

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 [JT1] 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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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.

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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.

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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.
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Sincerely,

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