago that may have complied at a cursory level regarding density, zoning, and the general plan, it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 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 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 Sabotta

Print Name, Leigh Sabotta Address, 2963 Rue Montreux
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