



March 23, 2010

San Diego Board of Supervisors
1600 Pacific Highway
San Diego, California 92101

Re: Merriam Mountains Proposed Development

Dear Members of the Board,

We would like to congratulate the Board in its decision to reject the Merriam Mountains Master Planned Community when the issue was first considered on December 9, 2009 (including the rejection of the General Plan Amendment, the Specific Plan, Zone Reclassification and other requests associated with the proposed development).

Based on our research, we concur with the original decision to reject the development and support the affirmation of this decision by the Board when it rehears the matter on March 24, 2010. This development represents unsound and destructive land use policy for the following reasons:

1. It fails to consider future population trends and needs. Two critically important demographic trends need to be considered by the county in evaluating future development projects:

A. It is estimated that 88% of the population growth by 2020 among adults over 25 years old will be in the 65 and older age category. In addition, the largest population growth segment in 2020 will be 75-84 year olds. The question county planners should be considering is **where will these older citizens be moving and who will be buying their homes?** The continued focus on building traditional, suburban homes separate from essential social and medical services is based on outdated development models that fail to address future trends (Myers and Ryu 2008). As the cited statistics above demonstrate, there will be an increasingly urgent need to create housing for older citizens who will be moving out of their traditional suburban homes in order to lower their housing costs, to be closer to vital services, and to find a community more conducive to their needs. Isolated, suburban homes of the type that will be built in the proposed Merriam Mountain development fail to serve these growing demands. What the county should be doing is

developing strategies (not suburban sprawl) to accommodate the changing needs of those who will be abandoning the suburbs due to economic and social pressures. One idea might be to re-examine how suburban communities can be reconfigured to allow for the location of on-site services, multiple occupancy of larger homes, and greater networking opportunities.

B. In 2020 and beyond, 90% of the growth in homeownership in California will be by the foreign-born (Myers 2008), namely recent immigrants. Will they be able to afford the type of homes being abandoned in the baby-boomer sell off as described above? Unless the county embarks on a plan to help integrate the current immigrant population into the mainstream, both economically and socially, the recent housing slump will likely be a minor blip when compared to what may happen when the elders of the baby boom generation try to sell their homes to an increasingly smaller group of qualified buyers.

2. Violates the General Plan and General Plan Update. One of the key principles in creating a safe, viable community is through the creation of a General Plan that has involved all stakeholders and focuses on the long-term impact of development. Hundreds of community members throughout San Diego County have spent countless hours providing input into the current General Plan and General Plan Update. The Merriam Mountains Project violates not only the intent of the General Plan (to maintain the rural nature of the area through zoning), but its very spirit - to allow citizens the opportunity to participate in planning the future of their own communities. If you approve this Project, you will be violating the trust of the citizens you represent, citizens who believed in the process and expected their government to adhere to the planning agreements codified in the planning process. **Why have a General Plan if you intend to disregard it when it is convenient for a particular special interest?**

3. Threatens the Integrity of the North County MSCP. The North County Multiple Species Conservation Plan has not been completed. The 2,327 acres scheduled to be impacted by the proposed project provide critical habitat and connectivity to adjoining habitats for the region's wildlife. Despite the development's set aside of 1,192 acres as a "biological preserve," the fact remains that the total project area represents one of the last remaining, undisturbed chaparral plant communities along the Interstate 15 corridor in the region. We have lost so much native open space in San Diego County already. It is vital that the remaining large parcels of wildland be preserved, especially in light of the fact that the County has not decided how this area will fit into the final MSCP. In addition, **the County has failed to adequately consider the cumulative impact this project may have on the total ecological health of the region.** Creating disconnected fragments of habitat surrounded by development will ultimately eliminate the native life forms the MSCP is supposed to protect. Please see attached paper, *Land Use Planning and Wildlife Maintenance - Guideline for Conserving Wildlife in an Urban Landscape* (Soule 1991).

4. Unacceptable Density. Allowing the construction of 2,700 homes in an area currently zoned for 64 homes in the General Plan Update will dramatically alter the environment in which the area's current residents purchased their property to enjoy. The increased

population density, noise, traffic, and lighting will create unmitigatable negative impacts on the quality of life of the area's current residents and the famous Golden Door Spa, a internationally known resort specializing in providing a peaceful location for guests from around the world.

5. Failure to Consider the Entire Fire Risk Equation. Although the developer states that the proposed development is "designed as one of the most fire-safe communities in San Diego County," they fail to comprehend the true nature of the entire fire risk equation. While the community may meet fire-safe standards today, it will become increasingly less fire-safe as time goes on; residents begin accumulating yard debris, build unapproved exterior structures, defer vegetation maintenance, etc. Such temporal changes are not necessarily a significant problem in low fire hazard severity zones. However, the proposed project is being built in a probable fire corridor and is designated as a high fire hazard severity zone by the state of California. As experience has demonstrated, the best way to reduce the loss of life and property due to wildfires is to not place developments in high fire hazard severity zones in the first place. It is foolhardy to believe we can engineer our way out fire danger in such locations.

Given these facts, we find it unbelievable that the County may waive the requirements for a fire protection plan and a community fire station for the proposed project.

On Page 310 under "Specific Planning Conditions" the County states:

b. " Prior to the approval of the ...Final Map, the applicant shall provide the Department of Planning and Land Use with a copy of a signed agreement between the developer and the Deer Springs Fire Protection District for the construction of a new fire station... The timing of the fire station is to be constructed at either 1) prior to the first occupancy of any unit or 2) at an earlier stage than [sic] Neighborhood 5. **The Director of Planning and Land Use will waive this requirement if the Director finds that the applicant has consulted in good faith with the Deer Springs Fire Protection District and made concerted efforts to reach a mutually acceptable solution, including reasonable offers relating to property, construction and other funding, but the Deer Springs Fire Protection District has refused to enter into such an agreement.**"

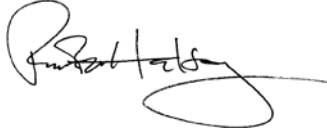
and

c. "Prior to approval of the...Final Map, a community protection / evacuation plan shall be completed to the satisfaction of the Director of Planning and Land Use, for the Merriam Mountains community. This plan shall be prepared with assistance from the Deer Springs Fire Protection District, Office of Emergency Services, and any other interested public agency(ies). **The Director of Planning and Land Use will waive this requirement if the Director finds that the applicant has consulted in good faith with the Deer Springs Fire Protection District and made concerted efforts to prepare an acceptable community protection / acceptable evacuation plan, but the Deer Springs Fire Protection District will not accept the content of the plan.**"

The notion that the County may go over the heads of the local fire district and ignore the desires of the surrounding community in order to approve a development is contrary to what good government represents.

We have found the proposed Merriam Mountain Project inconsistent with sound, logical land planning standards. It ignores the rights of local residents, the community-based land planning process, the need to preserve high quality native habitat, and the quality of life of future residents.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard W. Halsey". The signature is fluid and cursive, with a large loop at the end.

Richard W. Halsey
Director
California Chaparral Institute
www.californiachaparral.org

Attached References:

[Myers, D. \(2008\). Immigrants' contributions in an aging America. Communities and Banking, Federal Reserve Bank of Boston 19: 3-5.](#)

[Myers, D. and S. Ryu. \(2008\). Aging Baby Boomers and the Generational Housing Bubble: Foresight and Mitigation of an Epic Transition, Journal of the American Planning Association 74: 17-33](#)

[Soule, M.E. \(1991\). Land Use Planning and Wildlife Maintenance - Guideline for Conserving Wildlife in an Urban Landscape. Journal of the American Planning Association 57: 313-323.](#)