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**From:** Cherry Diefenbach [REDACTED]  
**Sent:** Friday, October 29, 2021 11:54 AM  
**To:** COSD, Redistricting; redistricting@abasd.org; tzane@pac-consulting.com  
**Cc:** Donna Tisdale; Vern Denham; Descanso Planning Group; Billie Jo Jannen (Campo)  
**Subject:** [External] the IRC process and the draft maps dated 10/21/2021

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

To whom it may concern,

October 28, 2021

Please accept my personal comments on the IRC process and the IRC's draft maps dated 10/21/2021.

The draft regional maps developed by FLO Analytics at the request of the Independent Redistricting Commission (IRC) identify the locations of urban communities and all the Indian reservations. However, the same maps fail to show the unincorporated communities like Alpine, Borrego Springs, Ranchita, Fallbrook, Spring Valley, Lakeside, Ramona, Jamul, Campo, Descanso, Pine Valley, Boulevard, Jacumba, and others. **Through their omission, the IRC maps not only marginalize rural towns, they also visually minimize the potential impacts that redistricting will have on the autonomy and rural nature of the unincorporated communities.**

**The IRC's draft maps should include more rural highways such as Hwy 94, Hwy 79, Hwy 78, and Hwy 80.** Local communities are sited along these highways, and they are needed to provide the public, especially residents in the unincorporated areas with visual references as to how their district boundaries may be changing. I live in the small community of Pine Valley which is situated both north and south of I-8. Without a visual reference to Hwy 79 or S-2, it is very difficult to identify my community's location or that of the nearby small communities of Mt. Laguna and Guatay, which are part of the Pine Valley planning area. Draft maps of the proposed new District 1 should also include an overlay that shows the boundaries of the Mountain Empire Unified School District (MEUSD) which covers a huge geographical area. The MEUSD provides educational and transportation services for students residing in Descanso, Guatay, Pine Valley, Mt. Laguna, Potrero, Campo, Boulevard, and Jacumba, which are all communities of interest (COIs).

**If the IRC truly wanted to improve the transparency of the redistricting process, it would include a baseline map of the existing supervisory districts and provide the corresponding 2020 census data charts that accompany each of the IRC's draft maps.** In addition to the charts that describe the makeup of each existing district: total population by race/ethnicity; and VAP by race/ethnicity, the current supervisory map and all new draft IRC maps should also include a new chart that shows each district's population described as either incorporated or unincorporated area residents. Adding baseline district map and the associated population charts would provide a starting point from which the public could see why the existing district populations need to be adjusted and rebalanced.

As I have not been following the IRC process from its beginning, I am confused by the subsequent renumbering of draft maps initially identified at the 10/14/2021 meeting as Maps 1, 2, 3, and 4. Retaining the initial map numbers and using a revision date would have been far easier to understand from my perspective. Instead, I wasted a lot of time to determine that draft Map 1 evolved into draft Map 8; draft

Map 2 evolved into draft Map 6; apparently draft Map 3 evolved into draft Maps 5 and 7(?); and draft Map 4 went away. (The IRC needs to do a better job with the future development of maps so that the public can more easily follow along.)

### **Specific Comments on IRC Map 5:**

On IRC Map 5 (and the other draft maps), the composition of District 1 represents a major shift away from what is now a predominantly urban Hispanic population. Without current 2020 population figures applied to the existing districts, it is impossible to fathom why District 1 should consume much of the geographically rural area within the existing District 2. If the IRC seeks to add population to balance District 1, then shift its northwestern boundary further west of the I-5. District 1 as currently proposed on all of the draft maps, will disenfranchise the freedom-loving, rural voting population in District 2 who share common concerns like groundwater availability, wildfire dangers, and a lack of transportation options/infrastructure. Rural residents generally speaking, do not want more intrusive governmental land-use restrictions such as the vehicle miles travelled (VMT), something that will likely be supported by city residents who will suffer less impact. **Recommendation:** The IRC should not carve up the existing District 2 and instead develop an alternative map that would keep the bulk of the former District 2 area intact given that has many COI's along north and south of I-8 and Hwy 94 share resources and have many similar concerns.

On IRC Map 5, a finger of District 4 dips south of I-8 just east of the Viejas Reservation into District 1. As it does so, District 4 then isolates some closely related COIs which share the Mountain Empire sub-region's sparse educational, health, and infrastructure resources. Map 5 also appears to separate portions of Alpine into District 1 and District 4. **Recommendation:** Shift the southern boundary of District 4 north of the community of Mt. Laguna so that Descanso, Guatay, Mt. Laguna, and Pine Valley can remain in the same supervisory district with other similar rural communities in the Mountain Empire sub-region and community of Alpine is not divided. Also add additional state highways to better define that area of the district.

Map 5 appears to separate the community of Dehesa from its existing planning group and it is not clear why this is necessary. If is being done so that all five supervisory districts contain at least a "snippet" of unincorporated lands, then please reconsider the impact on that small community.

Map 5 identifies three new districts predominantly composed of large chunks of rural areas, when only two districts are required to do so by the county charter. If this will improve the allocation of resources for rural communities, then it may be worth doing. More realistically however, rural residents in the new District 1 will likely find their voices diminished because their new county supervisor will likely focus more attention on the preponderance of Hispanic voters living in the larger urban centers such as National City and Chula Vista. Just to be clear, the ethnic makeup of the districts is not important. However, the inherent differences in the interests and concerns of urban versus rural residents must be considered by the IRC in the design of draft maps.

### **Specific Comments on IRC Map 6:**

IRC Map 6 extends the new coastal District 2 well east of the I-15 for some unknown reason. Why does District 3 have a finger that extends east of El Cajon? (If both are being done so that all five districts contain at least a small portion of unincorporated lands, then it foolish. By charter, the IRC is supposed to straighten the districts' boundary lines.)

Map 6 also appears to separate Mt. Laguna and Guatay from the Pine Valley planning area and splits up the community of Descanso. **Recommendation:** Shift the southern boundary of District 4 to the

north and west so that the tiny communities of Mt. Laguna and Guatay remain within the PV planning area and Descanso is also kept intact.

Some of Map 6's Preservation of Geographic Integrity Criteria comments under "COIs not preserved in Minimum # of Districts" column are repetitive and confusing. These comments include: "I live in North Encanto...I live in Oak Park..." **Recommendation:** Review comments for content and correctness.

**Specific Comments on IRC Map 7:**

IRC Map 7 makes slightly more sense because it has just two districts that contain predominantly unincorporated areas. Again, the IRC could and should adjust the district boundaries of Map 7 to reflect a greater consistency for the COI's that were part the original District 2, some of which have been integrated into District 5.

Same comment regarding shifting the proposed southern boundary of District 5 north so that Descanso remains intact and Mt. Laguna and Guatay remain within the Pine Valley planning area.

**Specific Comments on IRC Map 8:**

It is not clear why IRC Map 8 removes the beach communities of Del Mar and Solana Beach from what is primarily a coastal district in favor of extending District 3 into the unincorporated portion of the County along I-8. Again, if this was done to split the majority of the unincorporated areas into three districts instead of the required two, please reconsider.

Same comments about shifting the southern boundary of District 4 north of its existing location so that the communities of Alpine and Descanso will remain intact, and Mt. Laguna and Guatay remain within the Pine Valley planning area.

After a review of the previously submitted comments on redistricting, it appears that the majority have been submitted by urban residents. I am concerned that the IRC has not conducted sufficient outreach to the unincorporated areas of the county where rural residents are facing the majority of changes. I only recently became aware of the impacts of the proposed new supervisory districts when I saw the draft maps in the Oct. 24, 2021 issue of the *San Diego Union-Tribune*. The IRC website should provide the public with a current tally of the total number of comments that have been received and it should also identify whether those comments came from residents in the unincorporated areas or urban areas. Then after analyzing comment data, the IRC may need offer some additional outreach opportunities in the rural areas.

I hope you will consider my concerns and recommendations.

Sincerely,

Cherry Diefenbach

A concerned resident of District 2

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