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[Department of Planning and](#)
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[County of San Diego](#)

RE: Scoping Response/Request for
Proposed Newland Sierra
General Plan Amendment
PDS2015-GPA-15-001
PDS2015-SP-15-001
PDS2015-REZ-15-001
PDS2015TM5597

Gentlemen:

Second time's not the charm.

A few less houses than 2010. No fewer overwhelming hazards.

Again, we see a continued attempt to usurp and overthrow the superb land-use planning that produced the County General Plan, passed on August 3, 2011.

Why were the taxpayers burdened by the 13-year, \$18,600,000 General Plan Update if it can be overthrown by the greed of developers who demand "entitlements" of over this 1,000% increase in dwelling units on their land? They refuse to heed Supervisor Dianne Jacob's wise warning, referencing the land use density maps: "What you see is what you get."

1. This project ignores the dangerous microscopic shards of silica that will burst forth from "The Bombing of Merriam Mountain" – year in and year out. The rocks are 70% silica. It's not "dust." You can't wipe this away with a Pledge-saturated dusting cloth. To level the mountaintop and build their roads they will have to blast & pulverize rock equivalent to the length and breadth 60 professional football fields – as a cube,

every one of them 100 ft. high. The resulting “silica plumes,” with shards so fine and sharp (because they were blasted by explosives, not eroded away by wind and water); they waft perpetually, over decades, kicked up with every gust of wind – until they settle in the lungs of man and beast. These minute, knife-sharp silica shards pierce the alveoli (the sacs of the lung tissue), and being so microscopic, can’t be coughed out. Slowly the lung tissue heals over – in scar tissue, the human body’s toughest tissue. But lungs need tissue that’s flexible and elastic, not tough, stiff and solid. The lung is a bellows, and if it can’t flex to draw air in and force it out again, you now have the irreversible condition known as silicosis. It is slow-moving, unnoticed at first, eventually fatal. Within 10-20 years, if your heart hasn’t given out in the Herculean effort to draw air in, and then expel it, you will die horribly and desperately, “like drowning in air.” Air is all around you, you need it, but you can’t draw it in. These silica plumes can travel 40 miles over the years. In the Deer Springs Valley, in Hidden Meadows, in Valley Center and Bonsall, in Escondido and in Rancho Bernardo to the south, even in Pauma Valley, 20 miles to the east we can anticipate silica shards entering our lungs 10 – 20 years after the first blast at Merriam starts, as the developer blows the mountaintop to smithereens. It is the way the air blows, with onshore breezes from the ocean, 90% of the year. The County needs to interview pulmonologists to understand the depredation that silica shards do to the lungs, then the heart, which fails from over-exertion in its attempts to push air in and out of the stiffened lungs – chronic, increased disability ending in death.

2. Please heed the wisdom of Supervisor Ron Roberts, who was the deciding vote when the earlier attempt was made to vastly increase density on Merriam Mountain (by a consortium that included the present applicant as its 50% interest):
“ ... State regulations seek specifics in addressing greenhouse gasses, but with this project we have no framework for determining how those actions will be carried out. ... Housing development will become more urban, providing the amenities the communities want and ask for, and transit connections that do more than just a token job of offering people transportation alternatives besides the automobile. ... Just as much care must go into evaluating those needs as we now put into water and sewer.” This project DOOMS any Climate Action Plan the County could develop and the lack of curbs and accountability on rampant development is the primary reason two courts rejected the County’s CAP, and the California Supreme court refused to hear the County’s appeal. Please, DPDS, “get real” about Climate Change!

3. The tonnage of greenhouse gasses that this automobile-dependent commuter community's vehicular traffic would produce clearly has the potential for causing significant effects on the environment extending beyond San Diego County and interferes with the attainment of state air quality standards. Not only will San Diego County suffer, but so will Riverside County to the north. Thus, its proposed 2,000+ dwelling units, being in excess of 500, per Section 15206 of CEQA, requires the County to submit its Draft EIR, as a "Project of Statewide, Regional or Areawide Significance" to the State Clearinghouse and SANDAG as well as Riverside County.
4. Road networks serving this proposed development would be inadequate; traffic will back up and be stalled, spewing further air pollution. The number of vehicles from this proposed development will fill one lane of the I-15 freeway at peak traffic hours. SANDAG has no plans to widen I-15, ***nor should they***. You destabilize the mountain if you try to cut away the foot to widen Deer Springs Road.
5. Emergency evacuation from Merriam Mountain will be impossible considering the number of vehicles from 2,000+ homes. Further, putting 7,000 residents cheek-to-jowl with chaparral and other high-fuel vegetation in the open-space easement increases the danger of human-wildland interface fires. Kids experimenting with matches. A resident discarding a bottle in the brush -- the sun's rays concentrate, to ignite fire in dry grass. A pyromaniac slyly setting an incendiary device off a trail, then escaping before detection. The risk of burning embers from wildfires during Santa Anas -- embers that can travel 2 miles in high winds, winds increased by firestorms generated at the source, as in the North County fires of May, 2014.
6. Even with all that risk, the developer will not build, equip and staff a fire station on Merriam Mountain -- nor can 2,000 homes support one. This is insane.
7. Land for a charter school? Proof that the developer will not risk conferring with local public school districts -- who could only offer fragments of school service, thus local children would have to be bussed excessive distances unless parents are willing to accede to the unknown "little red schoolhouse ... that couldn't." This is terrible educational planning. All applicable school districts should be solicited for reports of their ability to serve kids living on top of Merriam Mountain -- no matter how poorly, nor at what distance.

8. Has this applicant purchased the required number of EDUs (sewage-processing units @ 250 gallons per household per day) from the JPA that built the Encina plant? The local sewer district did not include Merriam Mountain in its expansion purchase (and why should they use rate-payers' funds to do so, in anticipation of land speculation by some developer in future?)
9. Use of a "package treatment plant" for 2,700 dwelling units on top of the mountain was economically infeasible in the previously-proposed project atop Merriam Mountain, thus the need to build a tandem sewage transport line from the bottom of Merriam Mountain to the Encina plant. 2,000 dwelling units will make it even more economically infeasible. Thus there will be NO recycled water available for this project's landscaping! We are in perpetual drought. This is a water-wasting project.
10. If it looks like leapfrog, leaps like a leapfrog – let it croak like a leapfrog. No parsing of zoning can make this leapfrog development look like anything but a leapfrog development. It is incompatible with its surroundings and violates the public trust that put over \$18,600,000 of taxpayer dollars into a sound, climate-alert, traffic-minimizing General Plan that values fire safety and clean air for all San Diego County.

Respectfully submitted,

Patsy Fritz