

ATTACHMENT

For Item

11

WEDNESDAY

July 17, 2024

PUBLIC COMMUNICATION RECEIVED BY THE
CLERK OF THE BOARD

Distributed 7/12/2024.

From: Kasturi Rangan <rirangan@yahoo.com>
Sent: Friday, July 12, 2024 11:58 AM
To: BOS, District1Community; Anderson, Joel; Lawson-Remer, Terra;
monica.montgomery.steppe@sdcounty.ca.gov; Desmond, Jim; FGG, Public Comment
Cc: Gretler, Darren M; McDonald, Hunter; Slovick, Mark; Smith, Ashley J; Truong, Angelica;
Danner, Tina; Vicente; Byron Marler; Tim Kennedy; Todd Frank; Lisa Roner; Jack Dubord;
Sandra Farrell; James Chagala; Timarie Seneca-Bixler; Laura Bowersox; lpdm4@cox.net;
Tony Eason
Subject: [External] NCER Project: Hilltop Group; PDS 2008 3500 08 015

Follow Up Flag: Follow up
Flag Status: Flagged

Honorable Supervisors of the Board of San Diego County:

Further to my email of July 1, 2024, I am writing to you along with my neighbors, Vince Gill and Byron Marler, to request that you add some specific conditions to your approval of the subject project on July 17. I elaborate below:

During the General Plan Update, many years ago, the BOS obviously made an exception by rezoning the applicant's project site as High Impact Industrial even though its proximity to residential communities does not qualify it for such zoning. However this was in the past and we need to move on. What we are asking for from the BOS now is to make some more exceptions - this time in favor of the residential communities to better protect them from the impacts of the proposed industrial operation.

1. Require the project applicant to install and use electronic monitoring devices with recording capability, at various points on the periphery of the site, to monitor for dust and noise and ensure that there is conformance to established standards. Such technology is readily available and used in other parts of the USA.

PDS has informed us that "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". 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. Use of monitoring and recording technology will make it easier for the County authorities to establish if there has been non-compliance in cases where the visual sighting of dust or excessive noise abates by the time County authorities respond to a report of violation. This requirement will better protect the community from these impacts and relieve them of some of the burden of being the monitors of such issues.

2. Impose a limit on the number of incoming truckloads or tons of material. PDS informs us that there will be no limit. Since a limit is being imposed on the amount of processing that can be done per day and the amount of outgoing truckloads per day or year, not having a limit on incoming trucks will turn the site into a hideous repository for incoming debris.

3. Because this site was a quarry or borrow pit many years ago and had rock and gravel extracted from it, the ground has very low load bearing capacity. The Applicant defines a plan for extensive site preparation with blasting and crushing of mountain side rock to provide load-bearing fill and extend roadways. This is a clear indication that this site is not ideally suited for the intended operation, contrary to the argument made by the owner and his supporters in favor of the zoning change many years ago.

The guidelines state that the blasting operation will use sensors at the nearest residence to ensure minimal impact. This seems appropriate. However the crushing of the rock on site in the open to produce fill aggregate is unacceptable. If the permit for normal operation of the site is to crush no more than 20 tons/day indoors, it would be totally inappropriate to allow crushing of 8300 tons/ day for 30 days in the open just to prepare the site. The guideline for dust monitoring is that there will be a visual inspection (Ringelman chart) by a trained person once in these 30 days. Such crushing and inadequate monitoring would be totally unacceptable to the community and is in stark contrast in terms of impact, with proposed commercial operation. Please deny the crushing of blasted rock on site. The owner should send the blasted rock to other established and permitted crushing facilities to produce the fill aggregate that they need. Or else, the owner should rely entirely on imported fill without doing any blasting.

This whole blasting and crushing operation is not accounted for in the GPU EIR and does not qualify for approval.

4. The GPU emphasizes economic vitality. A simple evaluation of the economics of the proposed project, as described and conditioned, shows that it would be a total financial loss. The facility will be permitted to process 4000 tons of product per year. Assuming that this product is the more expensive concrete aggregate (about \$35/ton) and a fee of about \$15/ton for receipt of debris, the total would be an income of \$50/ton. Assuming that the entire production of 4000 tons gets shipped every year, annual income would be \$ 200,000. This would not even be enough to cover employee salaries and operating costs. How would this justify investment of millions of dollars in this project unless there are plans for expansion or diversification that are being held back at this time. How many times in the immediate future do the residents of the community need to face the issue of renewed and larger impacts from this industrial operation? The Board of Supervisors could deny approval of this project on the basis of lack of economic viability.

There is legal precedent for requiring that projects be explicit about scope and capacity as these are key determinants of impacts on the surroundings. Understating scope and capacity to get approval and then pursuing expansion or diversification is not an acceptable practice. The Board of Supervisors should ask the applicant to explain this abnormality and ensure that the project is economically and environmentally sustainable before approving it.

4. The fire plan submitted by the applicant is a short-form format. It is designed, according to County guidelines, 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. Such a shortcut plan should not be accepted by the county, without more specific requirements for "red flag" days , temperature monitoring of combustible piles of inventory, and proper definition of a water system for hydrants. The Board of Supervisors should ask for an updated fire plan.

Thanks for your consideration. We look forward to hearing your discussions on July 17.

Kasturi Rangan.