

**CLERK OF THE BOARD OF SUPERVISORS
EXHIBIT/DOCUMENT LOG**

MEETING DATE & AGENDA NO. 07/17/2024 #11

STAFF DOCUMENTS (Numerical)

No.	Presented by:	Description:
1.	Staff	15-page PowerPoint Presentation
2.		
3.		
4.		

PUBLIC DOCUMENTS (Alphabetical)

No.	Presented by:	Description:
A.	Public	8-page document
B.	Public	3- page document
C.		
D.		
E.		
F.		
G.		

**OFFICIAL RECORD
Clerk of the Board of Supervisors
County of San Diego**

Exhibit No. 1

Meeting Date: 7/17/24 Agenda No. 11

Presented by: Staff



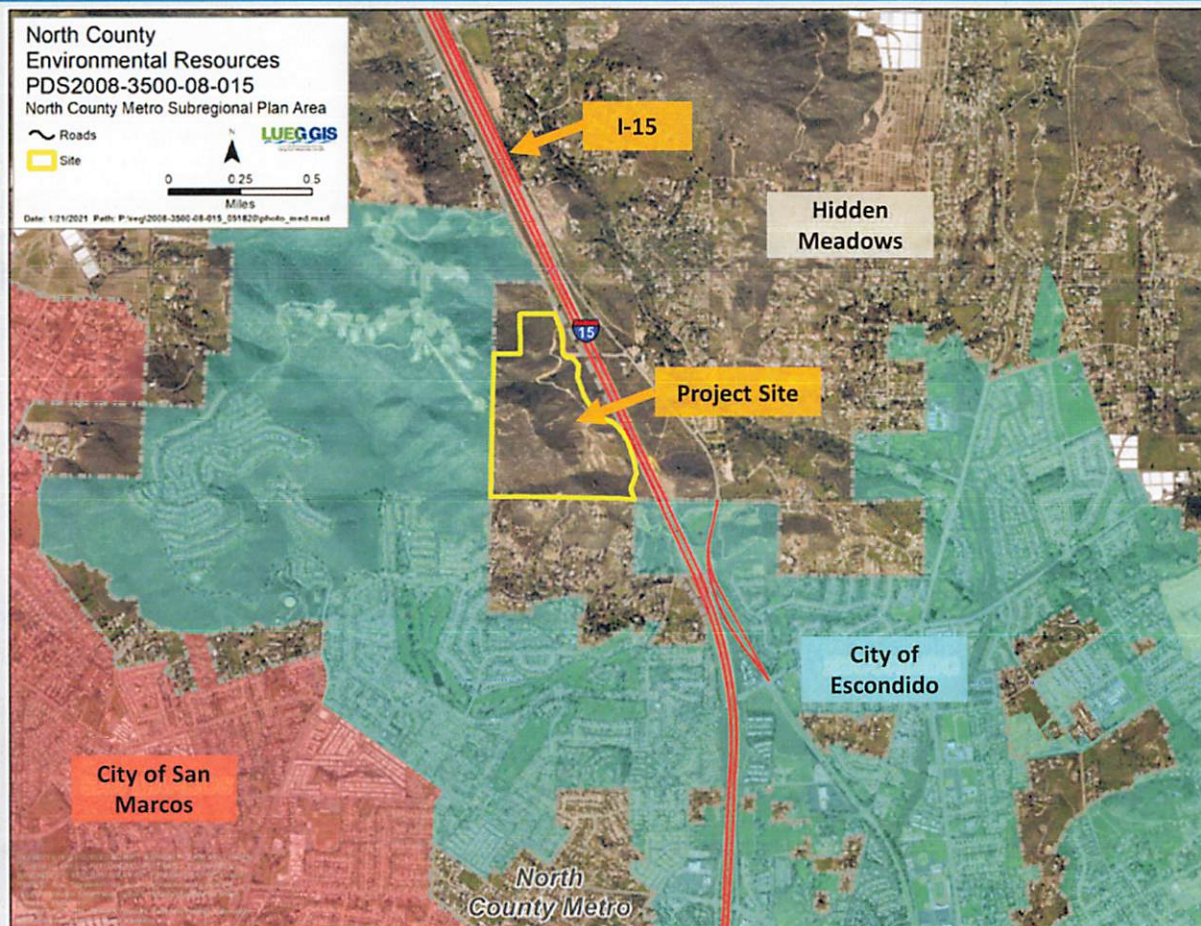
North County Environmental Resources

Board of Supervisors

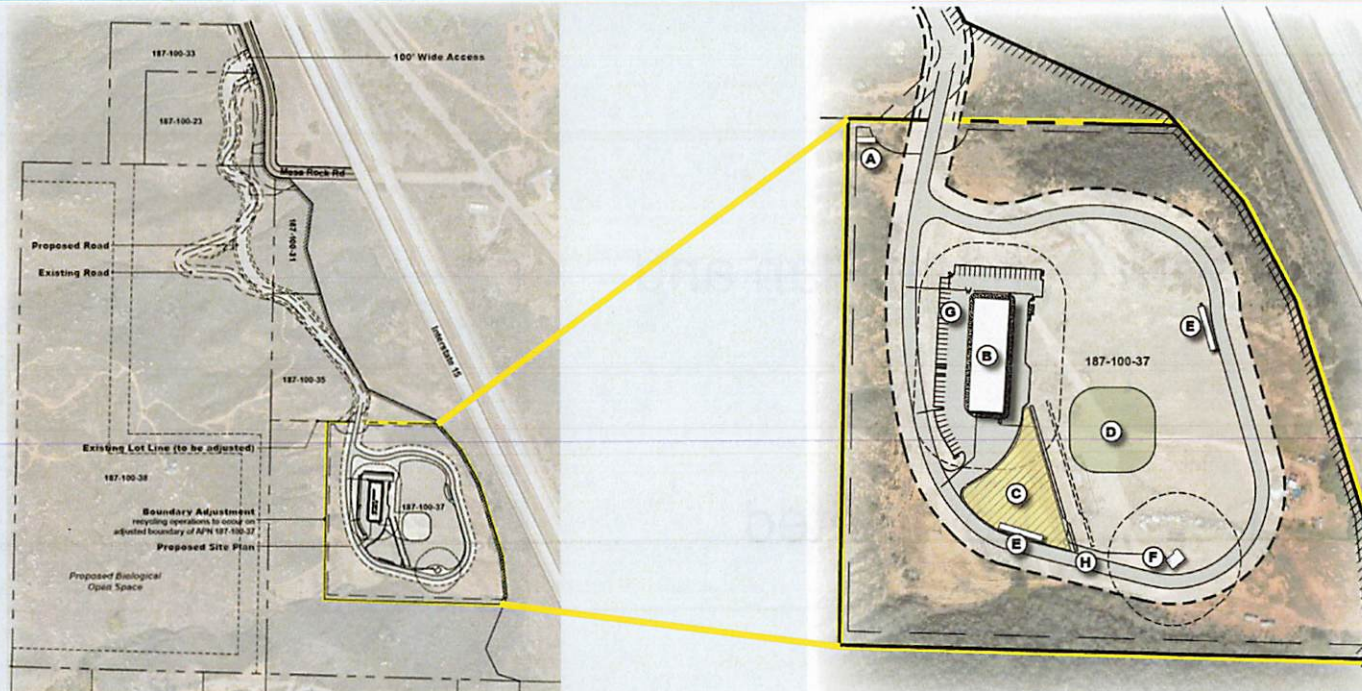
July 17, 2024

Item #11

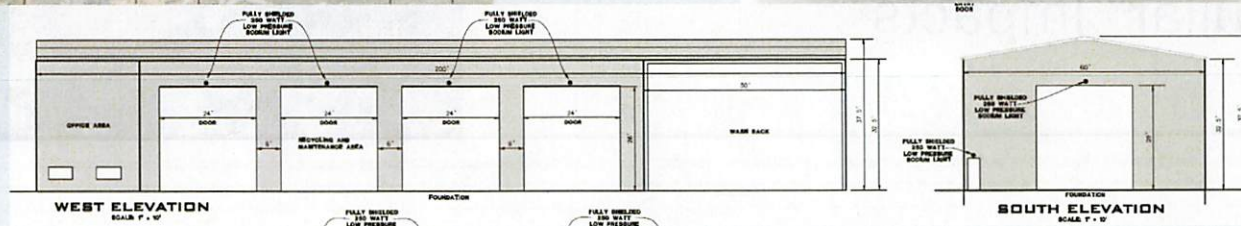
Vicinity Map



Project Description

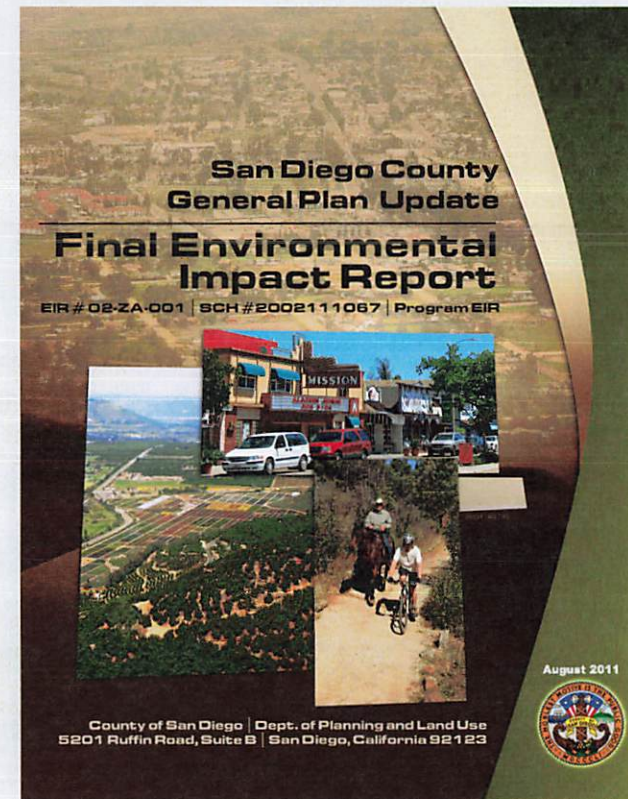


- Key Notes**
- (A) Water Tank
 - (B) Recycling Building
 - (C) Proposed Processing Area
 - (D) Previous Processing Area
 - (E) Truck Scale
 - (F) Security Trailer
 - (G) Parking
 - (H) Proposed Road



California Environmental Quality Act (CEQA)

- CEQA Section 15183
- Consistent with General Plan and Zoning
- Technical Reports Completed
- No “Peculiar” Impacts



Project History

- Zoning Administrator
 - June 25, 2020
 - 15183 CEQA Exemption
 - Four Appeals - Twin Oaks Valley Community Sponsor Group (CSG), Hidden Meadows CSG, City of Escondido, and Montreux Homeowners Association
- Planning Commission
 - February 5, 2021
 - Denied Four Appeals
 - 15183 CEQA Exemption
 - Four Appeals

Project History

- Board of Supervisors
 - May 5, 2021
 - Appeals Granted
 - 15183 CEQA Exemption Denied
 - Project Remanded to Prepare Environmental Impact Report (EIR)
- Lawsuits Filed by Applicant

Court Writ

June 10, 2024

- Set aside Board's May 5, 2021 Actions
- Issue Decision Denying Appeals
- Affirm February 5, 2021 Planning Commission Decisions
 - Approve the Project
 - Approve CEQA 15183 Exemption



North County Environmental Resources

Board of Supervisors

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Item #11

Views of the Site

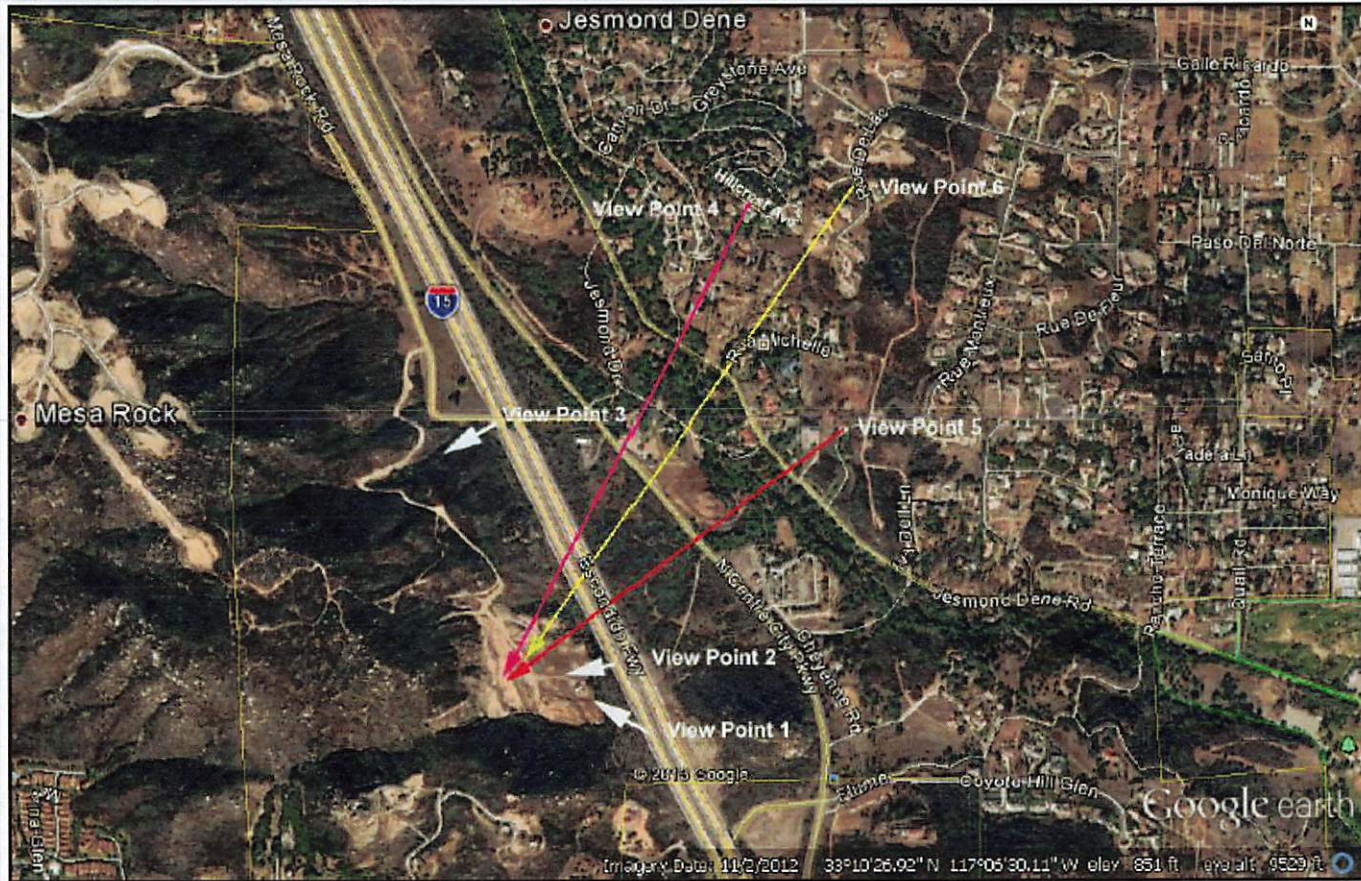


Photo Simulations

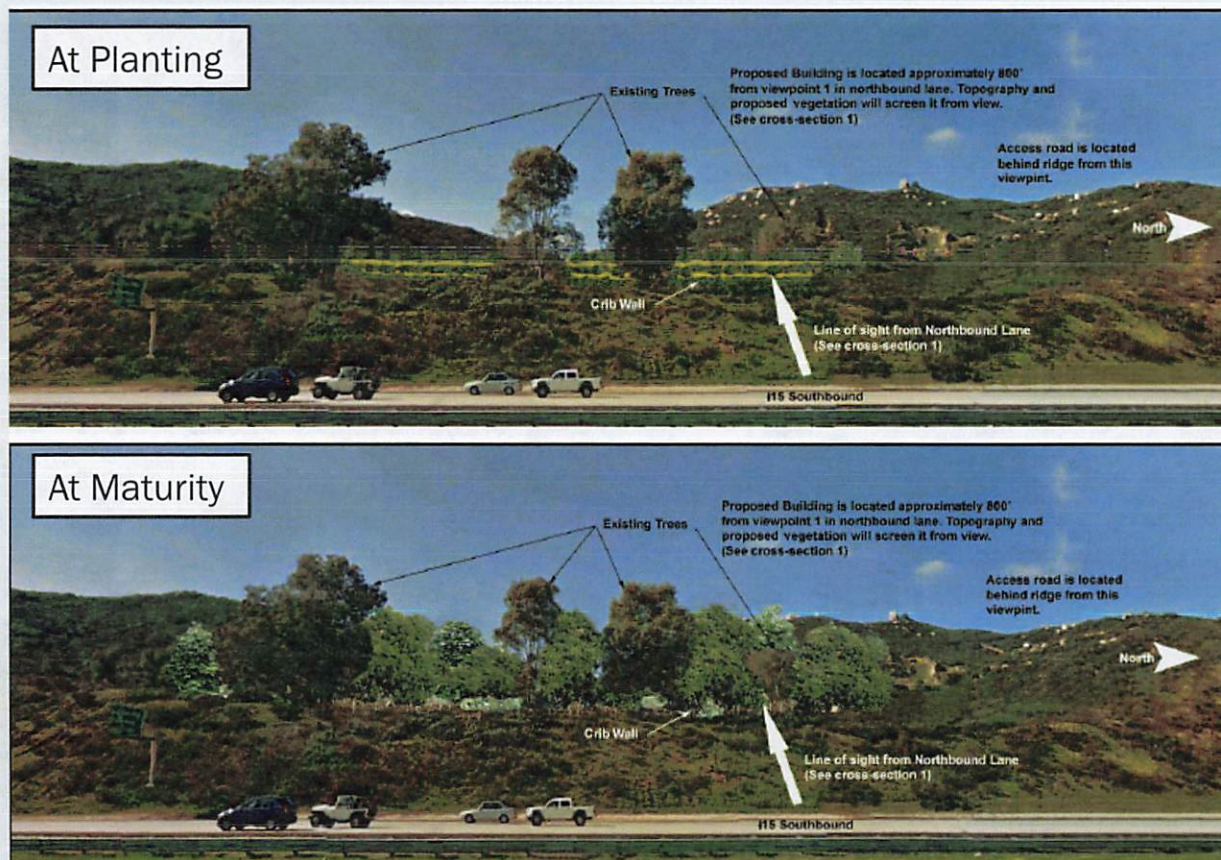


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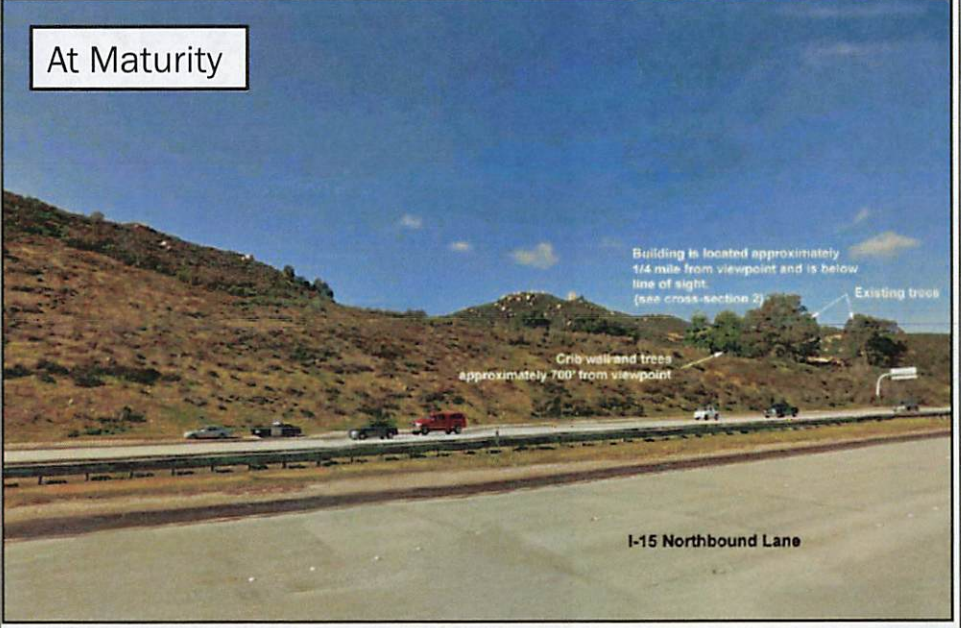
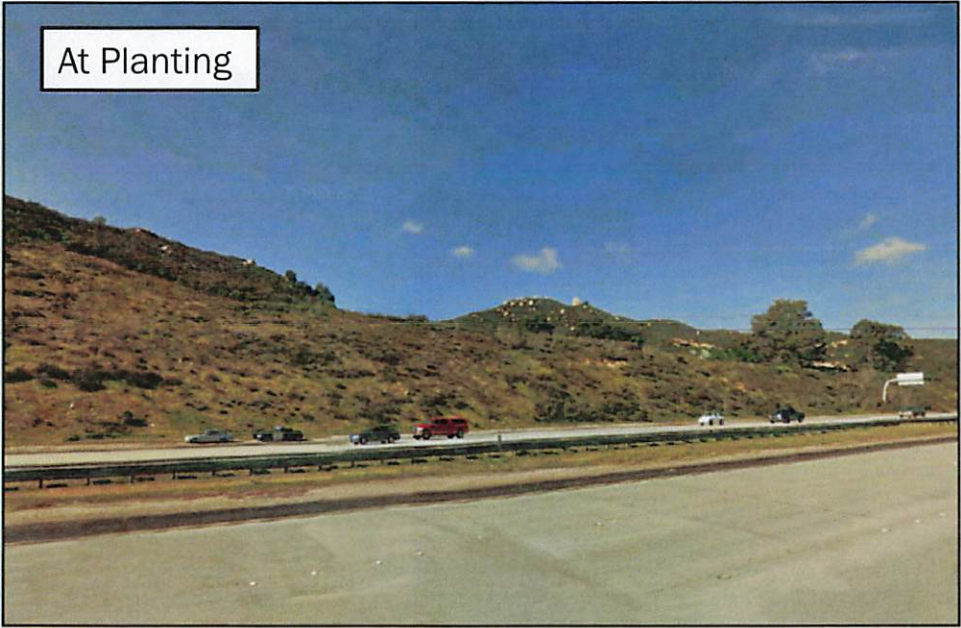


Photo Simulations



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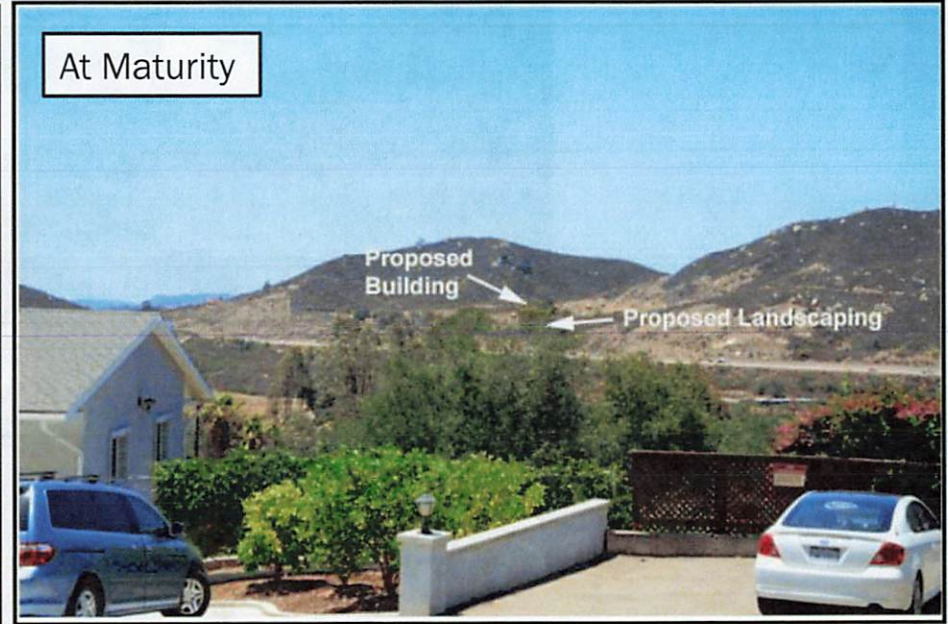
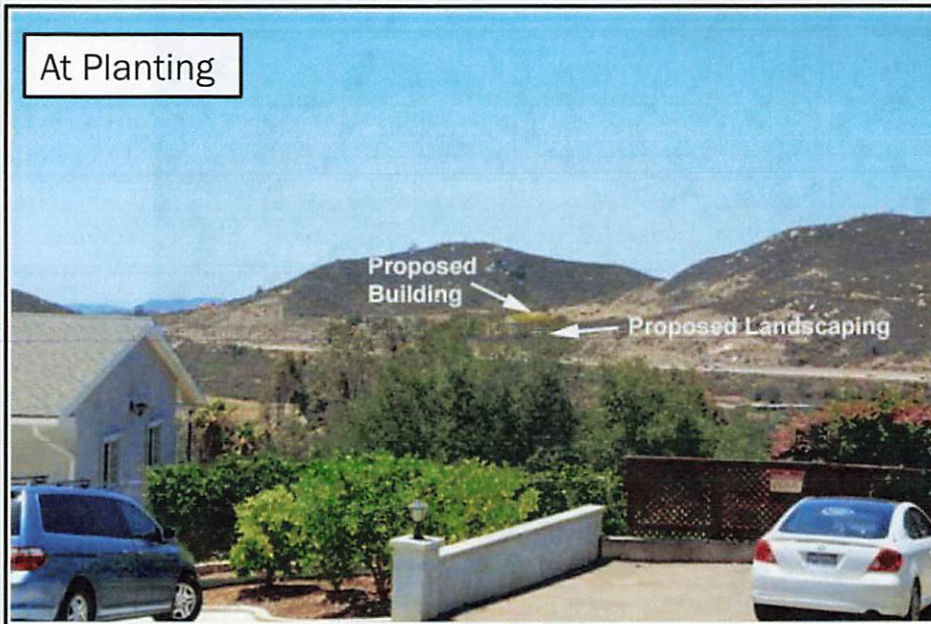


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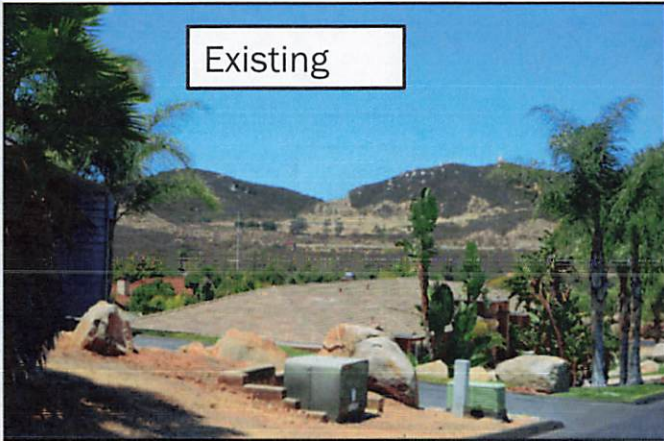
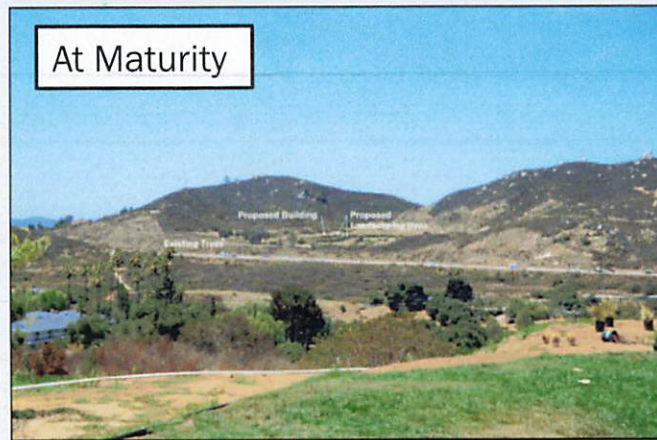
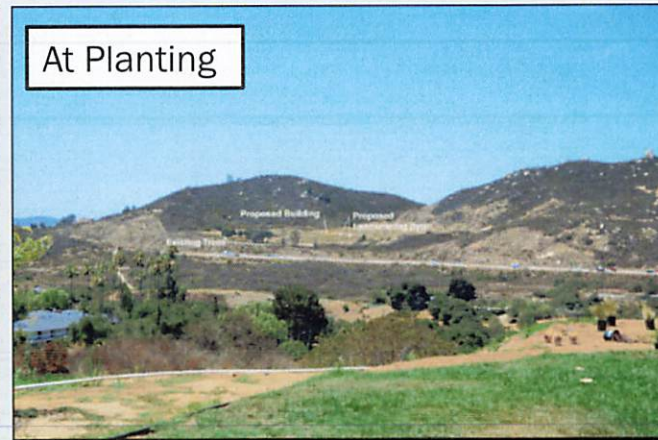


Photo Simulations



OFFICIAL RECORD
Clerk of the Board of Supervisors
County of San Diego

Exhibit No. A

Meeting Date: 7/17/24 Agenda No. 11

Presented by: PUBLIC

17 JULY 2024 ITEM #11

NCEA

Good Morning and I thank you for the opportunity to address you this morning. My name is Vicente Gill and I reside at 25110 Rue De Fleur, Escondido 92026. You, the San Diego County Board of Supervisors, have been of great help in the past with calling for a full Environmental Impact Report, to provide full disclosure of the effect of this project to the surrounding environment and residents.

My purpose for addressing you this morning is to highlight two concerns and solicit your help with the implementation of practical measures to mitigate negative effects of this project.

The photos presented here serves as a reminder that the North County Environmental Project will be nested in a location surrounded by a number of residential areas.

The photo on slide #2 was taken last Monday, and it reflects new construction within three tenths of a mile above and to the right or north of this project.

Concern

Per our county's Planning and Development Services (PDS):

- "The property owner is responsible for ensuring that dust suppression is done accordance with the conditions. If the county receives a report that the property owner is not operating in accordance with the conditions, the County will investigate and take action if necessary to bring the property into compliance".

The communities are further informed that - If the property owner does not self report non-compliance, the burden obviously falls on the community to report non-compliance. This is an unfair burden on the community members.

Request

- The project applicant be required to install and use electronic monitoring devices, with recording capability, to monitor for dust and noise, as a means of ensuring conformance to the established approved standards.

27 JULY 2024
NCEZ

ITEM # 11

Monitoring through the use of recording technology will help County authorities and surrounding communities establish non-compliance in cases where visual sighting of dust or excessive noise is abated by the time County authorities respond to a report of violation. This requirement will better protect the communities from these impacts and relieve them of the burden of being the monitors of such issues.

Note: Such technology is readily available and used in other parts of the USA, and should be installed at various points on the periphery of the site.

Concern

- The fire plan submitted by the applicant is a short-form format which, according to County guidelines, is designed for “minor projects that have little to no anticipated risk of loss, injury, death involving wildland fires”. It is for “projects with virtually no wildlands in the immediate vicinity.”

The applicant’s own fire plan says “Large quantities of native brush exist adjacent to the project site.” This creates an extreme fire hazard.

Request

- The Board of Supervisors should ask for an updated fire plan. A plan that addresses the
 - Requirements for “red flag” days.
 - Temperature monitoring of combustible piles of inventory.
 - Proper definition of a water system for fire hydrants.

I thank you for your attention and consideration of both requests.

North County Environmental Resources (NCER) Project

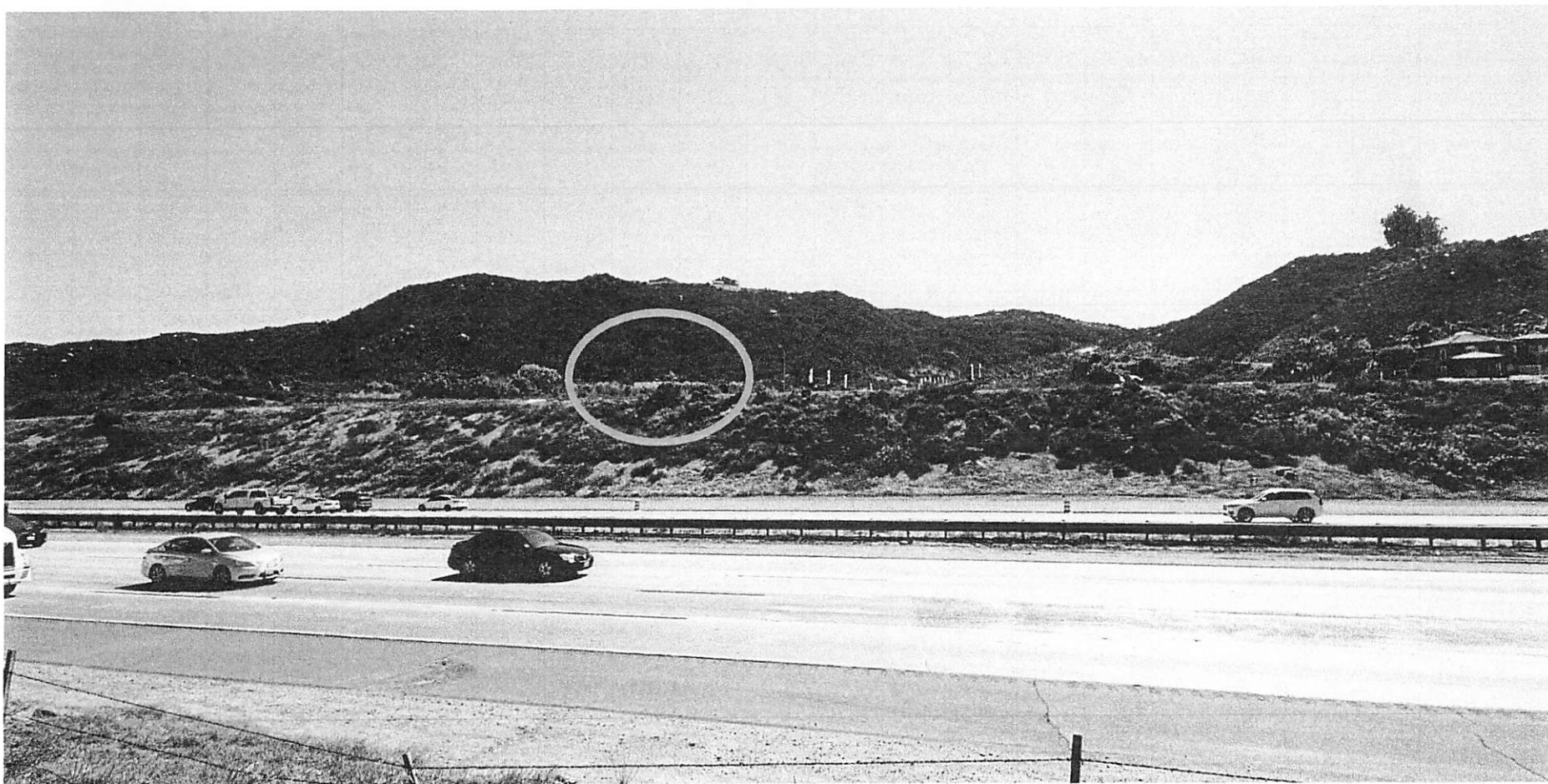


Imagery ©2019 Google, Imagery ©2019 Maxar Technologies, U.S. Geological Survey, 500 ft
USDA Farm Service Agency, Map data ©2019

NCER PROJECT - INADEQUATE FIRE PLAN



NCER PROJECT - INADEQUATE FIRE PLAN



NCER PROJECT – EXTREME FIRE DANGER AREA



NCER PROJECT – COMPLIANCE WITH APPROVALS

Concern

Per our county's Planning and Development Services (PDS):

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Request

- The project applicant be required to install and use electronic monitoring devices with recording capability to monitor for dust and noise as a means of ensuring conformance to established approved standards.

Note: Such technology is readily available and used in other parts of the USA, and should be installed at various points on the periphery of the site.

NCER PROJECT – INNADEQUATE FIRE PLAN

Concern

- The fire plan submitted by the applicant is a short-form format which, according to County guidelines, is designed for “minor projects that have little to no anticipated risk of loss, injury, death involving wildland fires”. It is for “projects with virtually no wildlands in the immediate vicinity.”

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Request

- The Board of Supervisors should ask for an updated fire plan.
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Exhibit No. B

Meeting Date: 7/17/24 Agenda No. 11

Presented by: Public

NCER PROJECT - INVENTORY CONTROL

- **PDS will limit processing of material to 20 tons/day and outgoing product to 2 - 4 truckloads per day.**
- **PDS says county does not limit number of incoming truckloads.**
- **Number of incoming trucks will most likely exceed outgoing trucks and result in massive accumulation of inert and flammable debris.**
- **California Code of Regulations:**
 - **Limits inventories of unprocessed and processed materials**
 - **Inventories held beyond a certain period are considered to be improper disposal, requiring enforcement action.**
- **BOS needs to set limits on incoming material and inventory**

SITE PREPARATION ISSUES

- **Site was a quarry/borrow pit – rock and gravel removed. Soil with poor load bearing capability left.**
- **Site preparation plan by applicant involves blasting and crushing of more than 240,000 tons of rock to provide fill for processing area and expand road.**
- **Compare crushing rates:**
 - **Normal operation – 20 tons/day inside building**
 - **Site prep – More than 8000 tons/day for 30 days in the open**
 - **Applicant's consultant report – particulate emissions/day will be much less for site preparation than normal operation. ????**
- **10 micron (PM10) particles can travel 35 miles from point of release.**
- **California Air Resources Board – Even short term exposure to PM 10 particulate matter has very bad health impacts on older people and young children.**
- GPU EIR does not address any issue relating to this type of site preparation.
- BOS needs to deny such large scale crushing on site.
- **Applicant could send rock to existing permitted facilities for crushing or import fill instead of blasting.**

NCER PROJECT - LACKS ECONOMIC VIABILITY

- **GPU emphasizes economic vitality**
- **Revenue from processing and selling permitted amount of 4000 tons/year will be about \$ 200,000/year.**
- **Revenue will not even be enough to cover employee expenses, utility costs, and maintenance expenses. Negative return on investment.**
- **BOS could deny project approval based on lack of economic viability.**
- **If applicant seeks to get approval with low scope and capacity to minimize environmental impacts and subsequently intends to expand rapidly after initial authorization, there is sufficient legal precedent to deny the approval for this scheme.**
- **Local community should not be subject to repeated interaction relating to expansion of this industrial site.**
- **Approve project only if capacity is restrained for 10 years after start of operations.**