



FARM BUREAU SAN DIEGO COUNTY

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October 14, 2010

The Honorable Pam Slater-Price
San Diego County
Board of Supervisors
1600 Pacific Highway, Room 335
San Diego, CA 92101-2471

Dear Chairwoman Price:

On behalf of its members, the San Diego County Farm Bureau has been actively involved in the General Plan Update (GPU) process for more than a decade. In keeping with the GPU principle "*Preserve agriculture as an integral component of the region's economy, character, and open space network*" we have had the singular goal of working towards a plan that would support viable farming and agricultural operations in the County. We regret that we now see the proposed plan as falling far short of meeting the needs of the farm community.

On October 7, 2010 the San Diego County Farm Bureau Board of Directors voted unanimously to adopt the following position:

"The San Diego County Farm Bureau opposes the San Diego County General Plan Update because of the failure to provide remedies for losses of farm property value that will result from the plan's implementation."

While the rhetoric in the plan on the support of agriculture is appreciated, the reality is that farming cannot be preserved without the farmer. As now presented to you, the GPU lacks any manner of protection for farmers who suffer the loss of property values through changes in land use designations. Farm equity is a product of the value of the farmland used in the production of crops. When that property value is reduced, so is the long-term financial stability of the farm and the farmer.

If you deem it to be in the best interest of the entire county to make the proposed land use changes, then owners of farmland should not be asked to shoulder an undue share of the burden. This possible inequity has framed our long-held position that farmers who lose value in their farms due to adoption of the GPU should have their property equity protected. Anything less will result in financial damage to farmers and, frankly, is simply unfair. We acknowledge the authority of the Board of Supervisors to make such changes in the General Plan, however, that power does not make it right.

Over the years we have voiced our position on the need for equity protection for farmers. We believe these principles are integral to making an equity program successful:

- Not all properties would experience a value loss from reduced density.
- The loss of equity would be based on the bare land property value differential between the existing and post-GPU density designation, not on lost development potential.
- A system of appraisals to determine the property value differential would have to be developed.
- Upon completion of the appraisals the farm land owner would decide whether to enter the equity program.
- In exchange for equity protection the farmer would agree to place an irrevocable conservation easement on his or her property locking in the GPU density and making the property ineligible for future general plan amendments.
- Easements would have no restrictions on farming activity, including changing crops.
- Not all property owners would choose to enter the program.
- An equity program would have to include a number of funding sources and strategies.
- Creative ideas like conservation subdivisions will help mitigate funding needs.

As written, the points above would not constitute an equity program, but would mark the starting point for development of a program. Our biggest frustration comes from the fact that this course of action has not been pursued in the many years that the General Plan 2020 and the General Plan Update have been in formation. We believe that we have worked openly and cooperatively and now it appears that the protection of farmers was an empty promise.

We would like to point out that the voters of San Diego County overwhelmingly agreed that reduced densities and reduced parcel sizes were not acceptable on their own. With nearly identical votes of 60 percent against, the voters of San Diego County soundly rejected Propositions B and A in 1998 and 2004, respectively. From the farmers' perspective the GPU looks eerily similar to both Propositions B and A. The GPU calls for significant reduction in densities with a net result of large parcel sizes and reduced property values for farmers. It would be an absolute mockery if the farmers who stood front and center to defend the County against the two ballot measures were now saddled with the same net result had the measures passed.

The only remedy for failure to protect the value of farms and farmland through an equity program is to leave the existing General Plan densities undisturbed. It is our opinion that the current General Plan can be brought into compliance with state law under a much less aggressive plan for changing densities.

Sincerely,



Michael A. Mellano
President

Cc: Vice-Chairman Bill Horn
Supervisor Greg Cox
Supervisor Dianne Jacob
Supervisor Ron Roberts
Planning and Sponsor Groups