S.O.R.E.

(Save Our Rural Economy)
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January 15, 2009

Eric Gibson, Director
Devon Muto, Chief of Advanced Planning
COUNTY OF SAN DIEGO
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, California 92123

Re: Project Name: Draft General Plan; General Plan Update
Subject: Comments on Draft General Plan

Dear Mr. Gibson and Mr. Muto:

The comments set forth below concerning the Draft General Plan Document/General Plan Update (hereinafter "GPU") are being submitted by S.O.R.E. (Save Our Rural Economy).

S.O.R.E. consists of a grassroots group of residents, property owners and concerned citizens of San Diego County who have watched in amazement for the approximate past decade as the County has suffered its residents and employees through this GPU process. S.O.R.E. believes that the GPU is necessary and that it is not too late to save the plan from its fatal flaws. In fact much of the work that has been done has been valuable and is still relevant, only under the new and different assumptions of 2009. The GPU could still be an opportunity for the citizens of San Diego County to make their county a better place to live, work and play. However, the plan needs to change its primary focus from the environment back to the citizens it is intended to serve. It needs to be more responsive to the economic realities of today and tomorrow. That is not to mean that it should not be sensitive to the environment, but it must do so without harming or failing the people of San Diego, or putting our rural communities in economic peril. S.O.R.E. would like to work with DPLU to correct the indiscriminate downzoning and other flawed aspects of the GPU that we believe will destroy many of the small rural communities in eastern San Diego County.

It is well known that the rural areas of eastern San Diego County have the highest incidence of unemployment and lowest average per capita incomes in the County. The people of the back country are particularly vulnerable to turns in the economy, such as the one we are experiencing now. Economic circumstances that families in other parts of San Diego County are able to weather are much more difficult in east San Diego County rural communities like Potrero where the median income of a family is half that of the average for the County ($29,531 vs $58,960) and up to a quarter of the families live below the poverty line. Local jobs are scarce, and commutes long. Many families are unable to take care of all of their current financial

obligations, as is evident by the fact that Campo, percentage-wise, has been the most impacted area in the entire county by sub-prime mortgage foreclosures and lost homes. They are also the hardest hit when cost of fuel rises, as we know it will again.

S.O.R.E. believes that the current economic climate calls for economic incentives on the part of Government throughout America, but especially in places where people are hardest hit. We strongly feel that in the midst of this historic economic downturn, that all Government, but particularly County Government, should be doing all that they can to CREATE economic stimulus. This is especially true on behalf of the small band of hearty, but vulnerable residents (20,000) who inhabit our most rural Back Country communities of North Mountain, Central Mountain, Mountain Empire, Julian, and Desert. For any new general plan to be adopted in these times, it must be relevant to the "entire county", including these people, and must reflect today's circumstances even as it provides guidance for the future. Therefore, this is NOT the time for the County to randomly strip away property values and virtually eliminate any potential development rights from these five rural communities, who happen to lie entirely "East" of the "Imported Water Line"... when this land is the only thing of value many of these property owners have left. If there was significant growth pressure to develop the back country, there might be a reason to re-think the rural densities. There is NOT any real threat to over-develop now, nor has there been in the recent past. That's why the population remains well below the targets set by the current 1979 General Plan. To develop in rural areas takes more effort and capital than most prudent investors would willingly commit, unless there is a clearly defined need and community based support. We would encourage the County to reinstate some or all of the deleted rural density, and also create additional "special density bonus" or "stimulus incentives" to encourage private investment to provide needed infrastructure in rural areas that the county is unable to provide with public funds.

S.O.R.E. believes the County should be taking the lead in encouraging economic recovery in many of the small rural east San Diego County communities rather than pursuing a plan update aimed to place additional obstacles in the way of self-sufficient, sustainable rural communities. We strongly recommend you consider helping to lead our regional economic recovery through the GPU. The unincorporated county of San Diego historically has provided approximately 16% of all new area housing, with the remaining 84% being provided by the cities. Although the County's past role in housing has been relatively minimal, this will necessarily change over time. Many of the cities are now reaching their physical limits to accommodate additional growth. Either new cities need to emerge or the County will have to assume a greater role in the region's housing plans for the unincorporated areas. The GPU should be seriously considering how to help make this region more economically prosperous, even as it addresses our expanding (and aging) population needs that require access to more

reasonably priced affordable housing. Urban development is expensive and not always compatible with the needs of seniors or young families. The County's GPU talks about encouraging rural land to be used efficiently but then negates the concept by striping all reasonable economic value from the land, and proposing to establish minimum parcel sizes 40, 80 and even 160 acres. This is bad economics and is only going to lead to continued sporadic "rural sprawl" on large disassociated parcels, each with its individual well(s) tapping the fragile groundwater and aquifers. That kind of development is not compatible for achieving "sustainability of resources" including land, or for providing our "mobility-challenged" seniors or new families safe living accommodations. S.O.R.E. believes this must be corrected in a revised version of the GPU before it goes to final hearing.

S.O.R.E. believes that sensible plan implementation is critical to the rural areas. Walkable, sustainable communities make sense for both the urban and rural communities alike. The only difference is the scale of "main street." S.O.R.E. would also encourage the County to push forward with the "conservation subdivision" concept now, and use it in conjunction with sustainable cluster development by identifying the appropriate locations for new "incubator" villages and new places for population centers to form and grow. Rather than downzoning east San Diego County, the County's responsibility should be to set policies that encourage the creation of the next generation of rural villages, not discourage them, as the current GPU draft seems to do. Modest, appropriately sized rural villages, where businesses and residents can prosper, should be allowed to form and operate their own mutual water and wastewater systems, or to be supported by a county service district organized to provide those services. Even the smallest of rural villages must abandon the individual wells and septic systems, and be permitted the opportunity to use modern "clean water" technology, through communal applications. These investments not only would bring some jobs back to the community, but would be a huge step toward improved health, better resource conservation and true sustainability.

S.O.R.E. believes the County must rethink implementation strategies in the rural east San Diego County. With San Diego County having the "governing authority" over approximately 2.3 million acres of land, it is effectively the custodian of this land. Therefore, it is incumbent upon the County to manage this fiduciary responsibility honestly and fairly. The relatively small number of people now living in the back country need just as much a chance to enhance the quality of their lives as those living in the urban centers. This includes tribal communities on federal trust lands in the eastern areas of the County. Unfortunately, they have not been well represented, nor are they a big voting bloc, so the GPU, as it now stands, has failed miserably to consider "rural areas" for the same opportunities that are being offered to the urban and non-rural areas. The plan, as drafted, would send virtually all new compact development to communities west of the imported water line. On a smaller scale, the same new compact development is needed in rural places as well and would be desirable and appropriate.

This would be the fair thing for rural citizens; for which the plan as presently proposed does not effectively allow. S.O.R.E. requests the County conduct additional public meetings to find ways to reintroduce compact development opportunities throughout our backcountry. Its well known that properly planned, walkable communities (even in rural areas) greatly increase the health of residents, reduces the impact of cars on the environment and create an economic stimulus within their service area boundaries, making long commutes less unnecessary. Rural families shouldn't be denied this opportunity because of an oversight or design. Unfortunately, these new communities will only be built if there is enough economic value and density in the rural village plan to warrant the large private investment typically needed to make it happen. The GPU's severe density reductions are an impediment that will have to be addressed if compact development is to be economically achievable. Without specifically encouraging these next generation of hamlets and villages in the new GPU, we envision the County's likely settlement pattern for the next 30 years mirroring the last 30, a continued scattering of a few large homes on larger parcels that can secure approvals for their wells and septic systems, and possibly a few bootlegged trailers on smaller lots, in harder to reach places, where approvals are less strictly enforced.

S.O.R.E. finds many of the GPU assumptions in relation to rural east San Diego County to now be invalid and not well vetted for real economic practicality. If implemented in its current form, local jobs, community services and local businesses will continue to be lost, and the notion of local sustainability will likely be lost until a subsequent GP update. There is also no way with the new general plan densities, that these rural county planning areas can achieve their needed new housing stock to meet the projected 20+ year population estimates. The County DPLU staff has publicly stated that planned new densities have been modeled and have validated that future population growth can be affectively accommodated. S.O.R.E. disagrees. We have not studied all of the sub-regional planning areas but, in looking at the Campo/Lake Morena planning area, we have determined that there will be a need for about 840 new homes over the life of the new GP to meet the target population growth of 2,302 new residents. We have also determined that there are less than 400 existing or possible new parcels that can actually be brought to meet all county code requirements (including groundwater and public health) before the community is "built-out" under the new rural density proposal. If this same analysis holds true for the other communities in Mountain Empire and the other rural sub-regions, this shortage of housing will clearly destroy these small local economies, and put more financial burden on the County to solve this problem. S.O.R.E. requests that DPLU provide a more definitive analysis that now looks at the rural groundwater and septic constraints including minimum lot/parcel sizes as well as all other environmental, economic, and development constraints that a rural builder would need to overcome, to bring those theoretical new homes a certificate of occupancy, as part of the supporting documentation for justifying their density shift from rural to coastal property.

S.O.R.E. believes there are significant legal and financial impacts of plan as proposed. S.O.R.E. also believes that if the County does not recognize the unfair hardship they are imposing on the backcountry citizens, as they follow through with in their present plan to shift density (and economic value) from the mountains to the coast. S.O.R.E. strongly believes that this will be making a terrible and unnecessary mistake, based largely on faulty assumptions and bad science. More importantly, S.O.R.E. believes these actions could likely destabilize our entire region's economic fortunes for years to come by exposing the GPU and all involved to such massive law suits for "wrongful taking" and that any ability to process "discretionary land use application" through the County, in a timely manner, will be badly compromised. This means new employers and jobs will go elsewhere to grow their businesses. Examples of this kind of shift in communities' economic fortunes are evident throughout our country and it certainly can happen here in San Diego. On top of the legal morass is the specter of seeing most of east San Diego County property owners filing for major property tax relief, at a time when the County has no money to pay for rural fire protection, and is facing historic budget deficits--all for no apparent reason. It's not as if any of the five east County sub-regional planning areas have even come close to achieving their projected 1979-2009 housing targets from the old 1979 General Plan. They haven't. And this was with the Multiple Rural Use (18) land use category applied over most of the privately owned lands. The new plan as proposed would have the general affect of decreasing the allowable density for development, across the board, by a factor of approximately 10 times. Where the old standard of density was one home per 4/8/20 acres subject to slope and groundwater variance, the proposed GPU in those areas outside the arbitrarily assigned "village" boundaries, mandates density of one per 20, 40, 80, and 160 acres; and these numbers are just the start. All other regulatory restriction must be applied to achieve the final environmentally sensitive yield. There is no incentive to undertake a development with this kind of land use policy in effect.

Throughout this letter we have been pointing out the lack of economic credibility represented in the proposed GPU. Economic activity and growth does not occur just because a plan assigns densities or makes policy statements. There still needs to be a willing population to buy, a developer with the money to finance the entire project and associated community benefits and a financial feasibility that proves that builders can sell the homes for more than they were built for. That is the economic truth. That same logic must be applied to the GPU before it goes further in the approval process. There also needs to be better understanding about the economic factors that differentiate rural areas from the more developed areas.

Presently, the rural areas suffer from much greater incidents of stagnant economies and declining communities than their urban counterparts. In some respects it is not much different than some of our inner cities with the exception that the majority of people do not have to look at or deal with it every day. The city of San Diego had a similar problem in the east village over a decade ago. The response was to create opportunity for economic revitalization that has been nothing short of extraordinary. A similar approach needs to be taken in many of the east County communities. They are slowly dying for lack of opportunity and many of the regulations and ordinances intended to fix problems in more developed areas of the County actually work to the detriment of economic revitalization in the east County. Admittedly, there are some who find this situation to be good because it "preserves the rural areas," but these areas are inhabited by people. In some cases fourth and fifth generations of families who have the same basic needs and expectations as urban citizens. They need some modest level of economic growth or the schools, healthcare system, community services, fire protection and public safety programs will wither and die a slow death, creating more dependency on already stretched County services. These communities need to be unleashed to be at least somewhat self-sufficient and sustainable rather than restrained by a plan that condemns them to a slow death.

S.O.R.E. believes that the proposed GPU will exacerbate and already dire socio-economic situation in the eastern areas of the County that needs to be considered in the economic justice component of environmental analysis. In terms of race and ethnicity, the rural east exhibits less diversity than San Diego County generally: 78.3% of the service area population is Caucasian; 15.2% is Latino; 1.7% is American Indian; and African Americans and Asians each represent 1.5% of the area population (whereas the County's population as a whole is 55% Caucasian, 27% Latino, 9% Asian, 5% African American, and 1% American Indian). This relative lack of diversity also is reflected in the percentage of people who speak English only. In the rural east service area, 84.7% of residents speak English only, while that figure is 67% for the County as a whole.

The area's age distribution is as follows, with general San Diego County figures provided in parentheses for comparison: Ages 0-4, 5.8% (7.1%); ages 5-14, 15.8% (14.7%); ages 15-19, 7.9% (7.1%); ages 20-34, 14.3% (24.0%); ages 35-49, 26.9% (23.0%); ages 50-64, 18.7% (13.0%); and ages 65+, 10.5% (11.1%). These figures suggest no major disparities between the rural east and the county generally, though it is notable that the proportion of young adults is relatively low, and likely speaks to the relative paucity of educational and employment opportunities in the service area. The percentage of non-senior older adults (50-64) in the rural east also is significantly higher than that in the county as a whole.

Socioeconomic indicators present a mixed, and perhaps not fully dimensional, picture. The percentage of persons ages 25+ in the service area who never received a high school diploma (14.4%) is below that of the county average (17%), while the percentage of service area residents having received at least a four-year college degree (23.0%) is well below the county average of 31%. The percentage of properties in the service area with a housing value below $150,000 was 22% in 2000, substantially higher than the 18% found countywide. The percentage of households with income below $10,000 in the rural east service area (7%) mirrored the countywide figure. The percent of those in this area living in poverty (12.9%) mirrors the countywide rate, while the percentage of those below 200% of the poverty level (34.7%) is 12% above the countywide rate.

What is the nature of this area beyond facts and figures? Many residents make do with meager incomes in the context of isolated lives far removed from many basic services. Some families live miles down dirt roads, with multiple generations under a roof that has served as the family home for many, many years. Many families may own acres of land – an unimaginable luxury 50 miles to the west – but may not own a serviceable car, or may be able to afford trips in the car to a supermarket or large discount store only once a month.

Children may be 15 miles from their elementary school, and 30 miles from the high school. The nearest health care provider may be over 30 miles distant. While distinct data that address domestic violence, alcohol and other drug use, and behavioral health issues may not be readily available, the rural healthcare and community services provider attests to the reality that drug use (and production), family violence, and behavioral health problems are widespread, related both to those factors that lead people initially to isolate themselves, and perhaps ultimately to the isolation itself.

The County of San Diego defines six sub-regional areas within the county, including the East sub-regional area. In 2005, 12% of the general East sub-region population was uninsured, and 15.1% of the population living at or below 200% of the Federal Poverty. The eastern areas of San Diego County exhibit the highest number of persons surveyed experiencing likely psychological distress and the highest number of families surveyed noting a child limited by a behavioral health condition. More East county low-income respondents note having received Emergency Room (ER) care for a behavioral health issue in the past year than those in any other region, the highest quotient across the county; yet the East ranked 2nd in the number of low-income residents (24.9%) with behavioral health treatment. Nearly 21% of the teens surveyed countywide who had received BH counseling in the past year lived in the eastern areas of the County and the eastern region also ranked 2nd in the number of adults who experienced a period of one year-plus of unemployment related to physical or mental impairment. East region rates both of teen and older-adult (55+) suicide exceeded those of all other regions (Co. of SD, 2004 Core Indicators rept.).

Residents surveyed in the eastern areas of the County exhibited the highest numbers of diabetes diagnoses, and the 2nd-highest rates of heart disease, high blood pressure, cardiovascular deaths, and child asthma hospitalizations. Larger numbers of east County adults surveyed noted absolute physical non-activity than in any of the other six regions (25.8% of all adults, 32.9% for low-income adults so responding), and the 2nd-highest number of obese adults (20.7% of all low-income adults noting obesity were in East).

The eastern areas of the County is home to the greatest number of families noting a child with an ADD/ADHD diagnosis. While the interaction of alcohol and other drug use with these other factors is complex, it is significant that substance use in the East is pronounced. The East region had the largest number of teens noting alcohol use (27.5% of all teen respondents countywide; 30.7% of low-income teens), and the highest number of teens who noted having tried marijuana, cocaine, glue, or other drugs (32.8% of all teens). They also were first in the number of teens noting marijuana use in the past year combined with use in the month before the survey (35.8% of all teens responding countywide; 53.0% of all low-income teens surveyed). It may also be notable that the East sub-region ranked first in fetal mortality (5.7/1,000 live births), first in infant mortality rate (7.3 per 1,000 live births), and first in the percent of pre-term births (6.7/1,000 live births – these figs. Co. of SD 2004 rept.).

In Calendar Year 2007, the percentage of patients seen by healthcare providers in the eastern areas who were at or below 200% of federal poverty level was 94%, up each of the past three years. This measure (200% of poverty level) is the federally observed rate at which a person is considered to be "medically underserved", and includes those people often referred to as "the working poor". The percentage of the over 7,000 individuals seen who were on Medi-Cal was 36%, and the percentage of uninsured patients was 16%. The three diagnoses with the highest rates seen among the individuals served were Diabetes and related conditions, hypertension, and cardiovascular disease on the adult side, and asthma on the pediatric side, followed by an increasing rate of Diabetes among children. These statistics are only a snapshot of the socio-economic issues that plague the eastern areas of San Diego County today. S.O.R.E. believes that the General Plan Amendment will only serve to worsen these conditions by taking the economic means from these small rural communities to work toward sustainable, self-sufficiency. The economic injustice of indiscriminate downzoning of the eastern areas of the County are uncalled for, especially under the present world-wide economic conditions.

S.O.R.E. has unequivocally determined that the vast majority of voters/residents/property owners in east San Diego County rural communities are, and have been since the GPU 's introduction approximately 10 years ago, largely unaware of the GPU and its dramatic down-zoning provisions; or they otherwise have the belief that the 20, 40, 80 or 160 acre down-zoning provisions of the proposed GPU were soundly defeated in the 2004 Countywide vote on the Rural Lands Initiative. S.O.R.E. believes that absentee property owners in East San Diego County (which make up a large percentage of the number of property owners east of the County Water Authority Line and own a substantial amount of the privately owned property in those rural community areas), have no representation on their respective planning group as they are not entitled to vote for those positions. S.O.R.E. has also unequivocally determined that due largely to lack of awareness, the vast majority of voters/residents/property owners in East San Diego County rural communities are detached from their local community planning groups and are unaware of the function/purpose of the planning groups in making critical decisions, albeit in an advisory capacity to the County, concerning important and essential land use issues.

S.O.R.E.'s determinations as described above have been recently evidenced by the recent election in the Campo/Lake Morena community. The Campo/Lake Morena Planning Group (CLMPG) dramatically changed with the recent election in November 2008. Several long serving incumbents, who had consistently maintained slow/highly restricted growth positions on land use matters, were defeated because of the positions they consistently advocated on land use issues. Largely due to an approximate two year concentrated effort of a local organization in the Campo/Lake Morena community, that community has experienced a significant increase in awareness about the CLMPG, its function and its importance to the community. This increased awareness resulted in the changed makeup of the CLMPG. The newly elected CLMPG now comprises a more accurate and complete representation of the members of that community. S.O.R.E. is convinced that if the citizens of other rural communities in east San Diego County were similarly made aware of the role of the respective planning groups as the conduit to the County on land use issues, those communities would see similar changes in the makeup and growth philosophies of those planning groups.

S.O.R.E. believes that the General Plan is in need of updating and that it could actually be a vehicle that ensures adequate, affordable shelter, reasonable access to basic health and community services and the basic necessities of life like food, fuel, etc., and the essential ability to make a reasonable living for the current and future citizens of the County. These topics should be the principal focus of any plan for the future of San Diego County. S.O.R.E. simply asks that the County take a fresh approach with respect to the eastern areas of San Diego County and apply all the "smart growth" concepts in appropriate scale to the rural eastern communities. The proposed GPU already has many very good provisions for providing

walkable, sustainable, built communities. The problem is that these good intentions did not translate to the rural eastern communities. S.O.R.E. asks that the County planners sit down and redraw the maps to allow for "main streets" and realistic village boundaries in these rural communities where the people can congregate, receive services and prosper. The essence of small town America has always been and remains the concept of a compact "main street" where the fire department, sheriff, library, medical facility and commercial enterprise are located. It is place where "community" is created and this is so desperately needed in these small rural communities of east San Diego County where isolation prevails. S.O.R.E. envisions extending from these modest walkable village centers an appropriate amount of compact housing within walking distance of "main street" and expanding density designations that reflect existing development in the area, especially along the existing transportation corridors. If these concepts are right and fair for the more densely populated areas of the County, then S.O.R.E. believes they should be equally right and fair on an appropriate scale for the eastern communities. S.O.R.E. asks that the County reconsider the present approach taken in the eastern areas to strip away the future economic vitality and sustainability of these communities through the indiscriminate density downzoning provisions of the proposed GPU.

Respectfully Submitted,

RICHARD F. VOLKER, Co-Chair

LONNIE M. SOLE, Co-Chair

cc: Dianne Jacob, Supervisor
Bill Horn, Supervisor